# Amendment proposals for NC DCC

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| **Article** | **Comment on the ACER draft amendments** | **Alternative legal text amendment proposal (if applicable)** |
| 3 | From our point of view, the wording needs to be improved to enhance clarity and consistency with RfG. | Art.3.1.(e) new V1G electric vehicles that do not meet the definition of electricity storage and associated V1G electric vehicle supply equipment, heat-pumps and power-to-gas demand units, with maximum consumption capacity ~~larger than 800W~~ of 0,8 kW or more at any voltage level.  Art.3.2.c) demand facilities that are part of other frequencies than 50 Hz ~~and~~ or DC systems (e. g. 16.7 Hz power supply systems) ~~that are not connected to a the synchronous area (e. g. static converter stations ;~~ |
| 4a(2) | The following criteria regarding the definition of significant modernization is ambiguous and will lead to different interpretation and therefore a lack of harmonization:  *“In the case of a distribution system (including closed distribution systems), the replacement of a percentage of the equipment comprising that distribution system.”*  From our point of view, the definition of “equipment” and a the proposal of a fixed percentage value is unclear and unpractical.  Only electrical characteristics that lead to increased capabilities should be considered and aligned between the relevant TSO and DSO. Simple replacements of equivalent components/assets should definitely be out of scope. |  |
| 19(1) c ii | 19(1) c ii From our point of view a relay tripping time of 100 ms is technically not feasible. A stable operation of UFLS relays needs at least 150 ms to avoid unintentional tripping.  With (purely) sinusoidal input signals a reliable frequency determination can be carried out in 3 to 5 periods with state-of-the-art UFLS relays. However, in the case of non-sinusoidal input quantities (e.g. as a result of switching operations or grids with high harmonic shares), tripping times > 100 ms can occur as a result of multiple measurements or measurement repetitions to avoid unintentional tripping. | (ii) relay tripping time including measurement and calculation time of the relay tripping time: no more than 150 ms ~~in the case that rate of change of frequency trigger is used. If the low frequency demand disconnection does not include any rate of change of frequency trigger function, then the relay tripping time including measurement and calculation time of the relay tripping time shall be no more than 100 ms~~; |