

# Proposals for amendments to the Requirements for Generators

Fields marked with \* are mandatory.

## Introduction

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 aims to transparently indicate to stakeholders the key policy areas in which amendments are to be expected. Moreover, the Paper draws on the alternative policy options and provides recommendations and proposed actions for the amendment process.

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

This consultation aims at gathering, from all interested stakeholders, concrete proposals for 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 amendment proposals concerning Network Code on Demand Connection, please go to the form: [NC DC](#).

**Responses to this consultation should be submitted by 28 November 2022 23:59 CET.**

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

\* Name of the stakeholder:

Edison S.p.A.

\* Contact person:

[REDACTED]

\* Contact person's email address:

[REDACTED]

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

Italy

\* 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:

[REDACTED]

\* 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, drafting team members, and other persons or entities involved in the European Grid Connection Network Codes amendment process)

## Instructions

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Stakeholders are invited to submit their amendment proposals to the RfG articles that they consider should be revised in a two-step process:

1. by inserting the proposed amendments in the provided Word file
2. by motivating/reasoning the proposed amendments through this online consultation form.

**Both steps are mandatory for all amendment proposals.**

(Where no amendment is proposed, the article text in the word file can be left unaltered and the cells in the consultation form can be left blank.)

The mandatory steps for submitting amendment proposals are detailed below. At the end of this section, you can find an example showing how to submit your proposals.

### ***Step 1***

Please include all your amendment proposals in the **Word file provided below using the Track Changes mode**. Once you edit the file and rename it with your stakeholder's name ("NC\_RfG\_stakeholder\_name"), please upload it in the last section of this form (FILE UPLOAD)

### **[Download the Word file \(NC RfG\)](#)**

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### ***Step 2***

In addition, please use this form to motivate/reason your proposals, following the instructions:

## General requirements for type B power-generating modules

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 14(1)	1	2	3
Article 14(2)			
Article 14(3)			
Article 14(4)			
Article 14(5)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
4	New provisions		

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5 Select file to upload

1. Propose an amended wording of the relevant provision, as you provided in the Word file.
2. Provide the motivation/reasoning behind your proposal.
3. Indicate (if any) which other provisions of the NC RfG are impacted and may need to be amended following your proposal.
4. Provide (if any) your proposals for adding new provisions to the relevant section of the Regulation, as you provided in the Word file.
5. Upload figures or tables if necessary; text inputs should be provided directly in the consultation form.

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## Example

Stakeholder XYZ would like to propose an amendment to Article 27 of NC RfG. In their view, the meaning of the word "respectively" in this article is not clear. Following a two-step process, the stakeholder downloads the Word file from the **Instruction** section, turns on the Track Changes mode and edits the text (first step).



#### Article 27

##### **System restoration requirements applicable to AC-connected offshore power park modules**

The system restoration requirements laid down respectively in Article 14(4) and Article 15(5) shall apply to AC-connected offshore power park modules types B and C, respectively.

#### Article 28

##### **General system management requirements applicable to AC-connected offshore power park modules**

The general system management requirements laid down in Article 14(5), Article 15(6) and Article 16(4) shall apply to AC-connected offshore power park modules.

After saving the edited file on their device under the name "*NC\_RfG\_Stakeholder\_XYZ*", the stakeholder uploads it in the **FILE UPLOAD** section.

### Pages

Introduction	Instruction	Whereas	Definitions	TITLE I	TITLE II CH. 1	TITLE II
TITLE III	TITLE IV	TITLE V	TITLE VI	TITLE VII	Other	<b>FILE UPLOAD</b>

## FILE UPLOAD

Please upload the Word file (downloaded from the *Instruction* section) containing all your amendments

The maximum file size is 1 MB

NC\_RfG\_Stakeholder\_XYZ.docx

Select file to upload

Previous

Submit

The stakeholder proceeds to motivate/reason their proposal. As they would like to propose an amendment to Article 27 of NC RfG, they enter **TITLE II CHAPTER 4** Section and insert the proposed amended wording and the reasoning (second step). As the proposed amendment of Article 27 does not affect other provisions, they leave the last column blank.

## Pages

[Introduction](#)[Instruction](#)[Whereas](#)[Definitions](#)[TITLE I](#)[TITLE II CH. 1](#)[TITLE II CH. 2](#)[TITLE II CH. 3](#)[TITLE II CH. 4](#)[TITLE III](#)[TITLE IV](#)[TITLE V](#)[TITLE VI](#)[TITLE VII](#)[Other](#)[FILE UPLOAD](#)

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

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 23	//	//	//
Article 24	//	//	//
Article 25	//	//	//
Article 26	//	//	//
Article 27	The system restoration requirements laid down in Article 14(4) and Article 15(5) shall apply to AC-connected offshore power park modules types B and C, respectively.	The current wording of Article 27 refers to the provisions of Articles 14(4) and 15(5). However, it is unclear from the legal text how the respective application should be understood. Indicating that the requirements of Article 14(4) shall apply to offshore PPMs type B and requirements of Article 15(5) shall apply to offshore PPMs type C follows the internal logic of the NC RfG and corresponds with the capabilities of the units in question.	- //
Article 28	//	//	//

As the survey is long,

1. you have the possibility to edit your answer after submission. When clicking on "submit", you will be given a contribution ID, which you can then use to access your contribution here. This allows you to proceed in steps.
2. 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 amendment proposal and the reasoning in the table below.

Numbers in the first column correspond with the recitals of the NC RfG Whereas section

	Amendment proposal	Reasoning	Relation to other provisions
(1)			
(2)			
(3)			
(4)			
(5)			
(6)			
(7)			
(8)			
(9)			
(10)			
(11)			
(12)			
(13)			
(14)			
(15)			
(16)			
(17)			
(18)			
(19)			
(20)			
(21)			
(22)			
(23)			
(24)			
(25)			

(26)			
(27)			
(28)			
(29)			
(30)			
(31)			



Please write your amendment proposal and the reasoning in the table below.

	Proposal for new recitals	Reasoning	Relation to other provisions
New recitals			



Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
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(11)			
Article 2(12)			
Article 2(13)			
Article 2(14)			
Article 2(15)			
Article 2(16)			
Article 2(17)			
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)			
Article 2(34)			
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)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new definitions	Reasoning	Relation to other provisions
	<p>1) Use or refer to the definition of 'energy storage', included in Directive (UE) 2019/944: "...in the electricity system, deferring the final use of electricity to a time later than when it was generated, or the conversion of electrical energy into a form of energy that can be stored, the storage of that energy and the subsequent reconversion of that energy into electrical energy or its use as another energy carrier"</p> <p>2) 'storage equipment' means equipment in an installation that makes it possible to store energy and defer its injection into the grid, regardless of whether it is connected to a consumer's internal grid and regardless of whether it has the technical and legal capacity to be reversible. It may be a synchronous or an electrical park, depending on whether it uses synchronous generators or inverters to connect to the grid respectively. It may be connected to the grid independently or in a</p>		

hybrid installation.

3)

Useful Capacity Storage System:  
the amount of energy that a  
storage system is able to  
exchange with the grid at the point  
of delivery. The useful capacity of  
a storage system can vary over the  
lifetime of the system.

4)

Maximum discharge power:  
Maximum active power that a  
storage system can deliver to the  
grid at the point of delivery; it can  
vary depending on the SOC.

5)

Maximum charging power:  
Maximum active power that a  
storage system can withdraw from  
the grid at the point of delivery; it  
can vary depending on the SOC.

6)

'hybrid installation' means an  
installation with access to the  
same grid point consisting of one  
or more electricity generation  
modules and one or more storage  
equipment using different  
generation and/or storage  
technologies. In the case of

1)

These definitions are incorporated  
to develop Article 5 and include  
storage facilities.

2)

These definitions are incorporated  
to develop Article 5 and include  
storage facilities.

3)

These definitions are incorporated  
to develop Article 5 and include

New definitions	hybridization with storage, there could be two cases: the storage evacuating or consuming, if it has technical and legal capacity, its energy to the grid through its own alternators or electronic converters; or the storage and the power generation modules as a whole evacuating or consuming, if it has technical and legal capacity, its energy to the grid through its own or shared alternators or electronic converters. In the first case, the storage equipment is considered separately from any electricity generation module constituting the hybrid installation for the purposes of the applicability of technical requirements, information exchanges and measurements. In the second case, the technical requirements shall apply to the generation module plus storage equipment.	storage facilities.	1) Article 5, 6
		4) These definitions are incorporated to develop Article 5 and include storage facilities.	2) Article 5, 6
		5) These definitions are incorporated to develop Article 5 and include storage facilities.	3) Article 5, 6
		6) These definitions are incorporated to develop Article 5 and include storage facilities.	4) Article 5
		7) These definitions are incorporated to elaborate on Article 3 in which the exemptions are integrated.	5) Article 5
		8) These definitions are incorporated to develop Article 5 and include citizen energy communities	6) Article 5
	7) Use or refer to the definition of 'fully integrated network components', included in Directive (UE) 2019/944: "...network components integrated into the transmission or distribution system, including storage facilities, which are used for the sole	9) These definitions are incorporated to develop Article 5 and include Electric vehicle charging points	7) Article 3
		10) These definitions are incorporated	8) Article 5
			9) Article 5
			10) Article 5
			11) Article 5



purpose of ensuring secure and reliable operation of the transmission or distribution system, and not for balancing or congestion management purposes”

8)

Use or refer to the definition of 'citizen energy community', included in Directive (UE) 2019 /944 “...a legal entity which: (a) is based on voluntary and open participation and is effectively controlled by partners or members who are natural persons, local authorities, including municipalities, or small enterprises, (b) whose primary objective is to deliver environmental, economic or social benefits to its members or partners or to the locality in which it operates, (c) is involved in the generation, including from renewable sources, distribution, supply, consumption, aggregation, storage of energy, the provision of energy efficiency services or the provision of electric vehicle charging or other energy services to its members or partners”

9)

'Electric vehicle charging point or installation' means the

to develop Article 5 and include Electrical charging points

11)

These definitions are incorporated to develop Article 5 and include Electrical charging points

infrastructure necessary to safely conduct electrical energy between the electricity supply grid and the electric vehicle.

10)

'one-way electric vehicle charging point or installation' means the infrastructure necessary to safely conduct electrical energy from the electricity supply grid to the electric vehicle with demand-only behavior.

11)

'bi-directional electric vehicle charging point or installation' means the infrastructure necessary to conduct electrical energy safely from the electricity supply grid to the electric vehicle and from the electric vehicle to the electricity supply grid with both generation and demand behavior.

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## TITLE I - General provisions

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Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 1			
Article 3	<p>Art. 3 par. 1 and 2 (d) Inclusion of electricity storage modules into the scope of application of the NC RfG and treat them as PGMs. Electricity storage modules shall also comprise electric vehicles when connected to the grid (see proposal for definition in Art. 2)</p> <p>Art. 3.1: “The connection requirements set out in this Regulation shall apply to new power-generating modules and new electricity storage modules which are considered significant in accordance with Article 5, unless otherwise provided.”</p> <p>Art. 3.2 (d): Delete this point</p>	<p>Electricity storage have an increasing significance for the power system and have the capability to provide many grid supporting functions. Electric vehicles which are capable of injecting energy in the grid are to be considered energy storage modules for the connection to the grid.</p>	<p>Article 2 NC RfG (new provision as proposed above)</p>

Article 4		<p>Edison believes that the current approach of Article 4(1) of NC RfG on the definition of significant modernisation, leaving room for different interpretations at national level, is the best suited to take into account national specificities. Therefore, we do not agree on the need to update these provisions to introduce further harmonisation at EU level.</p> <p>In case ACER deems it appropriate to further harmonise the criteria used to identify significant modernisations, Edison believes that only electrical characteristics that lead to an increased ability to provide a particular service should be considered (e.g. the frequency stability and the active power management, the reactive power capability and/or the short-circuit current of the PGM /demand facility) and not the simple change of components /assets and/or the maximum capacity of the units since these latter interventions don't fundamentally impact the ability to provide a service.</p>	
	2. Power-generating modules within the following categories		

shall be considered as significant:

- (a) connection point below 110 kV and maximum capacity of 0,8 kW or more (type A);
- (b) maximum capacity at or above a threshold proposed by each relevant TSO in accordance with the procedure laid out in paragraph 3 (type A+). This threshold shall not be above the limits for type A+ power-generating modules contained in Table 1;
- (c) maximum capacity at or above a threshold proposed by each relevant TSO in accordance with the procedure laid out in paragraph 3 (type B). This threshold shall not be above the limits for type B power-generating modules contained in Table 1;
- (d) maximum capacity at or above a threshold specified by each relevant TSO in accordance with paragraph 3 (type C). This threshold shall not be above the limits for type C power-generating modules contained in Table 1; or
- (e) maximum capacity is at or above a threshold specified in accordance with paragraph 3. This threshold shall not be above the limit for type D power-generating modules contained in Table 1.

## Article 5

6. Standalone storage facilities shall be assessed taking into account the maximum injection capacity, but in addition they must meet the technical requirements as demand for maximum import capacity for the purposes of Regulation (EU) 2016/1388.

7. In the case of power park modules that are joined to form an economic unit and share a connection point, the assessment of their significance shall be made according to their aggregated capacity, whereby their significance shall be assessed according to the sum of the maximum capacity of each power park module that is connected at the same connection point.

8. In the case of energy communities, electricity generation modules belonging to the same energy community, the generators shall be counted in an aggregated way, exclusively by the maximum capacity without considering the voltage of the connection point of the associated demand-side installation.

9. Bi-directional recharging points

In our view, the current requirements foreseen for type A PGMs are sufficient for small PGMs which are usually installed in residential environment, taken into account their limited effect on the system. Thus, the additional technical requirements identified by the Expert Group “Baseline for Type A PGMs” should not be applied to these plants. Nevertheless, Edison shares the need to revise the threshold between type A and B PGMs and to consider the opportunity to introduce another intermediate PGMs type between type A and type B. Therefore, we suggest to: i) add another PGM type between type A and B (e.g. A+) for industrial sites. This new PGMs type should encompass, for example, PGMs between 100 kW and 600 kW and, thus, it should be subject to more extensive technical requirements (e.g. FRT) than type A; ii) harmonize at European level capacity threshold between types A and A+, for example, to 100 kW. In this way, type A should include mostly residential plants for which technical requirements already in place for type A seem to be sufficient to ensure system security.

	shall be subject on the grid feed-in side to the requirements for generators in this Regulation while being subject to the technical requirements as demand for maximum import capacity within the meaning of Regulation (EU) 2016/1388.		
Article 6			
Article 7			
Article 8			
Article 9			
Article 10			
Article 11			
Article 12			



Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

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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 amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 13(1)			
Article 13(2)			
Article 13(3)			
Article 13(4)			
Article 13(5)			
Article 13(6)			
Article 13(7)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
	<p>For type A+ installations, the following data should be provided to the system operator, to foster flexibility and in any case to develop the relevant regulation by Member States to make it possible.</p> <p>Measures:</p> <p>MV/LV Voltage (kV)</p> <p>MV/LV Current (A)</p> <p>Active Power (MW)</p> <p>Reactive Power (MVA<sub>r</sub>)</p> <p>Frequency (Hz)</p> <p>Command acknowledge</p> <p>Injection Power Limit Acknowledge - "Plim active ack."</p> <p>Binary Inputs:</p>		

New provisions	<p>Circuit breaker state Protection start (aggregated) Protection trip (aggregated) Communication failure</p> <p>Commands: Live Line Work Conditions Grid disconnection / Permission to connect Network Injection Power Limit</p> <p>Technical requirements for type A+: a) Fault Ride Through (FRT), b) Post Fault Active Power Recovery (PFAPR), c) Active Power Control (APC), d) undervoltage-ride-through (UVRT) e) overvoltage-ride-through (OVRT)</p>	<p>In our view, the current requirements foreseen for type A PGMs are sufficient for small PGMs which are usually installed in residential environment, taken into account their effect on the system. Thus, the additional technical requirements identified by the Expert Group “Baseline for Type A PGMs” should not be applied to these plants. Nevertheless, Edison shares the need to revise the threshold between type A and B PGMs and to consider the opportunity to introduce another intermediate PGMs type between type A and type B. Therefore, we suggest to: i) add another PGM type between type A and B (e.g. A+) for industrial sites. This new PGMs type should encompass, for example, PGMs between 100 kW and 600 kW and, thus, it should be subject to more extensive technical requirements (e.g. FRT) than type A; ii) harmonize at European level capacity threshold between types A and A+, for example, to 100 kW. In this way, type A should include mostly residential plants for which technical requirements already in place for type A seem to be sufficient to ensure system security.</p>	
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**General requirements for type B power-generating modules**

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 14(1)			
Article 14(2)			
Article 14(3)			
Article 14(4)			
Article 14(5)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			



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

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 15(1)			
Article 15(2)			
Article 15(3)			
Article 15(4)			
Article 15(5)			
Article 15(6)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 16(1)			
Article 16(2)			
Article 16(3)			
Article 16(4)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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

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

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 17(1)			
Article 17(2)			
Article 17(3)			



Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 18(1)			
Article 18(2)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 19(1)			
Article 19(2)			
Article 19(3)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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

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### Requirements for type B power park modules



Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 20(1)			
Article 20(2)			
Article 20(3)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

Please upload figures or tables if necessary

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### **Requirements for type C power park modules**

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 21(1)			
Article 21(2)			
Article 21(3)			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			

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### **Requirements for type D power park modules**

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 22			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions in this section	Reasoning	Relation to other provisions
New provisions			



Please upload figures or tables if necessary

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

Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 23			
Article 24			
Article 25			
Article 26			
Article 27			
Article 28			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

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## TITLE III - Operational notification procedure for connection

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Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 29			
Article 30			
Article 31			
Article 32			
Article 33			
Article 34			
Article 35			
Article 36			
Article 37			
Article 38			
Article 39			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

Please upload figures or tables if necessary

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## TITLE IV - Compliance

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Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
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 proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

Please upload figures or tables if necessary

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## TITLE V - Derogations

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Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 60			
Article 61			
Article 62			
Article 63			
Article 64			
Article 65			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

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## TITLE VI - Transitional arrangements for emerging technologies

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Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 66			
Article 67			
Article 68			
Article 69			
Article 70			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

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## TITLE VII - Final provisions

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Please write your amendment proposal and the reasoning in the table below.

	Amendment proposal	Reasoning	Relation to other provisions
Article 71			
Article 72			

Please write your amendment proposal and the reasoning in the table below.

	Proposal for new articles in this section	Reasoning	Relation to other provisions
New articles			

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## Other additional provisions

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Please write your amendment proposal and the reasoning in the table below.

	Proposal for new provisions	Reasoning	Relation to other provisions
Other new provisions			

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## FILE UPLOAD

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Please upload the Word file (downloaded from the **Instruction** section) containing all your amendment proposals in the Track Changes mode.

The maximum file size is 1 MB

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