

# 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.

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## Stakeholder's details

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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:

vgbe

\* Contact person:

[REDACTED]

\* Contact person's email address:

[REDACTED]

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

Germany

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\* 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:

Comment : the WORD file will be forwarded by Eric Dekinderen due to its size

\* 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)

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## Instructions

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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.

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### *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	

Please upload figures or tables if necessary

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Select file to upload

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.
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### ***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**

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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

**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.

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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

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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)	Regarding the synchronous compensators: So it is NOT the intention of ACER to provide a harmonisation at EU level. This will make synchronous compensators more expensive. vgbe regrets this position.	
(s2)		
(4)		
(5)		
(6)		
(7)		
(8)		

(9)	<p>Where stands the provision that different classes of mass-market products should not be aggregated?</p> <p>Erase "non" in the expression "non-synchronously connected" because the non-synchronous case is covered by the wording "through power electronics"</p> <p>Where stands the provision that an electricity storage module can be considered as a part of a SPGM?</p>	
(10)		
(**)	An energy island is not defined	
(11)		
(12)		
(13)		
(14)		
(15)		
(16)		
(17)		
(x)		



(18)	The value of 250 msec as limit for FRT was defined years ago when injection of power was done by synchronous machines. Due to the European Green Deal, PPMs will replace SPGMs and the Short-Circuit Power will be lower. With a reduced general Short-Circuit Power, this value should be checked.	
(19)		
(**)		
(20)		
(21)		
(22)		
(**)	<p>vgbe is convinced that also environmental risks exist for physical components of the networks. We have seen in the past overhead lines destroyed by extreme winds or by galloping phenomena or by snow and ice. It is in our opinion the duty of each Member State or NRA to define a policy for environmental risks involving all actors, including TSOs, DSOs and generators.</p> <p>A philosophical question to ACER: Is this not THE argument to also draft a network code for TSOs/ DSOs?</p>	
(23)		
(24)		
(25)		

(**)	Wording issue: Converted => convertor	To add uppercase words : To the extent that an adequate contribution to the dynamically transforming system depends partly on advanced capabilities, power-generating modules should be able to support the system robustness by fulfilling appropriate grid-forming and rate-of-change-of-frequency withstand requirements AS SPECIFIED IN THIS REGULATION
(26)		
(27)	"to the extent possible" has to be erased. This is mandatory in order to respect a unique European playing field.	Development of non-exhaustive requirements should, ERASED WORDS, be carried involving European standardisation organisations
(28)	A derogation at EU level should be inserted for new areas without any experience such as RoCoF and grid forming convertors. This is the only possibility to correct errors in the RfG V2 proposal. This derogation should apply for all countries during the lifetime of the involved installation  IGDs are not an alternative because they are only suggestions without any legal power.	
(29)		
(30)		

(31)	<p>In Art.Y.6.b, a grace period of three years is defined for type A. Insert this period of three years also here.</p> <p>Each Member State has the right to extend this period for well defined technologies such as the nuclear technology.</p>	<p>Uppercase words are a proposed modification</p> <p>where the power-generating facility owner has concluded a final and binding contract for the purchase of the main generating plant by THREE years OR FOR A LONGER PERIOD OF TIME FOR SOME TECHNOLOGIES IF DECIDED SO BY THE NRA after the entry into force of this Regulation</p>
(32)	Recital 32 does not exist	

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

	Text amendment proposal (if applicable)
New recital	

## Definitions (Article 2)

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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)	If a definition of NRA as National Regulatory Authority would be added with the notion that "including where applicable a Member State", the readability of a lot of articles would increase	
Article 2(2)		
Article 2(3)		
Article 2(4)		
Article 2(5)		
Article 2(6)		
Article 2(7)		
Article 2(8)		
Article 2(9)	<p>The existing definition is not correct because machines is not defined and "cannot" should be "can".</p> <p>See proposal at the right.</p>	<p>synchronous power-generating module' means a set of a turbine or motor and an alternator which can be operated independently from other similar sets at the site and can generate electrical energy such that the frequency of the generated voltage, the generator speed and the frequency of network voltage are in a constant ratio and thus in synchronism.</p> <p>For the avoidance of doubt, a Doubly Fed Induction Machine is not a synchronous power-generating module;</p>
Article 2(10)		
Article 2(10a)		
Article 2(11)		

Article 2(12)		
Article 2(13)		
Article 2(14)		
Article 2(15)	<p>At the sentence ", or determined by other appropriate means, where an agreement is not required":</p> <p>Please add an explanation that V2G type EV1 stand in the scope of this alternative. Without additional information, a lot of questions will rise.</p>	
Article 2(16)	<p>vgbe does not understand why a modification of the old definition is required. All requirements of this NC are located in the connection point. Why to make a difference for Pmax??? This is not consistent e.g. with U-Q/Pmax from Article 18(2) (b): If active power losses are 50% along the cables between the facility and the net connection point, Q as demanded at the net connection point must be very large because Pmax is defined at the facility.</p>	
Article 2(17)	<p>To insert "similar" to take into account ACER's position about aggregation of PPMs. In detail ACER's position about the aggregation of Electric Vehicles, Electricity Storage Modules, wind turbines, photo-voltaic, ...:</p>	<p>Insert the word "similar" in the sentence: power park module' or 'PPM' means a unit or ensemble of SIMILAR units that can generate electricity,</p>
Article 2(18)		
Article 2(19)		
Article 2(20)		
Article 2(21)		
Article 2(22)		

Article 2(23)		
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)		
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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)		
Article 2(68)	Why is a demand unit defined in this definition???	<p>'maximum consumption capacity' means the maximum continuous active power which a demand unit or electricity storage module can consume, PLUS any demand or losses ....</p> <p>... where an agreement is not required AS SPECIFIED IN DEFINITION 15.</p>
Article 2(69)		
Article 2(70)	To move before definition 67 where the notion V2G is used	



Article 2(71)		change "conduct" into "transfer" ... means the infrastructure necessary to safely TRANSFER electrical energy ...
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

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## TITLE I - General provisions

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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	To rephrase the first sentence because an electricity storage module is not a power-generating facility according to definition 6 (... means a facility that converts primary energy into electrical energy...)	
Article 3	<p>In order to increase the readability of this code, is it possible to add at the number of each paragraph the Article number? Especially in articles with 10 or more paragraphs, this additional information is appreciated by the reader.</p> <p>The topic 2.(a) applies only for islands. So the "at 50 Hz" comment to solve the 16.7 Hz issue is inserted at a wrong place.</p> <p>Comment at 2.(d): A definition of "fully integrated network components" according Directive 2019 /944 is needed. So synchronous condensers are excluded. vgbe regrets this position because TSOs do not have any experience with large rotating machines.</p>	

Article 4		Topic 2.(b) ... purchase of the main generating plant by three YEARS OR EVEN MORE AS DECIDED AT NATIONAL LEVEL BY THE NRA FOR SPECIFIC TECHNOLOGIES after the entry into force ...
Article 4a [new]		<p>vgbe proposes a completely new article:</p> <p>1. Proposals for the definition of a significant modernisation of power-generating modules and the requirements applicable in those cases shall be subject to approval by the NRA (See also proposal for a definition of NRA).</p> <p>In developing the proposals, the TSO shall coordinate with relevant DSOs and conduct a public consultation in accordance with Article 10.</p> <p>2. The definition of significant modernisation shall respect the following criteria:</p> <p>(a) an increase above the latest contractual maximum capacity of the power-generating module, whether this increase results from one modernisation or several successive modernisations, of a minimum percentage to be defined in the range 5-30 % (within this range, different percentages may be defined for different technologies depending on their constraints); Comment: 30% in order to take into account the current regulation in France.</p> <p>(b) a deviation from the reactive power capability of the power-generating module at rated power P<sub>max</sub>, rated voltage at the connection point, whether this deviation results from one modernisation or several successive</p>

		<p>modernisations, of a minimum percentage to be defined in the range 10%- 20% ;</p> <p>(c) a change of components/assets due to maintenance or repair activities and the use of spare parts can never be classified as a significant modernisation. whether or not those parts are purchased new at the time of their incorporation in the power generating module; this shall also not include modification due to changes of primary energy (e.g. gas oil bioliquid) provided that the electrical characteristics remain the same.</p> <p>(d) The TSO or RSO cannot impose to modify the existing characteristics for system restoration as described in Art.15.4 after a significant modernisation.</p> <p>In the proposal, TSO can propose additional criteria defining a significant modernisation if the modifications have an impact on the electrical characteristics at the connection point.</p> <p>3. For each criterion listed in paragraph 2 above, the TSO's proposal shall specify the requirements of this Regulation that shall apply to the entire modernised power-generating module or only to the modernised part of the power-generating module.</p>
	<p>Comment 1:</p> <p>ACER's statement that not all PPMs but only PPMs of an identical nature have to be taken into account in the definition of the total capacity is missing. See Recital 9.</p> <p>ACER distinguished three natures : storage, EV and PV together with wind turbines. Also a</p>	

## Article 5

provision regarding a storage device to help a SPGM increasing its capabilities according to Recital 9 is missing.

### Comment 2:

vgbe is convinced that a voltage criterion of 110 kV for the classification is out of scope of this code given the recent Green Deal European Policy. It is not allowed to block CO2 reducing investments at large industrial sites because they are connected at a voltage of 110 kV or more. Technically spoken: What is the difference between a 20 MW PGM connected to a DSO transformer 110 kV/MV (=> type B) and an identical PGM connected to an identical transformer at a chemical site (=> type D)? There is no difference.

If this proposal is unacceptable for ACER, add an escape route for certain local circumstances as decided by the NRA.

### Comment 3:

If the proposal of vgbe to delete the voltage criterion would not be accepted, then the insertion of following provision is mandatory :

If a PGM will be connected to a grid with a voltage of 110 KV or more due to the fact that grids of a lower voltage are not available in the vicinity for the connection of the PGM, then the voltage criterion in this article will not apply.  
Comment: this provision was accepted by Dr. R. Pfeiffer on behalf of ENTSOE years ago.

Topic 2.c has to be erased

In table 1 the limit for continental Europe for type B should remain at 1 MW.

Topic 4 should be erased.

Topic 8 should be erased.

To add as topic 8:

A modification of a PGM can only change its category if this modification is a significant modernisation according to 4a.

Provision to add in case the voltage criterion remains :

If a PGM will be connected to a grid with a voltage of 110 KV or more due to the fact that grids of a lower voltage are not available in the vicinity for the connection of the PGM, then the voltage criterion in this article will not apply.

Comment: this provision was accepted by Dr. R. Pfeiffer on behalf of ENTSOE years ago.

	<p>Comment 4 : only a significant modernisation can change the classification of a PGM in order to respect the European Green Deal</p>	
Article 6	<p>Comment 1 : To erase "synchronous compensation". This is imposed only for pump storage, not for any other technology. This is called discrimination. See last words of (a) : "by the converters". Why not imposed also for converters in wind turbines or in PV installations?</p> <p>Comment 2 at topic 2.(c): Rocof withstand capability 4 Hz/s not possible for DFIM. For RoCoF requirements, a DFIM is considered as a synchronous machine.</p> <p>Comment 3 at topic 2.(i) The under-voltage requirement without disconnecting cannot be applied for DFIM pump storage in pumping mode</p> <p>Comment 4 at topic 4.(c) vgbe does not see any argument to exclude type D in continental Europe and allow it in the Nordic area.</p> <p>Comment at (d): As this is a legal text, here an exact reference to articles as in (f) to (k) is missing.</p>	<p>Topic 2(a) has to be erased</p> <p>To add at 2.(c) A DFIM is considered as a synchronous machine for the RoCoF requirements.</p> <p>Important note: Given the fact that the references of several exceptions will change in the final version of the code, a verification of those references in the final version is mandatory.</p> <p>Topic 2.(h) has to be erased</p> <p>topic 2.(k) has to be erased</p> <p>Topic 4.(c) has to be erased</p> <p>Topic 7 has to e erased</p>

	<p>Comment 5 at topic 7</p> <p>This is pure discrimination. Synchronous compensation is imposed at EU level for pump hydro.</p> <p>For all other technologies with an identical convertor, each Member State may consider defining the requirements.</p>	
Article 7	<p>Comment at topic 3(g):</p> <p>This point gives too much power to the TSO, and is a contradiction of the European level playing field.</p>	Topic 3.(g) has to be erased
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

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## TITLE II CHAPTER 1 - General Requirements

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**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)	<p>Comment 1: This comment is needed because for hydro installations the inertia of the fluids does not allow high values of the RoCoF:</p> <p>Comment 2: a maximum over-frequency of 52.5 Hz is forbidden. EN standards allow over-frequencies only to a value of 51.5 Hz. The SOGL code imposes to respect the frequency ranges of existing PGMs. So a frequency above 51.5 Hz will never be allowed.</p> <p>The values in table 2 impose an unlimited operation in the range 49.0 Hz - 51.0 Hz. Meaning that new plants have to be designed for both extreme frequencies in this range. But in reality the frequency is for 99.999% of the time near 50 Hz. So please add a reference to the SOGL code.</p> <p>Topic (d) has to be erased because: Not possible for SPGMs given the fact that EN standards impose 51.5 Hz as maximum. Propose to limit this to PPMs. This should not apply for PPMs in pumping mode. The SOGL code imposes to respect the frequency ranges of existing PGMs. So a frequency above 51.5 Hz will never be allowed.</p>	<p>To add at 2.(b) With regard to the rate-of-change-of-frequency withstand capability RESPECTING THE SAFETY ASPECTS IMPOSED BY THE TECHNOLOGY OF THE PGM AS AGREED BETWEEN THE TSO AND THE OPERATOR OF THE PGM</p> <p>To add at 2.(b)(ii) For the avoidance of doubt, a DFIM is considered as a synchronous generating module for this rate-of-change-of-frequency withstand capability.</p> <p>Figure XX.a has to be replaced by another one with 51.5 Hz as upper frequency.</p> <p>To add in table 2: unlimited WITH RESPECT FOR THE PROVISIONS OF SOGL CODE</p> <p>Topic (d) has to be erased</p>
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Article 13(3)	<p>Comment: This external signal was asked by DSOs and intended only for PV panels. It is not allowed to impose a similar requirement for type C&amp; D units due to cyber security reasons.</p> <p>Comment: Restriction added due to other regulations (such as environmental requirements for run of the river PGMs).</p> <p>In the sentence "In the case of electricity storage modules, Pref could be the actual active power at the moment the LFSM-O threshold is reached or the maximum capacity or maximum consumption capacity, as specified by the relevant system operator."</p> <p>Comment: Why is this Pref not defined in this Regulation? Harmonisation at EU level will be lost.</p>	<p>To add in topic (g): ... would result in an increase of power above the LFSM-O setpoint BUT WITH RESPECT OF OTHER REGULATIONS SUCH AS ENVIRONMENTAL REQUIREMENTS. ACCORDING TO AN AGREEMENT WITH THE PGM OPERATOR, THE POWER GENERATING MODULE POWER PARK MODULES TYPE A &amp; B CONNECTED AT LV OR MV shall be able to receive ...</p> <p>The response time, <math>T_{resp}</math> in Figure XX, for active power decrease in case of increasing frequency, shall be as fast as technically feasible AND AS ALLOWED BY OTHER REGULATIONS and as described below:</p>
Article 13(4)		
Article 13(5)		
Article 13(6)		
Article 13(7)	<p>Comment: the TSO or the DSO cannot impose this against the will of the operator of the PGM.</p>	<p>The relevant system operator shall have the right to specify requirements for equipment to make power-generating module operable remotely IF REQUESTED BY THE OPERATOR OF THE PGM.</p>

Article 13(8)		<p>In topic d : replace "Pmax/min" by Pmax per minute"</p> <p>Comment "min" in the expression can be interpreted as "minimum"</p>
Article 13(9)	<p>Comment at (b):</p> <p>Given the definition of "autonomous connection", no one will do this at a frequency below 49.8 Hz. So change this value.</p> <p>Compare those values with the ones imposed for storage in Art.13a. Strange.</p> <p>Comment at (c):</p> <p>The value of 60 seconds is exaggerated for a synchro-coupler used for SPMs.</p> <p>Comment at (f):</p> <p>Comment: A circuit breaker is not defined in this Regulation. A circuit breaker is not used to connect small PPMs such as PV. I propose to erase "measured at ..." completely.</p> <p>Do all conditions apply also for PPMs without GFM capabilities?</p>	<p>Insert uppercase words at (g):</p> <p>Autonomous connection IN THE MEANING OF "WITHOUT CONSENT OF THE RSO" is allowed unless ;;;;</p>
Article 13(10)		

Article 13(11)	<p>Comments at (a)(i):</p> <p>Comment 1: a droop of 1% is not realistic. See justification formulated by Gunnar Kaestle.</p> <p>Comment 2: What does the word “adjustable” mean? Continuously during operation or at the purchase according to the connection agreement?</p> <p>Comment at (e):</p> <p>the value of 1 pu of Pmax is not possible for all storage installations. This value is only possible for batteries, not for other systems such as compressed air.</p>	
Article 13(12)		
Article 13(13)	<p>Comment: The original text allows that each DSO would impose its own rules. This has to be done at MS level and approved by the NRA.</p>	
Article 13(14)	<p>Comment at (a)(i):</p> <p>Comment: Type A PGMs are mass-market products. For EV, a uniform requirement is imposed in all EU countries. Why not a similar policy for ALL type A PGMs? Article X allows that all TSOs impose own requirements.</p> <p>Comment at (b):</p> <p>Is the notion "grid forming capability" defined?</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

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**[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)	<p>The values in (b) are identical to the ones in Art. 13.2.b. I prefer a reference to this article instead of a repetition of the values.</p> <p>Comment at (b)(iii): This is a contradiction with the provision above: defined by DSO and TSO. See statement below figure XX.b in Art.13.</p> <p>Comment at figure XX.a and XX.b: Those graphs are already imposed above. Why to repeat this?</p>	<p>(iii) If the rate-of-change-of-frequency is used for loss of mains protection, the rate-of-change-of-frequency threshold shall be set at higher values than the ones defined in point TO ADD A REFERENCE</p>
Article 13a(2)	Does this topic exist??	
Article 13a(3)	<p>In (a): Why a different frequency range as in Art.13??</p>	
Article 13a(4)		
Article 13a(5)	<p>Comment : Propose to make a general reference to Art.13 and indicate only the exceptions here.</p> <p>Comment at (c): So an V2G EV of continental Europe is not coherent with the RfG requirements in Ireland and may not inject energy into the grid in Ireland. Is this the intention?</p>	



Article 13a(6)	At (b): So an V2G EV of continental Europe is not coherent with the RfG requirements in Ireland and may not inject energy into the grid in Ireland. Is this the intention ?	
Article 13a(7)		
Article 13a(8)		
Article 13a(9)	Comment: I suppose that those values are specified here to impose a harmonisation at EU level without any national particularities. Such harmonisation is required. But why is a type EV3 excluded? Are you sure that a 45 kW charging device will never be installed in a car?	
Article 13a(10)		
Article 13a(11)		

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

	Text amendment proposal (if applicable)
New provision	

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**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)	<p>Comment: what about voltage below 110 kV? Nothing defined in this text.</p> <p>Comment: based on Recital 16, it sounds logical to impose identical requirements to continental Europe and to the Baltic area. So make ONE table for Continental Europe and Baltic.</p> <p>Comment at 1.1 pu for 400 kV: The value 1.10 pu exceeds EN standards. So equipment of Siemens or ABB is not coherent with this value. Proposal to add a sentence that identical material as used by the TSO is supposed to be coherent as long as IEC / EN standards are not updated. Dr. Ralph Pfeiffer indicated at an ESC GC meeting that it is not the intention of ENTSOE to impose 550 kV equipment for a 400 kV connection. A legal basis to allow equipment according to EN for 400 kV is mandatory.</p> <p>Comment : given the fact that voltages are specified in the tables, both tables can be merged to a single table.</p>	<p>In table XX.1 : add "and Baltic area" after "Continental Europe" Erase dedicated values for Baltic.</p> <p>Add a note under the table: Regarding the requirements for equipment 400 kV, identical equipment as used by the TSO is supposed to be coherent as long as IEC / EN standards are not updated.</p>

Article 14(3)	<p>Why two tables for the FRT?  This makes it more difficult to read. Make one table of this as in the past but with references to points A, B,C,D,E and F in the figure 3.  See uploaded figure 3</p> <p>Comments at figure X:  Comment 1 : The voltage level of 1.3 pu is not imposed in the DCC code. Why is it imposed in the RfG NC?</p> <p>Comment 2: Given the delay of the functioning of an OLTC, an over-voltage shorter than 5 sec, will always arrive at the terminals of the alternator. So EN 60034-1 applies, limiting the over-voltages at an alternator at 1.3 pu during 0.1 sec and 1.2 pu during 3 sec. No manufacturer of alternators will accept the requirements of the original figure X. vbge proposes to insert the new figure and definition of Urecf = 1 pu in the paper.</p>	<p>Insert a new figure X as uploaded below</p> <p>Modify the sentence "Urecf is the maximum voltage specified in paragraph 2" in "Urecf is 1 pu as specified in paragraph 2".</p>
Article 14(4)	<p>Comment: those requirements are already specified in Art.13. Why to repeat this?</p> <p>At (a):  Will this be defined before commissioning or during the operational life of a PGM after each incident?</p>	<p>In (a):  ...to the reconnection conditions specified by the relevant SYSTEM OPERATOR</p>

Article 14(5)	<p>Comment at (d)(i):</p> <p>Comment 1: What about PV panels type B connected at DSO level without real time information and only a smart meter with time stamping????</p> <p>I prefer to the original text. This comment applies also on the following paragraphs</p> <p>Comment 2: Which article in (EU) 2017/1485. I did not find it.</p>	<p>The old text of (d)(i) has to be restored.</p> <p>Paragraph (d)(v) has to be erased.</p> <p>This is exaggerated for a type B unit.</p>
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Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**[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 was not analysed in detail. Several provisions seem identical to previous requirements	
Article 14a(2)		
Article 14a(3)		
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	

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**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)	References of the exceptions should be checked in the final version of the code.	
	<p>Comment at (b): Is this possible for frequency stability? It will come always too late?</p> <p>Comment at a unique threshold: Comment: this imposes a unique value for all new PGM in a synchronous area. Is that the intention? This was completely different in the past.</p> <p>Comment at the droop: Art.13.11 specifies for a battery a droop between 0.2% and 5%. What provision prevails for a battery of type C? This article or article 13?? Idem for the threshold. If this article does not apply for ESM, this should be specified.</p> <p>Comment at the external signal in (c)(ii): Not allowed for cyber security reasons. Why is this proposed? Is this a mirror proposal as the LFSM-O proposal from the DSOs? If yes, add the conditions only for type A &amp; B PPMs connected at LV or MV. But explain the reasons to impose this for under-frequencies.</p> <p>Comment at the response time for PPMs in (c)(vi):</p>	

Article 15(2)	<p>Comment 1 : Most PPMs (PV and wind turbines) are operated at max. capacity. So this requirement is only for batteries. Correct?</p> <p>Conflict with art.13?</p> <p>Comment 2: Not possible for full converter Pump Storage Hydro. The inertia of the fluid imposes a higher response time.</p> <p>Comment at minimum regulating level in (d)(i): What is this for a battery?</p> <p>In table 4: At "1,5-100% for electricity storage module." Comment: 100% in the current mode (charging or injecting)? How to interpret if the mode has to change from charging to injecting or vice versa? At "Maximum combined effect of inherent frequency response insensitivity and possible intentional frequency response dead band..." Comment: What is this? No definition available. What is the difference with next line in the table? At "0,02-0,06 %" Why this value? Every reader can define this %.</p> <p>Comment at (f): vgbe sees a contradiction, an ESM should not disconnect but inject power according to LFSM-U-ESM.</p>	<p>In (c)(i): shall be 50Hz - (MINUS SIGN) <math>\Delta f_1</math>, where <math>\Delta f_1</math></p> <p>In (c)(vi): for LFSM-U shall be as fast as technically feasible AND AS ALLOWED BY OTHER REGULATIONS (SUCH AS ENVIRONMENTAL ONES) and as described below:</p> <p>in (d)(i) : Replace "Primary Frequency Control" by "Frequency Sensitive Mode" because Primary Frequency Control is not defined</p> <p>In (d)(iv): the initial activation of active power frequency response required shall be not be unduly delayed. To erase "as short as possible" because "possible" can be interpreted in several ways.</p> <p>In table 5 Maximum admissible choice of IMPOSED activation time <math>t_2</math>, unless longer activation times are allowed by the relevant TSO for reasons of system stability Comment: Given the paragraph under figure 6, the wording "imposed activation time <math>t_2</math>" is preferred, instead of "full activation time"</p>
Article 15(3)[deleted]		
Article 15(3)		

Article 15(4)	<p>At(iv): So nothing is specified for voltages below 110 kV. Is that the intention?</p> <p>Comment at (b)(i) the previous paragraph (3) was erased. This sentence should be modified.</p> <p>Comment at (b)(iii): I did not find the Article 21.5.d is it possible for most PPMs to change the mode during a black-out? (communication tools are missing)</p> <p>Comment at (b)(v): Comment1: Take care of the LOM (= Loss Of Mains) protection from DSOs. So robustness is in the scope of grid operators Comment 2: What is the transition from interconnected system operation to island operation. System Split??? As long as frequency and voltage are within specified ranges (47,5-51,5Hz) it's a normal operation for the PPM. The other way around from Black Start to small island operation is something completely different: low Short Circuit Capacity and low inertia with strong frequency variations.</p> <p>Comment at (c)(iii): A definition of RMS ihas to be added</p>	<p>In (iv) : To add a provision for voltages below 110 kV</p> <p>To add in (vi):be capable of regulating load connections in block load, ACCORDING TO THE AGREEMENT WITH THE TSO</p>
Article 15(5)		

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

	Text amendment proposal (if applicable)
New provision	<p>When one or more HVDC convertor stations or large PPMs are within close electrical proximity of a new to build installation submitted to this Regulation (including Art.4) or the EU Regulation 2016/1388 (including Art.4), the relevant system operator shall specify whether a study is required, and define the scope and extent of that study, to demonstrate that no adverse interaction will occur. If adverse interaction is identified, the studies shall identify possible mitigating actions to be implemented by the HVDC convertor station to ensure compliance with the requirements of the European Regulation as if it is a new convertor station. The costs of the studies and of the potential mitigating actions shall be approved by the NRA and assigned to the party identified by the NRA. The notion “close electrical proximity” in this paragraph is not limited to the relevant system operator but covers also HVDC convertor stations connected to TSOs in the neighbourhood.</p> <p>Comment: Topic inserted regarding sub-synchronous torsional interactions by an existing HVDC convertor as communicated to ACER (Uros Gabrijel) by mail on 20/2/2023 and during an online meeting on 24/2/2023. Update identification of DCC (2016/1388) needed. Identical provision to insert in DCC.</p>

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**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)	Comment: ACER added as a justification: New requirement in Article 14(5)(d)(iii) is less onerous than the one in Article 15(5)(b)(i). vgbe does not understand this because the first reference is to protection systems and the second one to fault registration.	
Article 16(2)		
Article 16(3)		
Article 16(4)		

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

	Text amendment proposal (if applicable)
New provision	

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

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**[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	<p>Topic 1(a) and 1(d) are identical. Why to repeat it?</p> <p>In 1(e): Where is point (b) of paragraph 5. I did not find it.</p>	



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

	Text amendment proposal (if applicable)
New provision	

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**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)	<p>In the sentence "Type B synchronous power-generating modules shall fulfil the requirements listed in Articles 13, except for Article 13(2)(b), Article 13(8), and Article 14."</p> <p>Ambiguous notation for "Article 14". Is it an exception or has it the same status as Art. 13?</p>	
Article 17(2)		
Article 17(3)		

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

	Text amendment proposal (if applicable)
New provision	

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**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)		<p>In the sentence</p> <p>"Type C synchronous power-generating modules shall fulfil the requirements laid down in Articles 13, 14, 15 and 17, except for Article 13 (2)(b), Article 13(6), Article 13(8) and Article 17 (2)(a)."</p> <p>Art.13.10 has to be added as exception.</p>

Article 18(2)	<p>Comment at (a): Why is this topic (a) necessary? According to (b) (iii), the reactive power provision capability requirement applies at the connection point, and thus includes losses between the PGM and the connection point. Is it necessary to specify who provides the supplementary power in the RfG?</p> <p>Comments at Figure "U-Q/Pmax-profile of a synchronous power-generating module" Comment 1: Analysis: The new lower voltage of the outer envelope (article 14(2)(a) gives 0.85, and 0.88 in Baltic for &gt; 330kV) compared to 0.875 as in RfG 1.0 means that the required current the PGM must provide at the net connection point might increase for about 2.94 %.</p> <p>Comment 2: Is the voltage range in the figure according a table in Art.13 or in Art.14?</p> <p>Comment at (c): PQ requirement should apply at the connection point (as indicated in the paragraph). So why those additional specifications?</p>	<p>In (b)(i) proposal for a new text: ... delivering the capability to supply reactive power at high voltages and absorb reactive power at low voltages</p> <p>To add in the sentence above Table 8: against the ratio of the reactive power (Q) and the maximum capacity (Pmax) WHILE RESPECTING THE EN STANDARDS SUCH AS 60034-1</p> <p>To add in (c): ... power losses of the step-up transformer and of the high-voltage line or cable between the high-voltage terminals of the step-up transformer of the synchronous power-generating module or its alternator terminals, if no step-up transformer exists, and the connection point, if applicable, into account</p>
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Please write your amendment proposals, if any, in the table below

	Text amendment proposal (if applicable)
New provision	

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**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)	Comment: a PPS is not required by current regulation in several countries.	In (a)(iii): a PSS function to attenuate power oscillations TO ADD " if the PGM size is above a value of maximum capacity as approved by the NRA".
Article 19(3)		
Article 19(4)	Comment: vgbe insists to apply this rule for all SPGMs type D. It is not allowed to block investments due to this RoCoF requirement due to two major advantages of SPGMs: (i) saving CO2 emissions in cogeneration units and (ii) increasing the robustness of the electricity system by adding "real" inertia.	Modify "With regard to frequency stability": to "With regard to RoCoF withstand capability"  Proposal for a modified provision : (a) requirement laid down in Article 13(2)(b) shall not apply to a synchronous power-generating modules type D; (b) synchronous power-generating modules type D shall be capable of staying connected to the network and operate at rate-of-change-of-frequency up to $\pm 1,0$ Hz/s over a period of 0,5 s;  Erase (c): A LOM protection is never used for type D PGMs.

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

	Text amendment proposal (if applicable)
New provision	

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

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**[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)	Comment: Where is the expression "grid forming capability" defined?	
Article Y(6)		
Article Y(7)		
Article Y(8)		

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

	Text amendment proposal (if applicable)
New provision	

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**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)	Comment: The expert group proposed also the condition “if grid forming is imposed, then (a) .... Applies”. This is expressed differently in this article.	With regard to grid forming capability, type B power park modules shall fulfil the following additional requirements if imposed by ACER (or by the NRA, but vgbe prefers a European level playing field)

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

	Text amendment proposal (if applicable)
New provision	

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**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)	<p>At (b)(iii): Comment at "certain value of Q/Pmax" : What is the goal of this requirement? More details are needed before an evaluation is possible. It is not granted that "strange" requirements for each value of Q/Pmax are realistic for realisation. Is it a linear function? Or what?</p> <p>At (d)(vi): comment: this is not the same for pumped storage as for solar for instance.;</p> <p>At (d)(viii): A change of the applied reactive power control mode operable remotely is not granted / possible if the internet is out of service after a blackout.</p>	<p>At (d)(i): .... active power-related power factor control mode AS SPECIFIED IN POINT VII below ...</p> <p>In (d)(vi): at operation close to zero active power TAKING INTO ACCOUNT THE USED TECHNOLOGY.</p>
Article 21(3)		
Article 21(4)	<p>Comment: When grid forming is imposed as proposed by the expert group. Who will impose this? ACER on behalf of EC or NRA ?</p>	<p>With regard to grid forming capability, type C power park modules shall fulfil the following additional requirements in relation to grid forming capability To erase last words "in relation to grid forming capability" To add: When imposed by ACER or NRA</p>

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

	Text amendment proposal (if applicable)
New provision	

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**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	

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## 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		<p>AC-connected offshore power park modules shall fulfil the requirements relating to frequency stability laid down in Articles 13, 15(2) and 21 (2), except for Article 13(2)(b), (6) and (7) respectively.</p> <p>Which (6) and (7) of which article???</p> <p>Art. 15(6) and 21(7) do not exist</p> <p>TO CORRECT</p>
Article 25		<p>In paragraph 1:</p> <p>within the ranges of the network voltage at the OFFSHORE connection point,</p> <p>To insert the word "offshore"</p>
Article 26		
Article 27		
Article 28		

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

	Text amendment proposal (if applicable)
New article	

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## TITLE III - Operational notification procedure for connection

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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]	Comment: To increase readability, to add the provision for EV1 if this notion remains in the NC	
Article 30b [new]		
Article 31		
Article 32		
Article 33		
Article 34		
Article 35	Comment: Do not accept to erase this. If erased, Art. 7.8 about appeal will apply with an identical result.	Add the old provision 4 in the RfG V2 QUOTE "An extension of the period during which the power-generating facility owner may maintain ION status, beyond the period established in paragraph 4, may be granted if a request for a derogation is made to the relevant system operator before the expiry of that period in accordance with the derogation procedure laid down in Article 60."
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	

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## TITLE IV - Compliance

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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	<p>Comment:</p> <p>Nothing is specified about compliance testing for type A. Is this the intention?</p> <p>in 1:</p> <p>The expression "LFSM-U-ESM" is not defined.</p>	
Article 48		
Article 49		
Article 50		
	<p>In 2 (b):</p> <p>QUOTE</p> <p>the simulation shall be carried out by means of high frequency steps and ramps reaching minimum regulating level, taking into account the droop settings and the deadband;</p> <p>UNQUOTE</p> <p>Why to erase this? Original text seems logic to me.</p> <p>See also next Art. for type C</p>	

Article 51	<p>in 2 (d):  QUOTE  The relevant TSO has the right to request a stability compliance. UNQUOTE  Comment: What does this mean?  What kind of simulation is this?</p> <p>In 3(a):  QUOTE  The relevant TSO has the right to request a stability compliance for reactive power capability control in a closed loop operation set up of the synchronous power-generating module. UNQUOTE  Comment: What does this mean. What kind of simulation is this?</p> <p>In 6:  QUOTE  With regard to the simulations on the system restoration  UNQUOTE  Comment: Who should perform this simulation. A normal power generating module has defined limits (min and max) on short circuit capacitance within the connection agreement. Nothing is specified for system restoration.</p>	<p>REIMPOSE THE ORIGINAL TEXT OF THE OLD RfG NC.</p> <p>To erase topic 2(d)</p> <p>To erase topic 6</p>
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Article 52	<p>Comment at 4(a): this is not a result of the expert group ISSM. It was only specified for 50 Hz, not for the complete frequency range</p>	<p>Topic 4(a) has to be erased. The sentence "In addition to point (b) of Art 51(2) as well as point (c) of Art 52(2), the power-generating module shall demonstrate its technical capability to control stably the frequency within the frequency range specified in Table 2 in island operation in parallel to a load, based on FSM. Load steps leading to active power increase and decrease between 0% and 2% shall be considered; the control structure and parameters that are applied during normal grid operation shall be applied during island operation. If parameter changes are necessary, they shall not affect the damping or small-signal stability;" has never been a part of the report of the ISSM expert group.</p>
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	

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## TITLE V - Derogations

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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	<p>This version of the RfG NC describes two areas completely new in the electricity world : RoCoF and Grid Forming Converters. In order to correct mistakes in this code, two possibilities exist: or by an IGD or by a derogation. IGDs have no mandatory power. Derogations at EU level are not described in this code.</p> <p>vgbe proposes to give ACER the authority to introduce a derogation at the level of the European Union, added to the existing national ones and persisting during the lifetime of the concerned PGMs.</p>	<p>To add:</p> <p>ACER can introduce a derogation at the level of the European Union in a similar process as NRAs for a derogation persisting during the lifetime of the concerned PGMs.</p>
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	

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

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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

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## TITLE VII - Final provisions

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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	

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## Other additional provisions

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

	Text amendment proposal (if applicable)
Other new provisions	

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## 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)