

# 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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\* Name of the stakeholder:

Svensk Solenergi

\* Contact person:

[REDACTED]

\* Contact person's email address:

[REDACTED]

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

Sweden

\* 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:

Trade organisation

\* 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		

Please upload your file if necessary

The maximum file size is 1 MB

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)			
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(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)			
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Article 2(42)			
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Article 2(48)			
Article 2(49)			
Article 2(50)			
Article 2(51)			
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Article 2(53)			
Article 2(54)			
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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
New definitions			

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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			
Article 4			
Article 5			
Article 6	<p>New point 6:</p> <p>6. For a PGM in mixed customer sites (MCS), the following applies:</p> <p>(a) The type classification according to paragraph 2, article 5, shall be based on the maximum feed-in capacity and not on the installed capacity</p> <p>(b) The voltage limit in paragraph 2 article 5 shall not be applied to MCS. The type classification of a PGM in a MCS shall be based only on power limit according to (a).</p>	<p>In order to encourage self-consumption and a better use of grid capacity, PGMs installed in mixed consumption sites (MCSs) should be classified based on the grid-connected capacity and not based on installed power.</p> <p>The voltage limit of 110 kV for type A-C PGMs should be removed for MSC as the voltage level is most often applicable to the consumption rather than production. The limit on power capacity is sufficient on its own.</p>	
	<p>1. Requirements of general application to be established by relevant system operators or TSOs under this Regulation shall be subject to approval by the entity designated by the Member State and be published. The designated entity shall be the regulatory authority unless otherwise provided by the Member State. The relevant system operator can</p>		



Article 7

not apply more stringent requirements to PGMs than defined in this regulation unless the national regulatory authority has evaluated and approved the requirements in consultation with relevant stakeholders.

2. For site specific or regional requirements to be established by relevant system operators or TSOs under this Regulation, Member States may require approval by a designated entity.

3. When applying this Regulation, Member States, competent entities and system operators shall:

- (a) apply the principles of proportionality and non-discrimination;
- (b) ensure transparency;
- (c) apply the principle of optimisation between the highest overall efficiency and lowest total costs for all parties involved;
- (d) respect the responsibility assigned to the relevant TSO in order to ensure system security, including as required by national legislation;
- (e) consult with relevant DSOs and take account of potential impacts on their system;
- (f) take into consideration agreed European standards and

In order to enable the energy transition, it is critical that requirements from system operators on PGMs are harmonized within a country. The regulatory authority in each member state should take over the responsibility to specify requirements instead of each system operator. If additional requirements, other than stated in the regulation, are necessary to obtain safe operation of a system, these additional requirements should first be evaluated by the regulatory authority in consultation with relevant stakeholders to examine whether they are necessary or not.

	technical specifications. (g) Harmonize the requirements within a member state .		
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)	<p>2 (b): instead of the capability referred to in paragraph (a), the relevant TSO may, unless there is a market based solution dealing with the issue, choose to allow within its control area automatic disconnection and reconnection of power-generating modules of Type A at randomised frequencies, ideally uniformly distributed, above a frequency threshold, as determined by the relevant TSO where it is able to demonstrate to the relevant regulatory authority, and with the cooperation of power-generating facility owners, that this has a limited cross-border impact and maintains the same level of operational security in all system states;</p>	<p>Article 13, 2 b) c) about requiring some means of advanced control on type A PGMs is problematic because the randomization for ramp down at over frequency suggested might cause significant cost which is difficult to bear for small systems. Furthermore the frequency range suggested of 50.2-50.5 Hz for this is in the withing the band of FCR-D down which is a market solution, thus voluntary. Mandatory regulation in the range of frequency regulation handled on markets is not a good idea. If the system operator wants to control a PGM this must be based on an agreement between the parties.</p>	
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
New provisions			

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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			

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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			

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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	<p>2. The regulatory authority relevant system operator shall specify the content of the installation document used in the member state, which shall have at least the following information:</p> <ul style="list-style-type: none"> <li>(a) the location at which the connection is made;</li> <li>(b) the date of the connection;</li> <li>(c) the maximum capacity of the installation in kW;</li> <li>(d) the type of primary energy source;</li> <li>(e) the classification of the power-generating module as an emerging technology according to Title VI of this Regulation;</li> <li>(f) reference to equipment certificates issued by an authorised certifier used for equipment that is in the site installation;</li> <li>(g) as regards equipment used, for which an equipment certificate has not been received, information shall be provided as directed by the relevant system operator; and</li> <li>(h) the contact details of the power-generating facility owner and the installer and their signatures.</li> </ul>	<p>To accomplish the energy transition that the Europe just have started, an enormous number of small power generating modules (PGM) needs to be Installed in a rapid pace. To simplify for grid companies and installers, the administration for connecting small PGMs must be kept to an absolute minimum. For that reason, ACER should consider removing the requirement of an installation document for type A PGMs or at least remove unnecessary mandatory information from the Installation document, such as customer signature. The proposal to place the same requirement on type A PGMs as for type B PGMs should be removed.</p> <p>The regulatory authority should decide what is relevant for the Installation document in each country. In Sweden, for example, there is no need for contact information to the customer and installer since the grid company already have this information.</p>	
Article 31			

Article 32	2. The format of the PGMD and the information to be given therein shall be specified by the regulatory authority relevant system operator. The relevant system operator shall have the right to request that the power-generating facility owner include the following in the PGMD:	In order to enable the energy transition, it is critical that requirements from system operators on PGMs are harmonized within a country. The regulatory authority in each member state should take over the responsibility to specify requirements instead of each system operator.	
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			

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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			

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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	4. The relevant system operator can not apply requirements other than defined in this regulation unless the national regulatory authority has evaluated and approved the requirements in consultation with relevant stakeholders.	In order to enable the energy transition, it is critical that requirements from system operators on PGMs are harmonized within a country. The regulatory authority in each member state should take over the responsibility to specify requirements instead of each system operator. If additional requirements, other than stated in the regulation, are necessary to obtain safe operation of a system, these additional requirements should first be evaluated by the regulatory authority in consultation with relevant stakeholders to examine whether they are necessary or not.	
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.

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## Contact

[Contact Form](#)



