

# ACER draft amendments to the Network Code on Requirements for Generators

Fields marked with \* are mandatory.

## Introduction

This consultation aims to present ACER's draft amendments to the Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a **Network Code on Requirements for Grid Connection of Generators ('NC RfG')**.

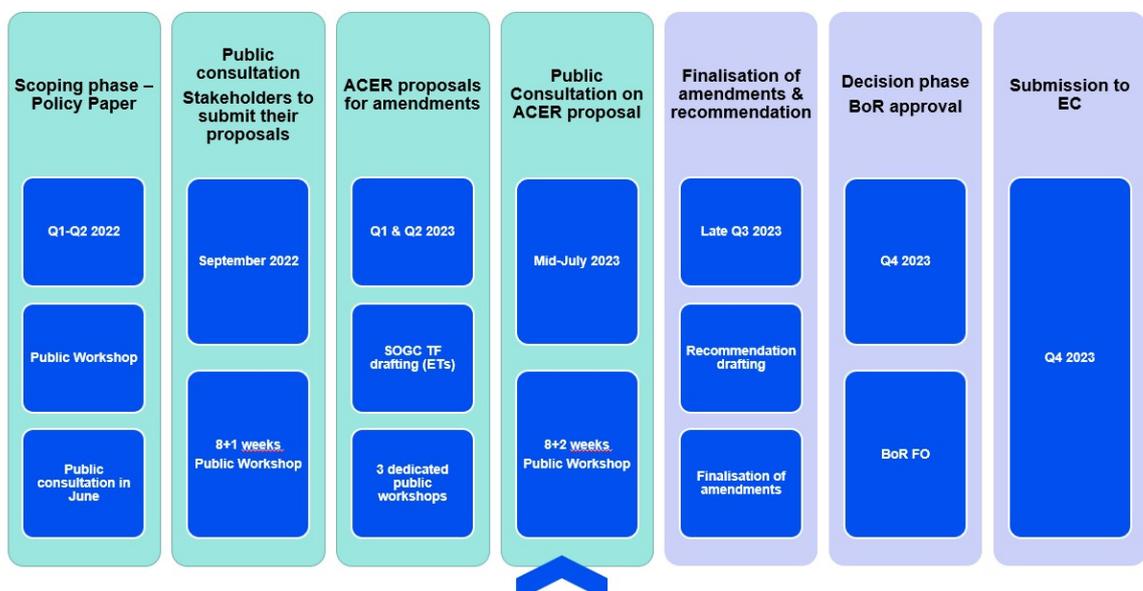
For draft amendments concerning Network Code on Demand Connection ('NC DC'), please go to the respective form: [NC DC](#).

**Responses to this consultation should be submitted by 25 September 2023.**

## Background

Important developments in the policies of decarbonisation of the European Union (EU) energy and transport sectors have taken place since the inception of the development of the first European Grid Connection Network Codes (GC NCs) in 2012.

In the framework of the Grid Connection European Stakeholder Committee (GC ESC), the European Commission proposed for ACER to initiate the process towards the amendment of the existing GC NCs in September 2022. The amendment process, as presented to the GC ESC is outlined in the Figure below:



Following the scoping phase, ACER published the Policy Paper on the revision of the network code on requirements for grid connection of generators and the network code on demand connection in September 2022. The Policy Paper aimed to transparently indicate to stakeholders the key policy areas in which amendments were to be expected.

[Access the ACER Policy Paper on the revision of the NC RfG and NC DC.](#)

As a next step, ACER launched the Public Consultation to gather stakeholders' views and concrete amendment proposals regarding the GC NCs. The stakeholders could submit their inputs by 21 November 2022.

[Access the results of the Public Consultation on the amendments to the grid connection network codes.](#)

Additionally, in the preparation of the draft amendment proposals, ACER organised three dedicated public workshops, namely:

- [electromobility, power-to-gas demand units and heat-pumps](#) (held on 17 April 2023);
- [rate of change of frequency and grid forming capabilities](#) (held on 10 May 2023); and
- [electricity storage](#) (held on 11 May 2023).

After the evaluation of stakeholders' inputs, ACER has formulated its own proposal for the amendments of the GC NCs which is subject to this public consultation.

---

## Stakeholder's details

---

ACER is highly committed in processing personal data in a lawful way.

Find out more how we process your data: <https://www.acer.europa.eu/the-agency/about-acer/data-protection>

\* Name of the stakeholder:

Oesterreichs Energie

\* Contact person:

[REDACTED]

\* Contact person's email address:

[REDACTED]

\* Country of the stakeholder's headquarters or main country of operation:

Austria

---

\* Type of the stakeholder:

- Generator (including association)
- Consumer (including association)
- Transmission system operator (including association)
- Distribution system operator (including association)
- Manufacturers (including association)
- Academia/research institution
- Regulatory authority
- Other (please, elaborate)

Please, elaborate on your answer above, if necessary:

association of electricity companies / DSOs and TSO

\* Do you consent to the publication of the stakeholder's name?

- Yes
- No

\* Do you consent to the publication of provided answers?

- Yes
- No (please, note that your answer, without your name and organization, may be shared with the EU institutions and national authorities)

---

## Instructions

---

Stakeholders are invited to submit their comments to the NC RfG articles amended by ACER in three mandatory steps:

1. by downloading the ACER draft amendments in the Word file provided below. The file can also be accessed on the right panel of the consultation form under the Background Documents;
2. by commenting on the ACER's draft amendments through this online consultation form and adding their alternative text proposals to the table, if any; and
3. by uploading the alternative amendment proposals to the **entire NC RfG** using the Track Changes mode in the ACER draft amendments file downloaded from **Step 1**.

Where the stakeholder does not have any comments regarding the amendments, the relevant cells in the consultation form can be left blank.

The mandatory steps for submitting the comments are listed below.

---

### ***Step 1***

Please see ACER's draft amendments in the Word file provided below. The file can also be accessed on the right panel of the consultation form under the Background Documents.

## [Download ACER draft amendments to the NC RfG here](#)

---

### *Step 2*

**Kindly note that this consultation form follows the structure of the NC RfG amended legal text provided by ACER in Step 1.**

The paragraph numbering in the form reflects paragraph numbers in the amended legal text. Nevertheless, stakeholders can comment on the deleted paragraphs/articles/titles, which are marked as [deleted]. New articles and titles are marked as [new].

Please use this form to comment on ACER draft amendments and/or to provide an alternative text proposal. The instructions are the following:

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below.

Includes new articles

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 1	1	2
Article 3		
Article 4		
Article 4a [new]		
Article 5		
Article 6		
Article 7		
Article 8		
Article 9		
Article 10		
Article 11		
Article 12		

Please write your amendment proposals, if any, in the table below.

	Text amendment proposal (if applicable)
New article	3

Please upload figures or tables if necessary

The maximum file size is 1 MB

Select file to upload 4

1. Leave comments on the ACER draft amendment proposals.
  2. Propose (if any) alternative wording of the relevant provision, as you provided in the Word file.
  3. Provide (if any) your proposals for adding new provisions to the relevant section of the NC RfG, as you provided in the Word file.
  4. Upload figures or tables if necessary; text inputs should be provided directly in the consultation form.
- 

### ***Step 3***

Where the stakeholder would like to propose an alternative amendment to the **entire NC RfG**, please upload the Word file (**downloaded from Step 1**) containing all your alternative amendment proposals in the Track Changes mode to the next **FILE UPLOAD** section and rename it with your stakeholder's name ("ACER\_draft\_RfG\_stakeholder\_name"). You can also upload your justification documents, where applicable.

**In case the file size exceeds the 1MB limit**, which is a consultation tool limit, kindly send the document to the functional mailbox shown on the right panel of the consultation form. Please rename the file with your stakeholder's name as indicated above and send it with the subject "ACER draft RfG legal text [stakeholder name]". Note that only submissions sent within the consultation deadline will be considered.

To facilitate the process, please, make sure that the **alternative text proposals provided in this consultation form are consistent**, to the extent possible, **with those in the Word file** you are uploading, taking into account the character limitations of each cell (max 5000 characters).

## **FILE UPLOAD**

---

Please upload your file here

The maximum file size is 1 MB

Only files of the type pdf,doc,docx,odt,txt,rtf are allowed

**e0148cb3-7fa3-4a36-9006-2e18f92cf886/20230918\_CNC\_2.**

**0\_Consultation\_Response\_Oesterreichs\_Energie\_v4\_RfG.docx**

**Kindly note that in case the file size exceeds 1MB, the file can be sent to the functional mailbox shown on the right panel of the consultation form under Contact. Please ensure that the file name and email subject are consistent with the instructions in Step 3.**

Please also upload any other document (i.e. **justifications**) below, if relevant.

Please upload your file

The maximum file size is 1 MB

Please upload your file

The maximum file size is 1 MB

Please upload your file

The maximum file size is 1 MB

---

Due to the significant length of this survey:

- you have the possibility to edit your answer after submission. When clicking on "Submit" button, you will be given a Contribution ID which you can then use to access your answers and edit them, if necessary.
- we kindly suggest that you download the entire survey as .pdf (link on the right), prepare your answers and then upload them at once in the EU Survey Tool, to avoid a session timeout on submission.

The maximum length of each cell is 5000 characters. This is the maximum technical limit set by the EUsurvey tool, which cannot be increased.

## Whereas Section

---

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Numbers in the first column correspond to the recitals of the amended version of NC RfG Whereas section, including new recitals

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
(1)		
(2)		
(3)		
(s1)		
(s2)		
(4)		
(5)		
(6)		
(7)		
(8)		

<p>(9)</p>	<p>Oesterreichs Energie thinks that the whereas (9) legal text proposal of ACER does not reflect the proposed requirements of RfG.</p> <p>An extension of the text in the preamble makes it massively more difficult to interpret the type classification of non-synchronous power generation plants and, in the worst case, could lead to a large number of sub-power plants behind a grid connection point.</p> <p>Our proposal aims to add clarity and coherency between the legal text and the whereas.</p>	<p>The significance of power-generating modules should be based on their size and their effect on the overall system. Synchronous machines should be classed on the machine size and include all the components of a generating facility that normally run indivisibly. An installation containing a set of synchronous machines that cannot be operated independently from each other, such as combined-cycle gas turbine installation, should be assessed on the whole capacity of that installation.</p> <p>Non-synchronously connected power-generating units of the same underlying technology, where they are collected together to form an economic unit and where they have a single connection point should be assessed on their aggregated capacity. Moreover, to ensure an appropriate harmonisation or rules for mass-market products, capacities of units of different classes, for instance, photovoltaic, electricity storage, combined heat and power installations, or V2G electric vehicles, should not be aggregated for the purpose of the determination of significance. Electricity storage modules integrated to a power-generating module, where the module is either non-synchronously connected to the network or connected through power electronics, used solely for the purpose of meeting the requirements of this regulation should be considered as part of such module while its capacity should not count towards the power-generating module capacity.</p>
------------	---	---

(10)		
(**)	<p>The amendment should be clarified and justified. A fully autonomous energy island isn't clearly defined in mentioned directive. Additionally, NC RfG should define technical capabilities for PGM's and shouldn't be mixed with market entities.</p> <p>From our point of view, a fully autonomous energy community shall not be allowed if it does not comply with the RfG code since it may also connect to a public grid years after the creation of this community.</p>	
(11)		
(12)		
(13)		
(14)		
(15)		
(16)		
(17)		
(x)		
(18)		
(19)		
(**)		
(20)		
(21)		
(22)		
(**)		
(23)		
(24)		

(25)		
(**)		
(26)		
(27)		
(28)		
(29)		
(30)		
(31)		
(32)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New recital	

## Definitions (Article 2)

---

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new definitions

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 2(1)		
Article 2(2)		
Article 2(3)		
Article 2(4)		
Article 2(5)		
Article 2(6)		
Article 2(7)		
Article 2(8)		
Article 2(9)		
Article 2(10)		
Article 2(10a)		
Article 2(11)		
Article 2(12)		
Article 2(13)		
Article 2(14)		

<p>Article 2(15)</p>	<p>"or determined by other appropriate means" needs to be explained and justified as it is unclear from legal prospective. At the end of the definition "by the relevant SO" should be inserted. Our proposal aims to add clarity and coherency.</p>	<p>'connection point' means the interface at which the power-generating module, demand facility, distribution system or HVDC system is connected to a transmission system, offshore network, distribution system, including closed distribution systems, or HVDC system, as identified in the connection agreement or as agreed between the relevant system operator and the demand facility owner, power-generating facility owner or HVDC system owner, or determined by other appropriate means, where an agreement is not required by the relevant SO;</p>
<p>Article 2(16)</p>	<p>"or determined by other appropriate means" needs to be explained and justified as it is unclear from legal prospective. At the end of the definition "by the relevant SO" should be inserted. Our proposal aims to add clarity and coherency.</p>	<p>'maximum capacity' or 'Pmax' means the maximum continuous active power which a power-generating module can produce, less any demand or losses associated solely with facilitating the operation of that power-generating module and not fed into the network as specified in the connection agreement or as agreed between the relevant system operator and the power-generating facility owner, or determined by other appropriate means, where an agreement is not required by the relevant SO;</p>
<p>Article 2(17)</p>		
<p>Article 2(18)</p>		
<p>Article 2(19)</p>		
<p>Article 2(20)</p>		
<p>Article 2(21)</p>		
<p>Article 2(22)</p>		
<p>Article 2(23)</p>		

Article 2(24)		
Article 2(25)		
Article 2(26)		
Article 2(27)		
Article 2(28)		
Article 2(29)		
Article 2(30)		
Article 2(31)		
Article 2(32)		
Article 2(33)		
Article 2(34)	Minor change of text is proposed.	synthetic inertia' means the facility provided by a power park module or HVDC system to emulate replace the effect of inertia of a synchronous power-generating module to a prescribed level of performance
Article 2(35)		
Article 2(36)		
Article 2(37)		
Article 2(38)		
Article 2(39)		
Article 2(40)		
Article 2(41)		
Article 2(42)		
Article 2(43)		
Article 2(44)		
Article 2(45)		
Article 2(46)		
Article 2(47)		

Article 2(48)		
Article 2(49)		
Article 2(50)		
Article 2(51)		
Article 2(52)		
Article 2(53)		
Article 2(54)		
Article 2(55)		
Article 2(56)		
Article 2(57)		
Article 2(58)		
Article 2(59)		
Article 2(60)		
Article 2(61)		
Article 2(62)		
Article 2(63)		
Article 2(64)		
Article 2(65)		
Article 2(66)		
Article 2(67)		

<p>Article 2(68)</p>	<p>"or determined by other appropriate means" needs to be explained and justified as it is unclear from legal prospective. At the end of the definition "by the relevant SO" should be inserted. Our proposal aims to add clarity and coherency.</p>	<p>maximum consumption capacity' means the maximum continuous active power which an demand unit or electricity storage module can consume, less any demand or losses associated solely with facilitating the operation of that demand unit or electricity storage module, as specified in the connection agreement or as agreed between the relevant system operator and the demand facility owner or power-generating facility owner, or determined by other appropriate means, where an agreement is not required by the relevant SO.</p>
<p>Article 2(69)</p>	<p>From our point of view it is important that V1G /V2G electrical charging parks should fulfil additional requirements (on top of V1G/V2G EVs), similar to standard Type B, C or D. Particularly, if the aggregated installed capacity is e.g. greater than the A/B threshold the V1G /V2G electrical charging park should be also treated as SGU and fulfil the relevant data-exchange requirements of SOGL.</p> <p>SOGL does not yet cover the new EV types introduced in RfG/DCC 2.0.</p> <p>Furthermore, we think that is important to further distinguish the specific requirements between AC- and DC-connected EVs. With AC charging, the regulation has to be fulfilled by the EV itself, whereas with DC charging the charging infrastructure is responsible for fulfilling the regulation.</p>	

Article 2(70)		
Article 2(71)		
Article 2(72)		
Article 2(73)		
Article 2(74)		
Article 2(75)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New definition	

Please upload figures or tables if necessary

The maximum file size is 1 MB

## TITLE I - General provisions

---

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new articles

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 1		
Article 3		
Article 4		
Article 4a [new]		
Article 5	<p>5(4) a It shall be possible to decrease the threshold to 5 MW regardless of the existing national B/C or C/D thresholds</p> <p>5(6) c We would like to raise awareness that the A/B-Threshold is harmonized to a maximum of 500 kW in the synchronous area CE (see table 1). It seems illogical that the threshold for EV3 goes up to 1 MW.</p>	
Article 6		
Article 7		
Article 8		
Article 9		
Article 10		
Article 11		
Article 12		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

Please upload figures or tables if necessary

The maximum file size is 1 MB

## TITLE II CHAPTER 1 - General Requirements

---

### General requirements for type A power-generating modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new paragraphs

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 13(1)		
Article 13(2)	We think that it is possible to fully harmonise the f-ranges in both RfG and DCC. Currently it is possible to specify different f-ranges for e.g. V1G and V2G, which may be counterproductive.	Harmonised frequency range according to table 2: 47,5 Hz-48,5 Hz for 60 min 48,5 Hz-49,0 Hz for 90 min 49,0 Hz-51,0 Hz for unlimited 51,0 Hz-51,5 Hz for 30 min
Article 13(3)		
Article 13(4)		
Article 13(5)		
Article 13(6)		
Article 13(7)		
Article 13(8)		

<p>Article 13(9)</p>	<p>13(9a) From experience with existing national regulations we know that this function is already available in the majority of infeed converters and it helps solving voltage problems in many cases.</p> <p>13(9b) From experience with existing national regulations we know that this function is already available in the majority of infeed converters and it helps solving voltage problems in many cases. On top issues with power quality (flicker) can be mitigated.</p>	<p>Type A power-generator modules shall be capable of providing reactive power with regard to <math>U/U_n</math> specified by the relevant system operator.</p> <p>see figures P(U) and Q(U)</p> <p>Type A power-generator modules shall be capable of providing active power with regard to <math>U/U_n</math> starting at 110% <math>U_n</math>.</p>
<p>Article 13(10)</p>		
<p>Article 13(11)</p>		

Article 13(12)	We ask to change the voltage threshold to 1 kV, since this is the usual threshold for LV or MV connection requirements.	With regard to voltage stability, unless otherwise provided in this Regulation, the power-generating module shall be capable of staying connected to the network and operate continuously within the range of 0,85 pu - 1,1 pu at the connection point, should that be at or below 400 V 1 kV. With regard to voltage level above 400 V 1 kV and below 110 kV the relevant system operator, in coordination with the relevant TSO, shall specify ranges of the network voltage at the connection point within which a power-generating module shall be capable of staying connected to the network and operating. The specification shall include minimum time periods during which a power-generating module must be capable of operating for voltages deviating from the reference 1 pu value at the connection point without disconnecting from the network. The voltage ranges shall cover at least the range of 0,85 pu - 1,1 pu.
Article 13(13)		
Article 13(14)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

**6ed1e082-0279-468f-a397-d55e8b2ecfee/figure\_P\_U.jpg**

Please upload figures or tables if necessary

The maximum file size is 1 MB

**7eef345d-d91e-4d7f-9f81-096a87ee83f0/figure\_Q\_U.jpg**

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

---

**[NEW] General requirements for type EV1 and EV2 V2G electric vehicles and associated V2G electric vehicle supply equipment**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 13a(1)	We think that it is possible to fully harmonise the f-ranges in both RfG and DCC. Currently it is possible to specify different f-ranges for e.g. V1G and V2G, which may be counterproductive.	See 13(2)
Article 13a(2)	Wording for "cyber-protected data exchange interface" should be aligned with other wordings used in RfG or DCC; We propose to use a more generic definition, such as "communication interface".	
Article 13a(3)		
Article 13a(4)		
Article 13a(5)	Mistake in figure (should be $s=5\%$ )	
Article 13a(6)		
Article 13a(7)		
Article 13a(8)		
Article 13a(9)		
Article 13a(10)		
Article 13a(11)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

---

**General requirements for type B power-generating modules**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 14(1)		
Article 14(2)[deleted]		
Article 14(2)		
Article 14(3)	<p>Besides new HVRT requirements, Oesterreichs Energie proposes to add in parallel further clarifications. These additional clarifications take into account, that the recommended over-voltage protection settings in national grid codes usually require the fulfilment of voltage quality criteria (EN 50160) and the risk mitigation of high voltages for customers. With typical protection relays (<math>U&gt;</math>, <math>U&gt;&gt;</math>) there could be a contradiction between the relevant system operator's protection concept and the full activation of HVRT in certain grid areas.</p> <p>Furthermore, we ask to clarify the per-unit basis for the HVRT requirements. Is it <math>U_{ref}</math> (i.e. the maximum per-unit value according to 14(2)) or <math>U_{ref} = 1</math> pu? Finally, we think that the proposed HVRT values are in contradiction with the isolation coordination, particularly if the per-unit basis for the HVRT requirements is <math>U_{ref}</math>. Therefore, we propose to define <math>U_{ref} = U_{ref} = 1</math> pu.</p>	<p>Add additional text after HVRT figure:            "The respective over-voltage protection settings must not counteract the HVRT requirement. The relevant system operator may define other over-voltage protection settings, in order to ensure voltage quality criteria or the risk of high voltages for customers."</p>
Article 14(4)		
Article 14(5)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

---

**[NEW] Requirements for type EV3 electric vehicles and associated V2G electric vehicle supply equipment and V2G electrical charging parks**

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 14a(1)		
Article 14a(2)		
Article 14a(3)	The clause "when operating above the minimum stable operating level" may complicate the interpretation. Some stakeholder may misunderstand it.	
Article 14a(4)		
Article 14a(5)		
Article 14a(6)		
Article 14a(7)		
Article 14a(8)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

---

### General requirements for type C power-generating modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 15(1)		
Article 15(2)		
Article 15(3)[deleted]		
Article 15(3)		
Article 15(4)		
Article 15(5)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

---

### General requirements for type D power-generating modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 16(1)		
Article 16(2)		
Article 16(3)	The clause "when operating above the minimum stable operating level" may complicate the interpretation. Some stakeholder may misunderstand it. Requirements regarding consecutive faults are missing. We believe that this is a cross-border issue and should be addressed in RfG.	
Article 16(4)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

## TITLE II CHAPTER 2 - Requirements for synchronous power-generating modules

---

**[NEW]** Requirements for type A synchronous power-generating modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article X		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

---

### Requirements for type B synchronous power-generating modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 17(1)		
Article 17(2)		
Article 17(3)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

---

### Requirements for type C synchronous power-generating modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 18(1)		
Article 18(2)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

---

### Requirements for type D synchronous power-generating modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new paragraphs

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 19(1)		
Article 19(2)		
Article 19(3)		
Article 19(4)	<p>A power related threshold for SPGMs does not make sense from a technical point of view. It is clear that specific SPGM technologies have issues with the current RoCoF requirements. However, there are also a other SPGM technologies that can fulfil the current RoCoF (2 Hz/s) requirements.</p>	

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

## TITLE II CHAPTER 3 - Requirements for power park modules

---

**[NEW]** Requirements for type A power park modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article Y(1)		
Article Y(2)		
Article Y(3)		
Article Y(4)		
Article Y(5)		
Article Y(6)		
Article Y(7)	<p>We do not support the part activation and deactivation.</p> <p>On/off switching of GF may also trigger a lot of operational risks. Who really knows what is activated/deactivated in lots of decentralized inverters, particularly in times of OtA-Updates that may inadvertently "overwrite" important setup parameters. Concluding, we propose to delete the "switching" of GF.</p>	
Article Y(8)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

---

### Requirements for type B power park modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new paragraphs

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 20(1)		
Article 20(2)		
Article 20(3)		
Article 20(4)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

---

### Requirements for type C power park modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new paragraphs

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 21(1)		
Article 21(2) [deleted]		
Article 21(2)		
Article 21(3)		
Article 21(4)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

---

## Requirements for type D power park modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new paragraphs

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 22(1)		
Article 22(2)		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

Please upload figures or tables if necessary

The maximum file size is 1 MB

## TITLE II CHAPTER 4 - Requirements for offshore power park modules

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 23		
Article 24		
Article 25		
Article 26		
Article 27		
Article 28		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

Please upload figures or tables if necessary

The maximum file size is 1 MB

Please upload figures or tables if necessary

The maximum file size is 1 MB

## TITLE III - Operational notification procedure for connection

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new articles

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 29		
Article 30		
Article 30a [new]		
Article 30b [new]		
Article 31		
Article 32		
Article 33		
Article 34		
Article 35		
Article 36		
Article 37		
Article 38		
Article 39		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

Please upload figures or tables if necessary

The maximum file size is 1 MB

## TITLE IV - Compliance

---

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 40		
Article 41		
Article 42		
Article 43		
Article 44		
Article 45		
Article 46		
Article 47		
Article 48		
Article 49		
Article 50		
Article 51		
Article 52		
Article 53		
Article 54		
Article 55		
Article 56		
Article 57		
Article 58		
Article 59		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

Please upload figures or tables if necessary

The maximum file size is 1 MB

## TITLE V - Derogations

---

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 60		
Article 61		
Article 62		
Article 63		
Article 64		
Article 65		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

Please upload figures or tables if necessary

The maximum file size is 1 MB

## [DELETED] TITLE VI - Transitional arrangements for emerging technologies

---

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Title VI [deleted]		



Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 70a [new]		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

Please upload figures or tables if necessary

The maximum file size is 1 MB

## TITLE VII - Final provisions

---

Please write your comments on the ACER draft amendments and your alternative text proposals, if any, in the table below

Includes new articles

	Comment on the ACER draft amendments	Alternative text amendment proposal (if applicable)
Article 71		
Article 71a [new]		
Article 72		

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New article	

Please upload figures or tables if necessary

The maximum file size is 1 MB

## Other additional provisions

---

Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
Other new provisions	

Please upload figures or tables if necessary

The maximum file size is 1 MB

## Background Documents

[NC\\_RfG\\_ACER\\_draft\\_amendments\\_for\\_PC\\_2023\\_E\\_07.docx](#)

## Contact

[acer-ele-2022-015@acer.europa.eu](mailto:acer-ele-2022-015@acer.europa.eu)