To the kind attention of **Christian Zinglersen**
Director, ACER
cc: Ditte Juul Jørgensen, Director General DG ENER, European Commission

Brussels, 12 December 2022

Dear ACER Director, Dear Christian,

RE: Expansion of the scope of the Grid Connection Network Codes to consider Decentralised Energy Resources

The European energy system is going through an unprecedented crisis resulting in extremely high energy prices. One answer is to connect faster renewable energy to the European networks taking advantage of the significant growth of Distributed Energy resources (DERs) in consumer environments. Through their flexible capabilities, DERs like demand management, small scale renewables and energy storage facilities can help manage price hikes while allowing more renewable penetration, ensuring security of supply and system stability. On behalf of smartEn, I would like to stress the opportunity offered by the current revision of the Grid Connection network codes (both the Requirements for Generators (RfG) and the Demand Connection (DC) codes) to fully consider and facilitate the role that DERs can play in the energy system.

The current focus of the Grid Connection network codes is not fit for this purpose:

- They are built around the legacy understanding of large demand assets connected to the transmission grid,
- They do not take into account the specificities and new capabilities of smart inverters,
- The interpretation of demand assets in the DC code does not include new demand-side resources like electric vehicles,
- The categorisation of small power generator modules (PGMs) and the technical requirements for mixed customers sites (MCSs) do not reflect the specificities of DERs.

Given the far-reaching effect that network codes have in practice, far beyond the cross-border scope originally intended, smartEn encourages ACER[1] to:

- Expand the scope of application of the connection codes at the grid-tie point as the relevant reference rather than on the individual asset, e.g., connection points of homes and small buildings. This will for instance allow the expansion of distributed rooftop PV installation leaving more freedom to consumers to complement such installation with flexible assets behind the meter and propose smart alternatives when grids are technically constrained,
- Enable those DERs that are compliant with the connection codes to provide their flexibility even if not all DERs behind the grid-tie point are compliant with the codes' requirements,
- Include in the scope of the network codes new technologies like electric vehicles, charging stations and emergency power batteries and allow a faster approval of such installation through approved type-test approach for homologation,
- Harmonize remote power control data interfaces using international standards such as IEC 61850-7-420.

This will ensure growing grid technical bottlenecks will not affect the deployment and flexible activation of DERs moving forward in a consistent way with the European Green Deal, the REPowerEU package, the Electricity Market Design and the overall objective of increasing clean electrification of end-use sectors.

On behalf of smartEn, I would like to ask for a meeting to discuss the broadening of the scope of the RfG and DC network codes to integrate DERs fully and effectively in the energy system.

Yours sincerely,

Michael Villa

Executive Director, smartEn

[1] A thorough reply to the public consultation was submitted by smartEn

About smartEn - Smart Energy Europe

smartEn is the European business association integrating the consumer-driven solutions of the clean energy transition. We create opportunities for every company, building and car to support an increasingly renewable energy system. Our membership consists of the following companies:

The positions expressed in this document represent the views of smartEn as an association, but not necessarily the opinion of each specific smartEn member.
For further information about smartEn, please visit www.smarten.eu

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