

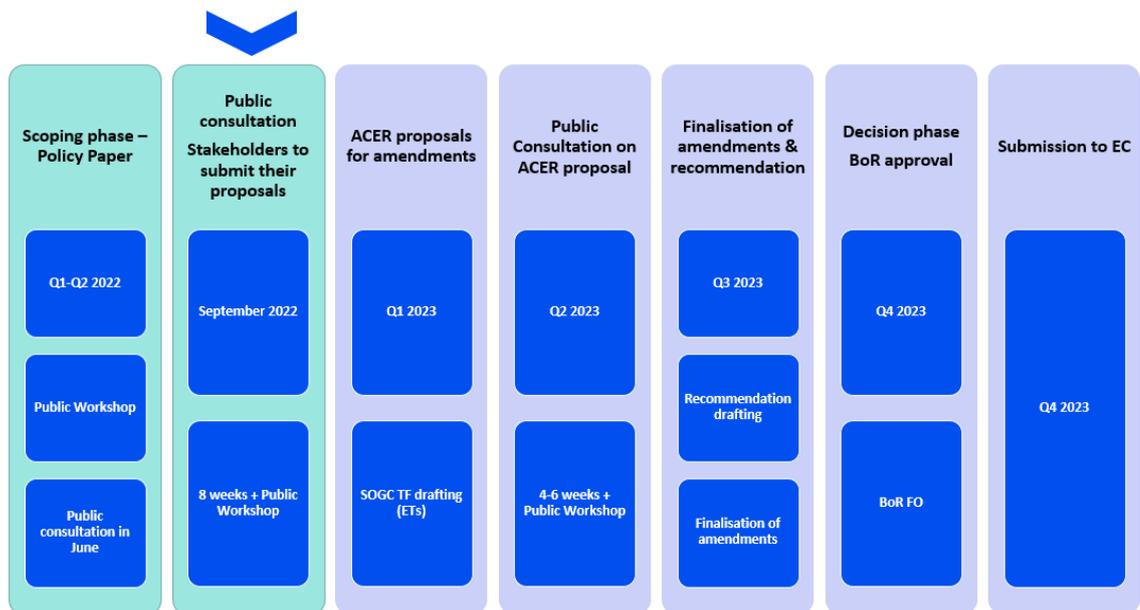
# Proposals for amendments to the Demand Connection Code

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) 2016/1388 of 17 August 2016 establishing a **Network Code on Demand Connection** ('NC DC').

For amendment proposals concerning Network Code on Requirements for Generators ('NC RfG'), please go to the form: [NC RfG](#).

**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:

VDE FNN

\* Contact person:

[REDACTED]

\* Contact person's email address:

[REDACTED]

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

Germany

\* 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:

Technical regulator in Germany (in charge of developing the Grid Codes)

\* 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 NC DC 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\_DC\_stakeholder\_name"), please upload it in the last section of this form (FILE UPLOAD)

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

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### ***Step 2***

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

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 |
|----------------|---|-----------|------------------------------|
| New provisions |   |           |                              |

Please upload your file if necessary

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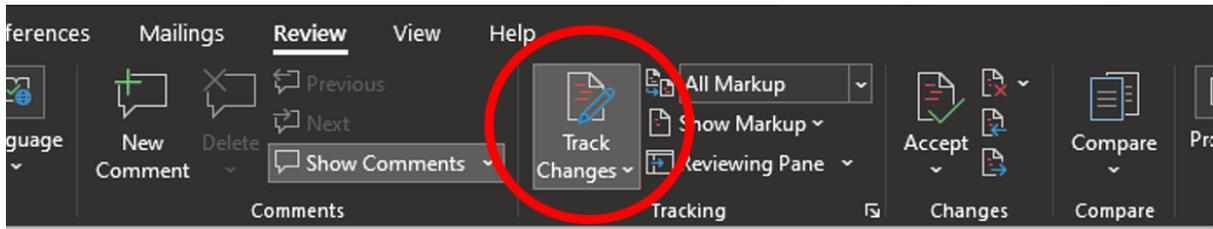
5 Select file to upload

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 DC 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.

## Example

*This section shows an example of an input to the survey on the NC RfG. The input process is the same for the NC DC survey.*

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**

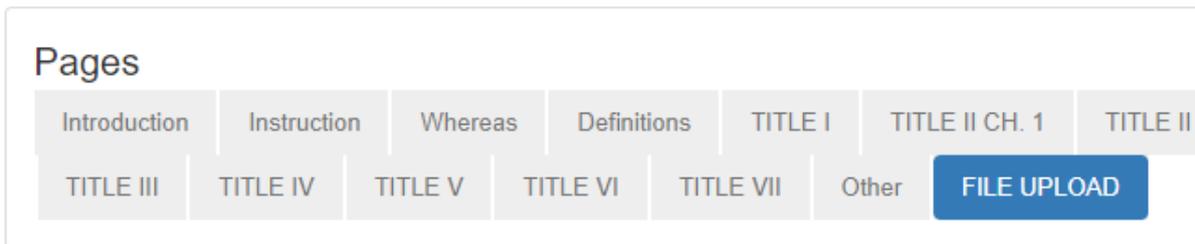
The system restoration requirements laid down **respectively** in Article 14(4) and Article 15(5) shall apply to AC-connected offshore power park modules types B and C, respectively.

*Article 28*

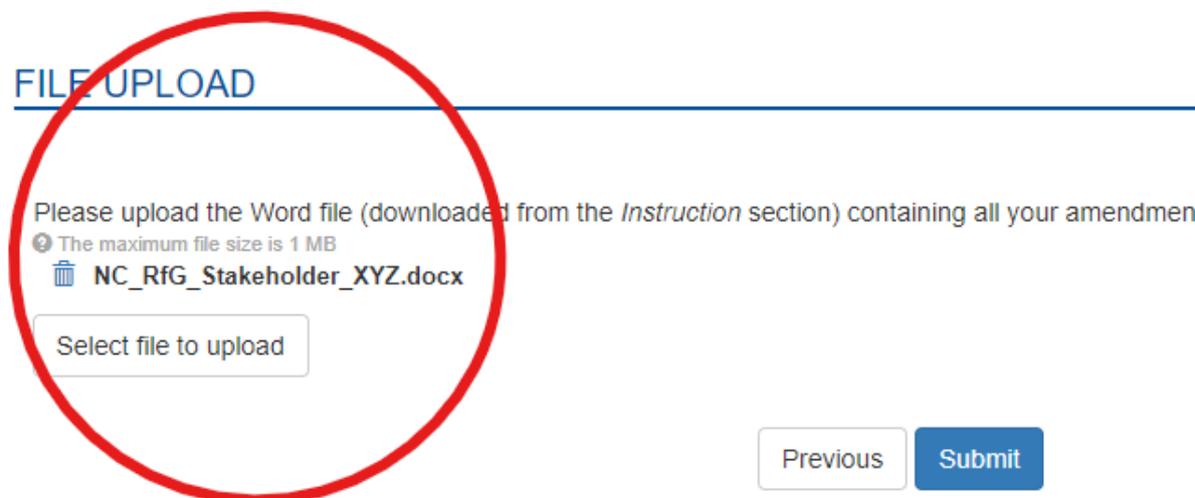
**General system management requirements applicable to AC-connected offshore power park modules**

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.



**FILE UPLOAD**



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 DC 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) |                    |           |                              |

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) |                    |           |                              |

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

|                 | Proposal for new definitions   | Reasoning   | Relation to other provisions |
|-----------------|--|---|------------------------------|
| New definitions | <p>New definition for "dispatchable load":</p> <p>‘dispatchable load’ means a load for which the active power consumption can be modified while maintaining the functionality of that load within an acceptable range of parameters.</p> | <p>A definition for dispatchable load is necessary to support the amendment to Article 12 and it is taken from IEC-DTS 62898-3-3.</p> | na                           |

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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  |                    |           |                              |
| Article 7  |                    |           |                              |
| Article 8  |                    |           |                              |
| Article 9  |                    |           |                              |
| Article 10 |                    |           |                              |
| Article 11 |                    |           |                              |

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 provisions |   |           |                              |

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## **TITLE II - Connection of transmission-connected demand facilities, transmission-connected distribution facilities and distribution systems**

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

|            | Amendment proposal   | Reasoning  | Relation to other provisions  |
|------------|--|--|---|
| Article 12 | <p>Include LFSM-U for dispatchable loads such as electric vehicle charging stations, new section Article 12 (3):</p> <p>3. The following shall apply for dispatchable loads (such as electric vehicle charging stations) in accordance with the limited frequency sensitive mode — underfrequency (LFSM-U) requirements in the Commission Regulation (EU) 2016/631 as determined by the relevant TSO for its control area in coordination with the TSOs of the same synchronous area to ensure minimal impact on neighbouring areas:</p> <p>(a) the dispatchable load shall be capable of activating the provision of active power frequency response at a frequency threshold and droop settings specified by the relevant TSO.</p> | <p>Dispatchable loads such as electric vehicle charging stations have an increasing significance for the power system and can provide a large contribution to LFSM-U with little extra cost.</p> <p>This is considered state of the art and already considered in several national implementations of NC RfG for example VDE-AR-N 4110 in Germany.</p> | <p>LFSM-U provision in Article 13 (new 3 according to VDE FNN Amendment Proposal) in NC RfG which transfers to Type A PGMs in Article 13.</p> |
| Article 13 |  |  |   |
| Article 14 |  |  |   |
| Article 15 |  |  |   |
| Article 16 |  |  |   |
| Article 17 |  |  |   |

|            |  |  |  |
|------------|--|--|--|
| Article 18 |  |  |  |
| Article 19 |  |  |  |
| Article 20 |  |  |  |
| Article 21 |  |  |  |
| Article 22 |  |  |  |
| Article 23 |  |  |  |
| Article 24 |  |  |  |
| Article 25 |  |  |  |
| Article 26 |  |  |  |

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 provisions |   |           |                              |

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## TITLE III - Connection of demand units used by a demand facility or a closed distribution system to provide demand response services to system operators

---

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

|            | Amendment proposal | Reasoning | Relation to other provisions |
|------------|--------------------|-----------|------------------------------|
| Article 27 |                    |           |                              |
| Article 28 |                    |           |                              |
| Article 29 |                    |           |                              |
| Article 30 |                    |           |                              |
| Article 31 |                    |           |                              |
| Article 32 |                    |           |                              |
| Article 33 |                    |           |                              |

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 provisions |   |           |                              |

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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 34 |                    |           |                              |
| Article 35 |                    |           |                              |
| Article 36 |                    |           |                              |
| Article 37 |                    |           |                              |
| Article 38 |                    |           |                              |
| Article 39 |                    |           |                              |
| Article 40 |                    |           |                              |
| Article 41 |                    |           |                              |
| Article 42 |                    |           |                              |
| Article 43 |                    |           |                              |
| Article 44 |                    |           |                              |
| Article 45 |                    |           |                              |
| Article 46 |                    |           |                              |
| Article 47 |                    |           |                              |

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 provisions |   |           |                              |

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## TITLE V - Applications and 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 48 |                    |           |                              |
| Article 49 |                    |           |                              |
| Article 50 |                    |           |                              |
| Article 51 |                    |           |                              |
| Article 52 |                    |           |                              |
| Article 53 |                    |           |                              |
| Article 54 |                    |           |                              |
| Article 55 |                    |           |                              |

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 provisions |   |           |                              |

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## TITLE VI - Non-binding guidance and monitoring of implementation

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

|            | Amendment proposal | Reasoning | Relation to other provisions |
|------------|--------------------|-----------|------------------------------|
| Article 56 |                    |           |                              |
| Article 57 |                    |           |                              |

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 provisions |   |           |                              |

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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 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 provisions |   |           |                              |

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## ANNEX I

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

|                       | Proposal for new articles in this section | Reasoning | Relation to other provisions |
|-----------------------|---|-----------|------------------------------|
| Amendments to Annex I |   |           |                              |

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## ANNEX II

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

|                        | Proposal for new articles in this section | Reasoning | Relation to other provisions |
|------------------------|---|-----------|------------------------------|
| Amendments to Annex II |   |           |                              |

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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 **Instructions** section) containing all your amendment proposals in the Track Changes mode.

The maximum file size is 1 MB

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### Contact

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