

# 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:

vgbe

\* 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:

[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)			
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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)	'power-generating facility' means a facility that converts primary energy into electrical energy in a controllable manner and which consists of one or more power-generating modules connected to a network at one or more connection points;	Excluding non-controllable injections such as recovery of breaking energy of trains,...	
Article 2(7)			
Article 2(8)			

Article 2(9)	'synchronous power-generating module' means an indivisible set of installations which can generate electrical energy such that the frequency of the generated voltage, the generator rotational speed and the frequency of network voltage are in a constant ratio and thus in synchronism; modules with individually controllable output have to be considered as individual machines for the determination of significance;	To specify more clearly so it is impossible that in some countries all synchronous machines at a single site are added for the classification	
Article 2(10)			
Article 2(11)			
Article 2(12)			
Article 2(13)			
Article 2(14)			
Article 2(15)			
Article 2(16)			
Article 2(17)	'power park module' or 'PPM' means a unit or ensemble of units generating electricity, connected through power electronics, and that also has a single connection point to a transmission system, distribution system including closed distribution system, a Mixed Customer Site or a HVDC system;	This definition has to be reviewed to exclude DFIM/DFIG with dedicated characteristics. By doing so, a chapter with the requirements for DFIM/DFIG is required	

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)	<p>'limited frequency sensitive mode — overfrequency' or 'LFSM-O' means a power-generating module operating mode which will result in active power output reduction in response to a increasing system frequency above a certain value;</p>	<p>HVDC is not a subject of this code An output reduction is the consequence of a frequency increase and not of a frequency change. If the frequency does down to 50 Hz again, the power has to go up.</p>	

Article 2(38)	'limited frequency sensitive mode — underfrequency' or 'LFSM-U' means a power-generating module or HVDC system operating mode which will result in active power output increase in response to a decreasing change in system frequency below a certain value;	unification spelling; HVDC is not a subject of this code An output increase is the consequence of a frequency decrease and not of a frequency change. If the frequency does up to 50 Hz again, the power has to go down.	
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
New definitions	<p>(66) 'Rate of Change of Frequency (RoCoF)' is the time derivative of the power system frequency (<math>df/dt</math>). It shall be measured during a sliding period of time, the classical value being 500 ms,</p> <p>(67) a 'Mixed Customer Site' is a site with one or several power-generating modules and consumption behind a single connection point. The auxiliary services of the power-generating module are not considered as consumption in this definition. This definition can be applied on CDSO and on non-CDSO sites.</p> <p>(68) a 'Synchronous Condenser' or a 'Synchronous Compensator' is a synchronous alternator supplying reactive power, inertia, robustness and short-circuit power to the network. It injects high currents during disturbances to stabilise the grid.</p> <p>(69) a 'Doubly (or Double) Fed Induction Machine /Generator</p>	<p>(69) Such a definition is missing. A DFIG is also used in wind turbines, a general definition and requirements are needed. The Art. for windturbines have to be added by other associations</p>	



	<p>(DFIM / DFIG)' can be operated in a generator mode and in the motor mode. Its stator is similar to the stator of a synchronous PGM and the windings in the rotor are energised by an inverter with a variable voltage and frequency. Theoretically it is a PPM but several characteristics are similar to those of a synchronous PGM. Currently, DFIM are installed or in pump-storage installations and DFIGs in wind turbines. The voltage and frequency ranges of the DFIM in pump-storage installations are depicted in this code taking into account the restrictions in Art. 6. The requirements for DFIGs in wind turbines are described in Art. ????</p>		
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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>TO ERASE</p> <p>(d) storage devices except for pump-storage power-generating modules in accordance with Article 6(2).</p>	<p>To erase by general acceptance of all stakeholders</p>	
	<p>1.</p> <p>(a) a power-generating module has been modified to such an extent that electrical and grid-dynamic interaction have significantly altered. In this case the following has to be applied:</p> <p>(i) power-generating facility owners who intend to undertake the modernisation of a plant or replacement of equipment impacting electrical characteristics of the power-generating module shall notify their plans to the relevant system operator in advance;</p> <p>(ii) if the relevant system operator considers that the extent of the modernisation or replacement of equipment is significant, in respect of any of the criteria in paragraph 1.c below, the system operator shall notify the</p>		

relevant regulatory authority or, where applicable, the Member State; and

(iii) the relevant regulatory authority or, where applicable, the Member State shall decide which requirements of this Regulation shall apply and if the existing connection agreement needs to be revised or replaced; or

(c) For the purposes of this article a significant alteration will be defined according to these parameters:

i. A percentage increase above the existing maximum capacity ( $P_{max}$ ) of the PGM to be defined by the relevant system operator in the range of 15% to 30%; or

ii. A percentage deviation from the existing required reactive capability of the PGM to be defined by the relevant system operator in coordination with the relevant TSO in the range of 15% to 30%; or

iii. A change in frequency stability (such as inertia) and active power management capabilities to be defined by the relevant TSO.

2. TO ERASE THIS SENTENCE;  
A Member State may provide that

#### Article 4

in specified circumstances the regulatory authority may determine whether the power-generating module is to be considered an existing power-generating module or a new power-generating module.

3. If significant factual changes in circumstances, such as the evolution of system requirements including penetration of renewable energy sources, smart grids, distributed generation or demand response, impose the application of this Regulation to existing power-generating modules, negotiations have to be conducted with the existing power-generating modules to define the costs of the required modifications, the bearer of the costs and the socioeconomical benefits.

8. Where parts or units of an existing power generating module are replaced or new parts or units added to an existing power generating module, those new or replacement parts or units should, to the extent applicable:

- (a) Be compliant with the requirements of this Regulation;
- (b) Not be a limitation on the eventual compliance of the power

1. (a) ERASE 'type C or type D' according to the ACER Policy Paper

Changes in 1. (a), (i), (ii) and (iii) as specified in the final report of this expert group CSM

1. (c) vgbe proposes this range to create a European level playing field and to respect efficiency improvements.

2. ERASE LAST SENTENCE

Usefull in the old version of RfG but not in the new version.

3. Several lines erased because not usefull in the new version of the code

8. vgbe proposes te erase the word "component" because it is not defined and could be interpreted too general.

9. The notion maintenance and spare parts are added by vgbe to avoid every misunderstanding. Internationally accepted notions such as specified in the IEC standard 13306 must be used in this text.

	<p>generating module should compliance be required with this Regulation in accordance with this article; and</p> <p>(c) Immediately contribute the requirements of this Regulation pro rata compared to the power generating module as appropriate (e.g. reactive power) to the future compliance of that power generating module for the possibility that compliance with this Regulation is required in the future.</p> <p>9. Paragraph 8 does not apply to maintenance activities or to spare parts, whether or not those parts are purchased at the time of their incorporation in the power generating module. The notions maintenance and spare parts are defined in common industrial practices and in international standards. Maintenance activities are commonly defined as “activities to retain or maintain the original required function of the item” and a spare part as “an item to replace a corresponding item in order to retain or maintain the original required function of the item”</p>		
		2. REGARDING THE NOTION	

2. Power-generating modules within the following categories shall be considered as significant:

- (a) with a maximum capacity above 0,8 kW (type A);
- (b) with a maximum capacity at or above a threshold proposed by each relevant TSO in accordance with paragraph 3 (type B). This threshold shall be in the range for type B power-generating modules contained in Table 1;
- (c) with a maximum capacity at or above a threshold specified by each relevant TSO in accordance with paragraph 3 (type C). This threshold shall be in the range for type C power-generating modules contained in Table 1; or
- (d) with a maximum capacity at or above a threshold specified by each relevant TSO in

## CONNECTION POINT

As specified in the Expert Group "Mixed Customer Sites" and "Hamonisation of certification and Family Grouping" the notion of Connection Point is surpassed in times where the European Green Deal should be applied, promoting Distributed Green Energy Resources.

The most important point is to check the characteristics of a PGM at its terminals. It seems logic that the characteristics of the PGM recalculated at the connection point should be communicated to the RSO.

Example: the characteristics of a 200kW 400V gasengine and connected to the MV grid by a 630 kVA transformer should be recalculated at the MV connection point by taking into account the characteristics of this transformer.

## DELETION of "below 110 kV"

The voltage criterion has to be erased due to a harmonisation of equipment installed at residential (LV connected), industrial locations (MV connected) and industrial locations connected at 110 kV or above.

It is already or will become

## Article 5

accordance with paragraph 3. This threshold shall be in the range for type D power-generating modules contained in Table 1.

Table 1 : see dedicated revised table

NEW SENTENCE BELOW THE TABLE:

For the use of this classification in the operational network codes such as SOGL and E&R, the lowest range in the second column of the table above can be changed in 10 kW.

NEW ADDITIONAL POINT 5:

5. Where power generating modules subjected to this regulation are modified such that their maximum capacity crosses the threshold, the power generating modules must then comply with the requirements of this Regulation applicable to the type within which the maximum capacity now lies. Member States have the right not to impose this provision for small changes in the characteristics.

6. TEXT FROM FORMER POINT 5.

common practice to add PV panels and wind turbines and storage at generation sites and consumer sites connected at 110 kV or above.

The voltage criterion is now considered as an injustice by the expert group "Mixed customer sites".

NOTION AT TITLE "TABLE 1"

The current classification in continental Europe is a disaster, destroying a level playing field. vgbe is convinced that ranges to define the threshold for the classification have to be imposed in the new RfG NC.

IN THE TABLE 1:

The value "?" has to be defined based on the future requirements for other PGM`s.

NOTE AT THE SENTENCE BELOW TABLE 1

This sentence is needed for Italy and Slovenia to keep the old thresholds (11.08 kW and 10 kW) in the SOGL and E&R. If both countries accept 100 kW as limit due to the additional requirements for type A PGMs, this sentence becomes useless.



		<p>NOTE AT POINT 5</p> <p>As specified in the report of the CSM expert group.</p> <p>Last sentence is added because in some rare circumstances, this could imply that a modification is not executed due to the increasing costs imposed by the higher classification.</p> <p>Such non-investment is NOT according to the European Green Deal.</p>	
	<p>2. Pump-storage power-generating modules shall fulfil the requirements in generating operation and pumping operation as described below:</p> <p>a) Pump-storage power-generating modules with fixed speed machines and single shaft ternary machines shall be considered as synchronous power generating modules.</p> <p>b) Pump-storage power-generating modules with variable speed machines shall be considered as power park modules. For doubly-fed induction machines, the parameters of Table 3.1 or Table 7.1 shall apply to define the voltage-against-time profile with regard to fault-ride-through</p>	<p>Note at point 2:</p> <p>In RfG Version 2016 an obligation for synchronous compensation mode is introduced only for Pump Storage Hydro technology, not for any other rotating technology e.g. DFIM Wind Farms or conventional</p>	

## Article 6

capability.

c) The requirements of this regulation (with respect to the exceptions in this article), that apply to pump-storage power-generating modules in pumping mode and concern active power, shall apply in a way that the same effect as to behaviour of active power generation is achieved by the behaviour of active power consumption. For the avoidance of doubt, this provision does not impose FSM according to Art. 15.2 in the pumping mode.

d) In pumping mode no technical capability to remain connected and continue operation is requested for frequencies below 49 Hz, unless a higher value of this threshold is defined by the relevant TSO.

e) To pump-storage power-generating modules with fixed speed machines in pumping operation mode, Articles 13(2), 13(3), 13(4), 13(5), 13(7), 14(2), 15(2), 15(5) and 15(6) (e) shall not apply. In pumping operation mode, the second sentence of Article 17(3) shall not apply;.

f) To pump-storage power-generating modules with single shaft ternary machines in pumping operation mode, Articles 13(4), 13

power plants.

Since synchronous compensation mode, is also a special operation for Pump Storage Power Plants additional investments e.g. for blade cooling, have to be done, even if the mode is not used by the relevant system operator.

A new article for synchronous condenser is necessary  
vgbe proposes to erase this requirement.

Vgbe supposes that the voltage criterion in the classification will be erased. If not, a provision has to be added if a HV grid is available and a MV grid is not available to connect small PGMs.

The conclusions about physical limitations have to be respected in the new version of RfG.  
Since all technologies make use of the energy of moving water representing a large inertia, the speed of change of active power is limited, even if connected by a full converter. Therefore the technically imposed ramping rates of each technology should be respected.

COMMENT AT POINT C

	<p>(5) and 15(5) shall not apply. In addition, Articles 13(2), 13(3), 13(7), 14(2), 15(2), 15(6)(e) and the second sentence of Article 17(3) shall not apply, if only pumps are operated. Where Articles 13(2) or 15(2) are applicable, the reference active power for LFSM-O or LFSM-U respectively is the maximum capacity of the turbine.</p> <p>g) To pump-storage power-generating modules with variable speed machines in pumping operation mode, Articles 13(4), 13(5) and 15(5) shall not apply.</p> <p>POINT 4.c</p> <p>(c) the power-generating modules are of type A, B, C and D in accordance with points (a) to (c) of Article 5(2).</p>	<p>Applying FSM in pumping mode is only possible when agreed with the operator.</p> <p>COMMENT AT POINT 4.c : No argument exists to exclude type D</p>	
	<p>TO ADD AT POINT 3</p> <p>(h) accept that nuclear safety requirements prevail over the requirements of this code</p> <p>(i) allow the PGM to disconnect if the requirements of this code are not respected by the RSO .</p> <p>NEW POINT 9.</p> <p>9. When one or more HVDC</p>		

Article 7	<p>converter stations are within close electrical proximity of a new to build installation submitted to this Regulation (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 converter station to ensure compliance with the requirements of the European Regulation as if it is a new converter 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 installations connected to TSOs in the neighbourhood.</p> <p>FORMER POINT 9 BECOMES POINT 10</p>	<p>COMMENT AT POINT 3.h All stakeholder consider this as a rational statement. So no argument exists to refuse this insertion.</p> <p>COMMENT AT POINT 3.i Each PGM has the right to protect its installation at abnormal grid characteristics. As example: a steady state overvoltage during several hours.</p> <p>COMMENT AT POINT 9 The HVDC NC takes care of studies only in case of new installed HVDC terminal in an existing grid with other grid users in the close electrical proximity. The opposite situation is not described in the codes. In the future, new grid users can have the intention to make a connection in the close electrical proximity of HVDC terminal. In that case, new studies must be completed. This may have an impact on the necessity of availability of models of HVDC for other parties.</p> <p>A similar provision has to be inserted in the DCC</p>	
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			

Please upload figures or tables if necessary

The maximum file size is 1 MB

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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
	<p>b) With regard to the rate of change of frequency withstand capability, a power-generating module shall be capable of staying connected to the network and operate at rates of change of frequency as specified below unless disconnection was triggered by rate-of-change-of-frequency-type loss of mains protection. The relevant system operator, in coordination with the relevant TSO, shall specify this rate-of-change-of-frequency-type loss of mains protection.</p> <p>PGMs must withstand a RoCoF (Rate of Change of Frequency) of 1.0 Hz/sec measured with a 500 ms sliding window. If a PGM can withstand a higher value of the RoCoF by its inherent technology,</p>		



<p>Article 13(1)</p>	<p>it shall communicate this value to the RSO or relevant TSO. A frequency profile shall be proposed by all TSOs of each synchronous area so that PGMs can simulate and confirm that they are able to withstand this profile.</p> <p>NEW TITLE FOR TABLE 2 Minimum time periods for which a power-generating module has to be capable of injecting active power on different frequencies, deviating from a nominal value, without disconnecting from the network.</p> <p>IN EACH LINE "49.0 Hz- 51.0 Hz" Unlimited respecting SOGL provisions</p>	<p>See results of both workshops regarding the RoCoF and the vgbe presentation at the GC ESCon 21/9 /2022</p> <p>COMMENT AT TITLE TABLE 2 This table does not apply for pumped hydro and for storage devices in pumping / charging mode.</p> <p>COMMENT AT "Unlimited respecting SOGL provisions" An unlimited time period for operation with a frequency deviation exceeding its maximum steady state value (*) means that the time period for operation shall be at least ten times longer than the "time to restore frequency" (*) (* as defined by Commission Regulation (EU) 2017/1485 Annex III)</p> <p>The idea here is to underline that a 49 Hz frequency during an unlimited time is impossible, and that therefore such a frequency should only be borne during a limited time (necessary for grid restoration for instance)</p>	
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Article 13(2)	<p>NEW LINES IN POINT (e):</p> <p>Priority of LFSM-O over external control signals has to be agreed with the RSO.</p> <p>The response time for power decrease shall respect the physical limits of the primary energy process .</p>	<p>Priority of LFSM-O over external control signals has to be agreed with the RSO. Units providing FRR and RR services have to continuously process external set points, otherwise the system freezes and cannot be controlled anymore</p> <p>The response time for power decrease shall respect the physical limits of the primary energy process. See a similar provision in Art.15.6. e specifying "the relevant system operator shall specify, in coordination with the relevant TSO, minimum and maximum limits on rates of change of active power output (ramping limits) in both an up and down direction of change of active power output for a power-generating module, taking into consideration the specific characteristics of prime mover technology;"</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
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New provisions	<p>8. Additional requirements for PPMs with a grid following inverter and grid forming inverter regarding FRT, control of injected active and reactive power</p> <p>9. Storage devices able to operate in charging mode and in generating mode shall be able to .... Storage devices in charging must be able to stop charging at a frequency in the range 49.8 Hz - 50 Hz as defined commonly by all TSO of each synchronous area. Also batteries installed in electric vehicles shall follow those requirements if they are able to inject power into the grid.</p> <p>10. Additional requirements for PPMs with a grid forming inverter if appropriate for installations classified as type A.</p> <p>11. Regarding weather or climate-change related hazards, each Member State shall specify ranges in which a PGM is designed to operate for following items:</p> <ul style="list-style-type: none"> <li>• The ambient temperature</li> <li>• The cooling water temperature</li> <li>• Earthquake resistance</li> </ul>	<p>AT POINT 8 vgbe accepts the final report of the Expert Group BftA, but it considers itself as not the most ideal stakeholder to write the requirements in a legal form.</p> <p>Take care of the location to impose the requirements : or at the terminals (PGU approach) or at the connection point (PGM approach)</p> <p>AT POINT 9 vgbe accepts the final report of the Expert Group Storage, but it considers itself as not the most ideal stakeholder to write the requirements in a legal form.</p> <p>AT POINT 10 See results of the expert group ACPPM</p> <p>AT POINT 11 As proposed by ACER, but adding also earthquake hazards. vgbe believes that the Member State and not the TSO has the qualifications to impose those temperature conditions.</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)	<p>TO ADD:</p> <p>(viii) Synchronous power generating modules having low inertia due to special type of construction may be connected in agreement with the relevant TSO. A study to determine the limits of FRT capability in terms of maximum fault clearance time or minimum fault voltage level should be carried out by the owner of the power generating module.</p>	<p>The report of the EG Pump Storage Hydro includes additional findings about low inertia run of river bulb turbines , which have only limited FRT capability. Nevertheless to further support the development of renewable energy sources, this kind of turbines should not be forbidden by the future RfG. Beside having only limited FRT capability, such turbines still introduce additional natural inertia and short circuit power to a grid having a high share of RES. Typically these run of river power plants are in operation all the time, day and night.</p>	
Article 14(4)			

Article 14(5)	<p>TO ERASE IN 5.(b) (i) :</p> <p>The protection schemes and settings for internal electrical faults must not jeopardise the performance of a power-generating module, in line with the requirements set out in this Regulation</p> <p>THE CORRECT WORDING IN 5. (b) (iii):</p> <p>"reverse power" FOR INVERSE POWER</p>	<p>Nonsense, it is the duty of an operator of a power plant to trip if a protection orders a trip. What is meant by "performance of a PGM"? This provision applies at INTERNAL faults</p>	
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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)	<p>IN POINT C TO ADD</p> <p>Priority of LFSM-U over external control signals has to be agreed with the RSO.</p> <p>The response time for power increase shall respect the physical limits of the primary energy process .</p>	<p>Priority of LFSM-U over external control signals has to be agreed with the RSO. Units providing FRR and RR services have to continuously process external set points, otherwise the system freezes and cannot be controlled anymore</p> <p>The response time for power increase shall respect the physical limits of the primary energy process. See a similar provision in Art.15.6. e specifying "the relevant system operator shall specify, in coordination with the relevant TSO, minimum and maximum limits on rates of change of active power output (ramping limits) in both an up and down direction of change of active power output for a power-generating module, taking into consideration the specific characteristics of prime mover technology;"</p> <p>REGARDING FIG. 5 A figure with a deadband would be nice for readers not familiar with this topic</p>	
Article 15(3)			
Article 15(4)			

Article 15(5)	<p>THIS SENTENCE IN POINT a) (vi) IS USELESS</p> <p>"be capable of operating in LFSM-O and LFSM-U, as specified in point (c) of paragraph 2 and Article 13(2),"</p>	<p>useless sentence, this is imposed above and by Art. 13</p>	
	<p>TO INSERT IN POINT (c)</p> <p>(i) ..... The simulation model requirements and data provided shall not violate manufactures intellectual property;</p> <p>(ii) the Synchronous PGM simulation models provided by the power-generating facility owner shall contain the following sub-models, depending on the existence of the individual components:</p> <ul style="list-style-type: none"> <li>— alternator and prime mover,</li> <li>— speed and power control,</li> <li>— voltage control, including, if applicable, power system stabiliser ('PSS') function and excitation control system,</li> <li>— power-generating module protection models, as agreed between the relevant system operator and the power-generating facility owner.</li> </ul> <p>DELETE LAST POINT OF ENUMERATION</p>		

ADD (iii), (iv) and (v)

(iii) For the purpose of electromechanical dynamic simulations (RMS simulation studies) of power park modules, the relevant system operator or the relevant TSO shall have the right to specify the power park modules simulation model requirements. Without prejudice to the Member State's rights to introduce additional requirements, the simulation models of the power park modules provided by the power generation facility owner shall:

- a) be valid for the specified operating range and all control modes of the power-generating facility;
- b) include a proper representation of the converter modules and its control systems (including the synchronization module) that influence the dynamic behaviour of the power-generating module in the specified time frame;
- c) be open source generic model for cross border network stability studies;
- d) in the case that encrypted

detailed RMS models are accepted by the relevant TSO, the relevant TSO shall specify the requirements of the model encryption according to national regulations (for example use of source code, the model structure and the signal interfaces to be observable in the network studies);  
e) include the relevant protection function models;

(iv) For the purpose of time domain electromagnetic transient (EMT) simulations of power park modules, the relevant system operator or the relevant TSO shall have the right to specify the power park module model requirements. Without prejudice to the Member State's rights to introduce additional requirements, the models shall contain the following:  
a) be valid in the frequency range 0.2 Hz – 2500 Hz for relevant interaction studies. The validity of the PPM model shall be ensured for the given

Article 15(6)

frequency range at the connection point;  
b) be valid for specified operating range and control modes of the PPM in both the positive and in the negative phase sequence;  
c) reproduce the detailed response of the power-generating module and its control blocks during balanced and unbalanced AC network faults in the valid frequency range;  
d) include the power plant level control and the power plant relevant functionalities if applicable;  
e) include the frequency dependence of the lines and/or cables in the power-generating facility;  
f) represent the Power Plant Module transformers model including saturation, resistors, filter, breaker and AC arrester in the valid frequency;  
g) include all the relevant protection function models for the relevant interaction studies;  
h) be capable to be used for the numerical calculation of the

See final report of the ISSM expert group page 61 - 64

frequency  
dependent impedance of PPM at  
the connection point (impedance  
amplitude and impedance phase  
angle ) in the frequency range that  
the  
model is valid);

i) In the case that encrypted  
detailed EMT models are accepted  
by the  
relevant system operator or the  
relevant TSO, the relevant system  
operator or the relevant TSO shall  
have the right to specify the model  
encryption based on national  
regulations (for example the model  
structure and the signal interfaces  
to be observable in the network  
studies);

(v) For the purpose of frequency  
domain simulations for the risk  
assessment of  
the resonance stability of the  
power park module, the relevant  
system operator  
or the relevant TSO shall have the  
right to request from the power-  
generating  
facility owner the frequency  
dependent impedance model of  
the powergenerating facility at the  
point of interconnection to the grid.  
Without prejudice to the Member



State's rights to introduce additional requirements, the following requirements shall apply:

- a) The impedance model of the power-generating facility shall be requested at least in the range 5.0 Hz - 2500Hz; As an additional requirement, the relevant system operator or the relevant TSO can extend the required applicability of the model to up to 9 000 Hz.
- b) The relevant system operator or the relevant TSO shall have the right to request the calculation of the impedance model of the power-generating facility either numerically (using the EMT model) or analytically (using transfer function);
- c) The relevant system operator or the relevant TSO shall have the right to request the impedance profile of the power-generating facility at the connection point through the whole operating range and control modes of operation;
- d) The impedance model of the power-generating facility shall be provided for both the positive and for the

	<p>negative phase sequence;</p> <p>e) The power-generating facility owner shall take into account the influence of the power-generating module control and measurement system as other parts of the power-generating module which influences the output impedance in the specified frequency range;</p> <p>f) The power-generating facility owner shall specify and justify simplifications made in the calculation of the impedance model.</p> <p>NEW POINTS OF ENUMERATION</p> <p>(vi) the request .....</p> <p>(vii) the power-generating facility owner .....</p>		
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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)	<p>TO ADD AT THE END OF (a) (i) .... in Tables 6.1 and 6.2, respecting the European standards</p> <p>TO ADD AT THE END OF (a) (ii) ...; those specified shorter periods of time will be based on European standards</p> <p>TO ADD IN THE HEADERS OF TABLES 6.1 AND 6.2: Respecting the EN standards</p>	<p>COMMENT AT (ii) It is useless to repeat the work done in the international standardisation commissions</p>	

Article 16(3)	<p>TO ADD</p> <p>(c) Synchronous power generating modules having low inertia due to special type of construction may be connected in agreement with the relevant TSO. A simulation to determine the limits of FRT capability in terms of maximum fault clearance time or minimum fault voltage level should be carried out by the owner of the power generating module.</p> <p>NEW POINTS OF ENUMERATION</p> <p>(d) fault-ride...</p>	<p>The report of the EG Pump Storage Hydro includes additional findings about low inertia run of river bulb turbines , which have only limited FRT capability. Nevertheless to further support the development of renewable energy sources, this kind of turbines should not be forbidden by the future RfG. Beside having only limited FRT capability, such turbines still introduce additional natural inertia and short circuit power to a grid having a high share of RES. Typically these run of river power plants are in operation all the time, day and night. E.g. 1350 MW installed capacity of bulb turbines at Austrian section of Danube river.</p>	
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)	(a) with regard to reactive power capability, the relevant system operator shall have the right to specify the capability of a synchronous power-generating module to provide reactive power taken into account Art.1;	If the RSO imposes the ability to supply reactive power, he has to use this ability also.	
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)	<p>(a) with regard to reactive power capability, the relevant system ...</p> <p>TO ADD IN (b) (i) without prejudice to the partially wider voltage ranges of Article 16 (2) point (a) the relevant system operator in coordination with the relevant TSO shall specify the reactive power provision capability requirements in the context of varying voltage. ...</p> <p>SEE REVISED FIG.7</p>	<p>This paragraph (a) applies only for power plants, not for Mixed Customer Sites. vgbe proposes to define the requirements at the terminals of the unit. The characteristics at the connection point have to be calculated by the owner of the PGM.</p> <p>REGARDING (b) (i) Some TSOs consider this as a fault in the code. Both articles stand independant in their own field of application</p> <p>The proposed diagram is more realistic than the old one. vgbe proposes this diagram to create a more harmonised European playing field. Consequently, table 8 has to become modified too.</p>	

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)	<p>(ii) the relevant system operator in coordination with the relevant TSO shall specify:</p> <p>...</p> <p>— the characteristics of the fast fault current, including the time domain for measuring the voltage deviation and fast fault current, for which current and voltage may be measured differently from the method specified in Article 2 ,</p> <p>...</p>	<p>Is this correct? Art. 2 contains definitions.</p>	
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)	<p>(a) with regard to reactive power capability, ...</p> <p>Fig 8 and Table 9 have to be redefined.</p>	<p>This paragraph applies only for power plants, not for Mixed Customer Sites. vgbe proposes to define the requirements at the terminals of the unit</p> <p>COMMENT REGARDING FIG 8 AND TABLE 9</p> <p>Also this diagram has to be modified to create a European level playing field. But other associations have to formulate a proposal.</p>	

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	<p>The frequency stability requirements laid down respectively in Article 13(1) to (5), except for Article 13(2)(b). shall apply to any AC-connected offshore power park module.</p> <p>Article 15(2) and Article 21(2) shall apply to AC-connected offshore power park modules type C.</p>	<p>The old wording is not correct. Art. 15 and Art. 21 do not apply to all PPMs</p>	

Article 25	<p>TO ADD AT 1.</p> <p>.... and for the time periods specified in Table 10 if the voltage at the connection point is 110 kV or more. This threshold can be increased by the TSO if transformers are installed at an offshore connection point. The transformers will provide an earthed neutral for the network at which the offshore power park modules are connected.</p> <p>THE TWO HEADINGS OF TABLE 10 HAVE TO CONTAIN THE NOTION "Respecting the EN standards"</p> <p>The values in table 11 have to be modified to obtain conformity with the previous tables.</p>	<p>Wind turbines of 25 MW are in the future scope of this business imposing a voltage above 110 kV.</p> <p>It is logic that the owner of transformers sets the earthed neutral at the disposal of gridusers like it is generally accepted onshore</p> <p>COMMENT FOR TABLE 11 See above for synchronous PGMs</p>	
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	<p>TITLE XXX SYNCHRONOUS CONDENSERS</p> <p>The requirements for all Synchronous Condensers are specified in this network code. Some ideas:</p> <p>a) Is a classification of synchronous compensators desired, similar to the classification of PGMs? Should the classification based on inertia, maximum reactive power or other criteria?.</p> <p>b) Articles 13(2), 13(3), 13(4), 13(5), 13(7), 14(2), 15(2), 15(5) 15(6) (e) and 17(3) shall not apply.</p> <p>c) active power consumption to cover losses and auxiliary services.</p>	<p>vgbe proposes to make this the subject of a dedicated workshop and to define requirements based on the inertia.</p> <p>The size of inertia will impact the voltage at the connection point.</p>	

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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	TO ADD AT THE END OF POINT 7 After submission to the regulatory authority, the LON becomes valid until a decision of the regulatory authority.	Was not specified in the old code.	
Article 38			
Article 39	TO ERASE IN POINT 2. (c) (iv) and (v) (iv) congestion management; (v) defence measures ;	Those terms are not defined and should consequently be erased	

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	<p>POINT 2.(c)</p> <p>(i)...</p> <p>(ii) undamped oscillations do not occur after the step change response at grid conditions described in a standardised connection agreement.</p>	<p>The undamped oscillations depend also on the grid configuration</p> <p>To add : at standard grid conditions as defined in standardised connection agreements</p>	
Article 45	<p>POINT 2. (b)</p> <p>the test shall be carried out by creating appropriate active power load points, with low frequency steps and ramps</p> <p>POINT 7. (b) (i)</p> <p>the power-generating module operates at maximum reactive power during maximum one hour , at an operating point defined by the operator and the RSO.</p> <p>Additional test, each during 15 minutes, can be imposed by the TSO at following operational conditions</p> <p>- ....</p>	<p>A test is not a simulation.</p> <p>Rephrase this sentence.</p> <p>COMMENT AT 7.b.(i)</p> <p>A single test during one hour proves the thermal capabilities of the PGM. It is useless to repeat this thermal test several times.</p>	

Article 46			
Article 47			
Article 48			
Article 49			
Article 50	The compliance tests established in Article 44(2), as well as in paragraphs 2, 3, 4, 5, 6, 7, 8 and 9 of Article 48 shall apply to offshore power park modules.	What about paragraph 6? Forgotten?	
Article 51			
	<p>POINT 2. (a) the power-generating module's capability to modulate active power at low frequencies in accordance with point (c) of Article 15(2) shall be demonstrated by RMS simulation;</p> <p>POINT 3. (a) the power-generating module's capability to modulate active power over the full frequency range in accordance with point (d) of Article 15(2) shall be demonstrated by RMS simulation</p> <p>POINT 4. (a) the power-generating module's performance during island operation referred to in the conditions set out in point (b) of Article 15(5) shall be demonstrated</p>		

Article 52	<p>by RMS simulation;</p> <p>POINT 5. (a) the power-generating module's capability to provide leading and lagging reactive power capability in accordance with the conditions set out in points (b) and (c) of Article 18 (2) shall be demonstrated by simulation in the outer corners of the U-Q/Pmax diagram. In addition, two simulations of the executed tests shall be performed with the real grid voltage and load points during the tests;</p> <p>POINT 5.(b) (i) the simulation model of the power-generating module is validated against the compliance tests for reactive power capability as far as these tests were accommodated (grid voltage deviations) and allowed by the RSO described in Article 45(7); and</p>	<p>As proposed by the expert group ISSM.</p> <p>This comment applies several times in this Art.</p>	
Article 53			
Article 54			
Article 55			
Article 56			

Article 57			
Article 58			
Article 59	1. As instructed by ACER, ENTSO for Electricity shall monitor...	vgbe accepts that ENTSOE has to monitor the implementation but the monitoring should be executed according to instructions from ACER.	

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	<p>POINT 11</p> <p>A regulatory authority may revoke a decision granting a derogation if the circumstances and underlying reasons no longer apply or upon a reasoned recommendation of the Commission or reasoned recommendation by the Agency pursuant to Article 65(2).</p>	<p>What will happen if this occurs. Should the PGM be stopped and disconnected from the grid until the problem is solved, does it have x months to solve it etc???</p> <p>In case of revoke, will the owner of the PGM be compensated for costs that were made based on the derogation?</p>	
Article 63	<p>POINT 11</p> <p>A regulatory authority may revoke a decision granting a derogation</p>	<p>What will happen if this occurs. Should the PGM be stopped and disconnected from the grid until the problem is solved, does it have x months to solve it etc???</p> <p>In case of revoke, will the owner of the PGM be compensated for costs that were made based on the derogation?</p>	



Article 64	<p>POINT 1</p> <p>Regulatory authorities shall maintain a register of all derogations they have granted or refused and shall provide the Agency with an updated and consolidated register at least once every six months. This register will be publicly available</p>	<p>All derogations shall be publicly available in the mindset of openness of governmental decisions.</p>	
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	TO ERASE ART. 66 TO 70	Can be erased. Emerging technologies do not exist anymore	
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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