Contribution ID: 0ed26b68-67d2-4036-a83d-9a0812b0f3d5
Date: 10/06/2022 09:47:21

# ACER Public Consultation on the Policy Paper on the revision of NC RfG and NC DC

Fields marked with * are mandatory.

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 process, as presented to the GC ESC is outlined in the Figure below:


**Please note** that this public consultation belongs to the **first** phase of the process (scoping phase) that will be followed by the call for stakeholders to submit their proposals in September 2022 during the 8-week long consultations.

For the avoidance of doubt, the Commission Regulation (EU) 2016/1447 of 26 August 2016 establishing a network code on requirements for grid connection of high voltage direct current systems and direct current-connected power park modules (NC HVDC) is out of the scope of this consultation as the work on its amendment is expected to start in 2023.

The purpose of this consultation is to gather views, feedback and input from all stakeholders on the Policy Paper (link) drafted within the scoping framework of the process. This consultation is addressed to all interested stakeholders. Consulted Policy Paper, planned to be published by September 2022, aims to transparently indicate to stakeholders the areas in which amendments are to be expected, as regards:

- Commission Regulation (EU) 2016/631 of 14 April 2016 establishing a network code on requirements for grid connection of generators (NC RfG) - link
- Commission Regulation (EU) 2016/1388 of 17 August 2016 establishing a Network Code on Demand Connection (NC DC) - link

**Replies to this consultation should be submitted by 10 June 2022 23:59 CET.**

ACER is highly committed in processing personal data in a lawful way.
Find out more how we process your data: https://www.acer.europa.eu/the-agency/about-acer/data-protection

---

* 2 Name of the stakeholder:

Energie-Nederland

* 3 Contact person:

Paul Giesbertz

* 4 Contact person's email address:

pgiesbertz@energie-nederland.nl

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

Netherlands

* 7 Type of the stakeholder:

Note: Please, choose the type of organisation that is the most accurate description of the stakeholder

- (●) Generator (including association)
- ( ) Consumer (including association)
- ( ) Transmission system operator (including association)
- ( ) Distribution system operator (including association)
- ( ) Academia/research institution
- ( ) Other (please, elaborate)

8 Please, elaborate on your answer above, if necessary:

Association of energy industry (generation, supply, aggregation, trade)

* 9 What is the impact of the NC RfG or NC DC legal requirements on your organisation?

- [ ] Direct impact (provisions are applicable to my organisation)
- [ ] Possible direct impact (e.g., applicability in the foreseeable future)
- [ ] Indirect impact (e.g., provisions apply to my contractors)
- [ ] No relevant impact
- [ ] I do not want to specify the impact
- [x] Other (please, elaborate)

10 Please, elaborate on your answer above, if necessary:

Direct impact to our members

* 11 Do you consent to the publication of the stakeholder's name?

- (•) Yes
- ( ) No

* 12 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 adoption process of the consulted Policy Paper)

---

14 Knowing that the exact proposals for amendments will be sought during the public consultation starting in September, please, provide your general comments or views on this Policy Paper, if any:

* 15 Is there any area that you consider important but has not been covered by this Policy Paper?

- (•) Yes
- ( ) No
- ( ) Other

16 Please, elaborate on your answer above, if necessary:

Overlap with existing codes should be addressed. The Connection Codes should focus on connection requirements only. It should not cover operational or market aspects as such aspects should be covered in the System Operation and Market Codes. Therefore the whole Title III of the Demand Connection Code (articles 27-33) should be reconsidered or even removed. Also article 15.6 e) of the RfG should be removed or at least reconsidered. TSOs should not determine min or max ramp rates and certainly not in a connection code.

* 17 To what extent do you agree with the policy analysis and recommendations on the **requirements for pump-storage hydro PGMs**:

- ( ) 5 (strongly agree)
- ( ) 4 (agree)
- (•) 3 (neutral)

- 2 (disagree)
- 1 (strongly disagree)

18 Please, elaborate on your answer above, if necessary:

* 19 To what extent do you agree with the policy analysis and recommendations on the **determination of significance of PGMs**:

- 5 (strongly agree)
- 4 (agree)
- 3 (neutral)
- 2 (disagree)
- 1 (strongly disagree)

20 Please, elaborate on your answer above, if necessary:

It seems a good idea to remove the >110 kV criterium. The voltage level of the connection has hardly any impact on the significance of a PGM. The maximum capacity of the PGM seems sufficiently decisive.

* 21 To what extent do you agree with the policy analysis and recommendations on the **technical requirements for mixed customer sites with generation, demand and storage**:

- 5 (strongly agree)
- 4 (agree)
- 3 (neutral)
- 2 (disagree)
- 1 (strongly disagree)

22 Please, elaborate on your answer above, if necessary:

Mixed customer sites are becoming more important. From a technical point of view there is no difference between a generator asset directly connected to the grid and a generator asset connected at a mixed customer site. The connection codes should reflect this and not result in differential treatment of different assets.

* 23 To what extent do you agree with the policy analysis and recommendations on the **requirements for type A PGMs**:

- 5 (strongly agree)
- 4 (agree)
- 3 (neutral)
- 2 (disagree)
- 1 (strongly disagree)

24 Please, elaborate on your answer above, if necessary:

* 25 To what extent do you agree with the policy analysis and recommendations on the **significant modernisation**:

- 5 (strongly agree)
- 4 (agree)
- (•) 3 (neutral)
- 2 (disagree)
- 1 (strongly disagree)

26 Please, elaborate on your answer above, if necessary:

Any revision of the connection codes should not result in additional requirements for existing assets.

* 27 To what extent do you agree with the policy analysis and recommendations on the **technical requirements for storage**:

- 5 (strongly agree)
- 4 (agree)
- (•) 3 (neutral)
- 2 (disagree)
- 1 (strongly disagree)

28 Please, elaborate on your answer above, if necessary:

One should consider to develop just one connection code, covering connection requirements for all connected assets (generators, demand, storage, conversion). This could help to ensure consistent requirements and provision of a level-playing field for all connected grid users on the market.

* 29 To what extent do you agree with the policy analysis and recommendations on the **electromobility**:

- 5 (strongly agree)
- 4 (agree)
- (•) 3 (neutral)
- 2 (disagree)
- 1 (strongly disagree)

30 Please, elaborate on your answer above, if necessary:

* 31 To what extent do you agree with the policy analysis and recommendations on the **simulation models and compliance monitoring**:

- 5 (strongly agree)
- 4 (agree)
- (•) 3 (neutral)
- 2 (disagree)
- 1 (strongly disagree)

32 Please, elaborate on your answer above, if necessary:

* 33 To what extent do you agree with the policy analysis and recommendations on the **advanced capabilities for grids with high penetration of DER**:

- 5 (strongly agree)
- 4 (agree)
- 3 (neutral)
- (•) 2 (disagree)
- 1 (strongly disagree)

34 Please, elaborate on your answer above, if necessary:

This seems to be related to the operation of a grid or system. It thus needs to be addressed in other codes, like the SO code.

* 35 To what extent do you agree with the policy analysis and recommendations on the **requirements for weather hazards resilience of generators**:

- 5 (strongly agree)
- 4 (agree)
- 3 (neutral)
- (•) 2 (disagree)
- 1 (strongly disagree)

36 Please, elaborate on your answer above, if necessary:

It is questionable whether weather resilience of generators should be covered. It is primarily the responsibility of the generator itself to take care of the technical availability of its plant and thus also its capability to produce during extreme weather. Higher availability will result in higher revenues, which should provide the correct signal to invest in resilience or not.

* 37 To what extent do you agree with the policy analysis and recommendations on the **technical requirements for active customers/energy communities**:

- 5 (strongly agree)
- 4 (agree)
- 3 (neutral)
- (•) 2 (disagree)
- 1 (strongly disagree)

38 Please, elaborate on your answer above, if necessary:

There is no need to mention active customers, aggregators or local energy communities or any other market role in the connection codes. As the connection codes should only deal with connection requirements for assets. The extent to which a certain costumer is active on the market and through with arrangement, should not be relevant for connection requirements.

* 39 To what extent do you agree with the policy analysis and recommendations on the **requirements for units providing demand response services**:

- 5 (strongly agree)
- 4 (agree)
- 3 (neutral)
- (•) 2 (disagree)
- 1 (strongly disagree)

40 Please, elaborate on your answer above, if necessary:

> The connection codes should cover technical connection requirements and such requirements should not be dependent on whether a certain asset is providing services to the market or to a TSO/DSO. Requirements related to the provision of services should be covered in other (system and market) codes.

## Contact

Contact Form