

Annex to EUGINE's reply to Public Consultation on Revision of the Network Code on Requirements for Grid Connection of Generators

EUGINE Amendments Recommendation, August 2026

Art.2 (NEW definition)	
Text proposed by the Commission	Amendment recommendation
	'connect to the network' means the first energisation of a power-generating module at its connection point. For Type D power-generating modules, this shall correspond to the date of the energisation operational notification issued pursuant to Article 41.
Justification <i>The term "connect to the network" is used as the trigger for the application of the transitional provisions but is not defined. A definition is needed to ensure legal certainty, particularly for Type D projects where auxiliary systems may be energised before the relevant deadline.</i>	

Art.4.2 and 4.3	
Text proposed by the Commission	Amendment recommendation
1. The regulatory authority shall establish the definition of significant modernisation... and conduct a public consultation in accordance with Article 10. 2. The definition of significant modernisation shall set parameters in accordance with all the following criteria: (a) an increase above the existing maximum capacity of the power-generating module... increase in the range of 5 - 20%; (b) an increase from the reactive power capability of the power-generating module... increase in the range of 10 - 20%; (c) a change in frequency stability and active power management capabilities of the power-generating module, [...]; (d) for Type C and D, a change of components of a power-generating module except for changes resulting from maintenance. In the proposal referred to in paragraph 1, the TSO may propose additional criteria for the purpose of defining a significant	1. The regulatory authority shall establish the definition of significant modernisation... and conduct a public consultation in accordance with Article 10. 2. The definition of significant modernisation shall imply that power generating module has been modified such an extent that its electrical characteristic and grid-dynamic interaction have materially altered and shall set parameters in accordance with all the following criteria: (a) an increase above the existing maximum capacity of the power-generating module... increase in the range of 5 - 20%; (b) an increase from the reactive power capability of the power-generating module... increase in the range of 10 - 20%; (c) a change in frequency stability and active power management capabilities of the power-generating module, [...]; (d) for Type C and D, a change of components of a power-generating module except for changes resulting from maintenance. In the

modernisation with regard to site-specific requirements only. 3. The requirements of this Regulation shall apply to the entire power-generating module and not only to the modernised part of the power-generating module.	proposal referred to in paragraph 1, the TSO may propose additional criteria for the purpose of defining a significant modernisation with regard to site-specific requirements only. (e) notwithstanding point (d), the replacement, upgrade or modification of components for the purpose of improving the efficiency of the power-generating module or reducing its emissions shall not, in itself, constitute significant modernisation, provided that the criteria set out in points (a) and (b) are not met. 3. The requirements of this Regulation shall apply to the entire power-generating module and not only to the modernised part of the power-generating module or power generating unit and correspondent capabilities, unless differently stated at national level.
Justification <i>The definition of significant modernisation should not discourage upgrades that improve efficiency, reduce emissions or support decarbonisation, where these do not materially alter the electrical characteristics or grid-dynamic behaviour of the power-generating module.</i> <i>A component replacement or upgrade should not automatically trigger full re-compliance of the entire module. The proposed clarification would ensure proportionality while preserving the objective of the provision.</i>	

Art.14.1(b)	
Text proposed by the Commission	Amendment recommendation
(b) with regard to the capability to withstand the rate-of-change-of-frequency: (i) a synchronous power-generating module shall be capable of remaining connected to the network and operating at rates-of-change-of-frequency up to the following values: (1) ± 2.0 Hz/s over a period of 0.5 seconds; (2) ± 1.5 Hz/s over a period of 1 second; (3) ± 1.25 Hz/s over a period of 2 seconds;	(b) with regard to the capability to withstand the rate-of-change-of-frequency: (ii) a synchronous power-generating module shall be capable of remaining connected to the network and operating at rates-of-change-of-frequency up to the following values independent performance criteria: (1) ± 2.0 Hz/s over a period of 0.5 seconds; (2) ± 1.5 Hz/s over a period of 1 second; (3) ± 1.25 Hz/s over a period of 2 seconds; These requirements are subordinate to the frequency range limitations in Article 14, Table 2. Where frequency deviates beyond Table 2 ranges, the module may disconnect in accordance with the specified time-frequency withstand durations, notwithstanding the above requirements.
Justification <i>The three rate-of-change-of-frequency thresholds should be clearly understood as independent performance criteria, not as cumulative or sequential requirements.</i> <i>The text should also clarify that these requirements remain subject to the frequency range limitations in Article 14, Table 2. This would avoid conflicting interpretations and support consistent implementation.</i>	

Art.15.5

Text proposed by the Commission	Amendment recommendation
5. When activating LFSM-O, the following response parameters shall apply: (a) the start of active power decrease (initial delay time T_{id} in Figure 4) by the power-generating module shall not be intentionally delayed; (b) the response time for active power decrease (T_{resp} in Figure 4) in the case of increasing frequency shall be as fast as technically feasible and shall not exceed: (i) for a synchronous power-generating module: 8 seconds for an active power setpoint change of 45% of maximum power; (ii) for a power park module: 2 seconds for an active power setpoint change of 50% of maximum power. [...] 10. The TSO shall specify the admissible active power reduction from maximum output with falling frequency expressed as a rate of reduction within the boundaries illustrated by the solid lines in Figure 5: (a) below 49 Hz at a rate of 2% of the maximum capacity at 50 Hz per 1 Hz frequency drop; (b) below 49.5 Hz at a rate of 10% of the maximum capacity at 50 Hz per 1 Hz frequency drop. The admissible active power reduction from maximum output shall account for the different ambient conditions and the technical capabilities of power-generating modules.	5. When activating LFSM-O, the following response parameters shall apply: (a) the start of active power decrease (initial delay time T_{id} in Figure 4) by the power-generating module shall not be intentionally delayed; (b) the response time for active power decrease (T_{resp} in Figure 4) in the case of increasing frequency shall be as fast as technically feasible and shall not exceed: (i) for a synchronous power-generating module not included in point (ii): 8 seconds for an active power setpoint change of 45% of maximum power (ii) For power generating plants with internal combustion engines or gas turbines, the following values apply to an active power change (increase or reduction) with a power gradient of – ≤ 2 MW, at least 66 % P_{max} per minute (equals 1,11 % P_b inst per second) – > 2 MW, at least 20 % P_{max} per minute (equals 0,33 % P_b inst per second). (iii) for a power park module: 2 seconds for an active power setpoint change of 50% of maximum power If the response time is greater than stated above, the power-generating facility owner shall justify the delay, providing technical evidence to the relevant TSO. [...]
Justification <i>For power-generating plants with internal combustion engines or gas turbines, active power response is limited by prime-mover characteristics, including combustion stability, thermal and mechanical constraints, emissions performance and safe operation.</i> <i>For these technologies, technology-specific power gradients provide a more appropriate compliance criterion than a uniform 8-second response time for a 45 percent active power change. The proposed values are based on the German Technical Connection Rules for Extra High-Voltage, which set uniform requirements for customer installations connected to the extra high-voltage network and implement the European Network Code Requirements for Generators at this voltage level in Germany.</i> <i>The proposed amendment ensures that LFSM-O requirements remain technically feasible while preserving the objective of supporting system stability.</i>	

Art.22.2, 22.4(b)(ii)	
Text proposed by the Commission	Amendment recommendation
2. The following requirements shall apply: [...] (b) with regard to limited frequency sensitive mode - underfrequency (LFSM-U): [...] (iv) the power-generating module shall be capable of providing a power increase up to its maximum capacity, limited as described in Art 15.10 and considering Art. 22.2(b)(ii)(3) and Art. 22.2(c)(ii)(2). (c) notwithstanding point (b), the following shall also apply in frequency sensitive mode: the power-generating module shall be capable of providing full active power frequency response as long as the frequency deviation persists, limited by the maximum energy content of the electricity storage module or primary energy source of the power-generating module;	2. The following requirements shall apply: [...] (b) with regard to limited frequency sensitive mode - underfrequency (LFSM-U): [...] (iv) the power-generating module shall be capable of providing a power increase up to its maximum capacity, limited as described in Art 15.10 and considering Art. 22.2(b)(ii)(3) and Art. 22.2(c)(ii)(2). (c) notwithstanding point (b), the following shall also apply in frequency sensitive mode: [...] (vi) the power-generating module shall be capable of providing full active power frequency response as long as the frequency deviation persists, limited by the maximum energy content of the electricity storage module or primary energy source of the power-generating module, limited by the maximum time allowed for the deviation. 4. The following requirements related to system restoration shall apply: [...] (b) with regard to the capability to take part in island operation: [...] (ii) operating stably during the transition from interconnected system operation to island operation without relying on information provided by the relevant system operator, as specified in paragraph 2, points (b) and (c), of this Article and Article 15;
Justification <i>On point 4 (b)(ii), island operation requirements should reflect the specific characteristics of different prime-mover technologies. Further clarification is needed for undetected island conditions, where no information from the relevant system operator is available. For combustion engine technologies, combustion stability should also be recognised as a technical limitation when regulating active power between houseload operation level and minimum operating level.</i>	

Art.22 - table 11

Text proposed by the Commission	Amendment recommendation
Maximum admissible full activation time $t_2 \rightarrow$ 30 seconds for the synchronous areas Continental Europe and Nordic. 5 seconds for the synchronous area Ireland and Northern Ireland	Maximum admissible full activation time $t_2 \rightarrow$ 30 seconds for the synchronous areas Continental Europe and Nordic. 5 10 seconds for the synchronous area Ireland and Northern Ireland OR Maximum admissible full activation time t_2 within the technical limitations of the prime mover, unless justified otherwise in accordance with Article 22(2), point (c)(v) $\rightarrow$ 30 seconds for the synchronous areas Continental Europe and Nordic. 5 seconds for the synchronous area Ireland and Northern Ireland.
Justification <i>The 5-second full activation time proposed for Ireland and Northern Ireland may not be technically feasible for several prime-mover technologies, given the required sustained ramp rates.</i> <i>The requirement should therefore take into account the technical limitations of the relevant prime mover, while preserving the objective of supporting frequency response.</i>	

Art. 27(2)(a)

Text proposed by the Commission	Amendment recommendation
2. Type D synchronous power-generating modules shall fulfil the following additional requirements in relation to voltage stability: (a) the TSO may specify the capacity above which a type D power-generating module shall be equipped with a power system stabiliser to attenuate power oscillations.	2. Type D synchronous power-generating modules shall fulfil the following additional requirements in relation to voltage stability: (a) the TSO may specify the capacity above which a type D power-generating module unit shall be equipped with a power system stabiliser to attenuate power oscillations.
Justification <i>Power system stabiliser requirements relate to the behaviour of the individual machine.</i> <i>Applying the capacity threshold at aggregated module or plant level could lead to disproportionate requirements for multi-unit plants. Applying it at power-generating unit level would better reflect the technical purpose of the provision.</i>	

Art. 39.3(b)	
Text proposed by the Commission	Amendment recommendation
3. The relevant system operator may require the following additional information in the PGMD: [...] (b) compliance test reports demonstrating steady-state and dynamic performance as required by the national compliance scheme, including use of actual measured values during testing;	3. The relevant system operator may require the following additional information in the PGMD: [...] (b) compliance test reports demonstrating steady state and dynamic performance as required by the national compliance scheme, including use of actual measured values during testing;
Justification <i>Some compliance tests can only be performed after installation, in the actual operating environment of the power-generating module.</i> <i>The Regulation should therefore clearly allow site testing as a valid route to demonstrate compliance, including where final certificates depend on tests carried out on site.</i>	

Art. 39(5)	
Text proposed by the Commission	Amendment recommendation
5. The regulatory authority may provide that the PGMD shall be issued by an authorised certifier.	5. The regulatory authority may provide that the PGMD shall be issued by an authorised certifier.
Justification <i>Mandatory involvement of an authorised certifier for each Power-Generating Module Document could add cost and delay without clear additional system-security benefits.</i> <i>Deleting this provision would keep the compliance process proportionate, while preserving the possibility to demonstrate conformity through appropriate technical evidence.</i>	

Art. 47(2)	
Text proposed by the Commission	Amendment recommendation
2. For Type A power-generating modules, V2G EV and associated V2G EVSE, the power generating facility owner shall use equipment certificates, issued in accordance with Regulation (EC) No 765/2008 for the purpose of demonstrating compliance with this Regulation.	2. For Type A power-generating modules, V2G EV and associated V2G EVSE, the power generating facility owner shall use equipment certificates, issued in accordance with Regulation (EC) No 765/2008 for the purpose of demonstrating compliance with this Regulation, or, where such equipment certificates are not available, an equivalent certificate or a manufacturer's declaration of conformity accepted pursuant to Article 61(6).
Justification <i>RfG 2.0 changes the certificate route for Type A modules from an optional route to a mandatory one. Where equipment certificates are not yet available, this would leave Type A modules without a workable compliance route and could prevent new connections. The amendment therefore creates a fallback mechanism, consistent with the proposed new Article 61(6), until the relevant certification framework becomes operational.</i>	

Art. 49 (2)

Text proposed by the Commission	Amendment recommendation
2. The TSO in coordination with DSOs shall use the common structure referred to in paragraph 1 to develop, and update as needed, a proposal for a national compliance scheme including a certification scheme. The TSO shall submit that proposal for approval by the regulatory authority by [the date of entry into force of this Regulation plus 18 months]. The approved compliance scheme shall be published by the regulatory authority.	2. The TSO in coordination with DSOs shall use the common structure referred to in paragraph 1 to develop, and update as needed, a proposal for a national compliance scheme including a certification scheme. The TSO shall submit that proposal for approval by the regulatory authority by [the date of entry into force of this Regulation plus 18 months]. The regulatory authority shall decide on the proposal within six months of receipt thereof. The approved compliance scheme shall be published by the regulatory authority.
Justification <i>The provision sets a deadline for submission of the compliance scheme, but not for its approval. Introducing a six-month decision deadline would ensure legal certainty and is consistent with the approval timeline already provided in Article 7(8).</i>	

Art. 52 (1)

Text proposed by the Commission	Amendment recommendation
1. Any equipment certificate shall be based on a certification scheme established within a national compliance scheme. The equipment certificates may include power-generating unit certificates and component certificates. The equipment certificates shall demonstrate the conformity with the relevant technical requirements under this Regulation. The certification shall, to the extent possible, be harmonised with or provide unambiguous references to established technical standards or conformity assessment schemes.	1. Any equipment certificate shall be based on a certification scheme established within a national compliance scheme. The equipment certificates may include power-generating unit certificates and component certificates. The equipment certificates shall demonstrate the conformity with the relevant technical requirements under this Regulation. The certification shall, to the extent possible, be harmonised with or provide unambiguous references to established technical standards or conformity assessment schemes. Until the certification scheme referred to in the first sentence has been established and equipment certificates issued under that scheme are available, equipment certificates issued under existing national certification frameworks and demonstrating compliance with equivalent technical requirements shall be accepted in accordance with Article 61(6).
Justification <i>Article 52(1) links equipment certificates to a certification scheme within the national compliance scheme, but that scheme may not yet be approved or operational when the new requirements start to apply. This amendment cross-refers to the proposed transitional recognition mechanism in Article 61(6), ensuring that existing national certificates can be accepted until the new certification framework is in place.</i>	

Art. 61.3 (b) and NEW art. 61.6

Text proposed by the Commission	Amendment recommendation
3. Until the end of the power-generating module's lifetime or until it is significantly modernised pursuant to Article 4 of this Regulation, Articles 3, 5, 6 and 13 to 28 of Regulation (EU) 2016/631 shall continue to apply to the following power-generating modules: (a) those which were falling within the scope of application of Regulation (EU) 2016/631; (b) those which connect to the network between [the date of entry into force of this Regulation] and [the date of entry into force of this Regulation plus 24 months].	3. Until the end of the power-generating module's lifetime or until it is significantly modernised pursuant to Article 4 of this Regulation, Articles 3, 5, 6 and 13 to 28 of Regulation (EU) 2016/631 shall continue to apply to the following power-generating modules: (a) those which were falling within the scope of application of Regulation (EU) 2016/631; (b) those which connect to the network between [the date of entry into force of this Regulation] and [the date of entry into force of this Regulation plus 24 months], or for which the power-generating facility owner has concluded a final and binding contract for the purchase of the main generating plant before [date of entry into force + 24 months]. NEW 6. Where, on [date of entry into force + 24 months], the national compliance scheme referred to in Article 49(2) has not yet been approved, or where equipment certificates under that scheme are not yet available, the following shall apply until such certificates become available: (a) equipment certificates issued under existing national frameworks and demonstrating compliance with equivalent requirements shall be accepted for the purposes of Articles 47 and 48; (b) for Type A power-generating modules, a manufacturer's declaration of conformity shall be accepted for the purposes of Articles 47(2) and 48(1).
Justification <i>This amendment mirrors the proposed grandfathering provision in Article 62 and ensures consistency between the transitional regime and the carve-out for projects already contractually committed before the cut-off date.</i> <i>The addition of a point 6, provides a transitional fallback where the new requirements apply, but the national compliance scheme or the related equipment certificates are not yet available. It avoids a regulatory gap that could prevent the connection of Type A modules and follows the same logic as the temporary compliance approach already used for V2G in Annex III.</i>	

Art. 62

<i>Text proposed by the Commission</i>	<i>Amendment recommendation</i>
Articles 4, 6, 13 to 18, 20, 22 to 28, 30 to 35, and 47 to 52 shall apply to power-generating modules which connect to the network from [the date of entry into force of this Regulation plus 24 months].	Articles 4, 6, 13 to 18, 20, 22 to 28, 30 to 35, Article 47, except paragraph 2, and Articles 48 to 51 and 47 to 52 shall apply to power-generating modules which connect to the network from [the date of entry into force of this Regulation plus 24 months], except where the power-generating facility owner has concluded a final and binding contract for the purchase of the main generating plant before that date. In such cases, the power-generating module shall be deemed to connect to the network before [date of entry into force + 24 months] for the purposes of this Regulation. The power-generating facility owner shall provide evidence of such final and binding contract to the relevant system operator at the latest upon submission of the installation document or the power-generating module document, as applicable pursuant to Articles 37 and 39. Article 47(2) and Article 52 shall apply from [date of approval of the national compliance scheme pursuant to Article 49(2) + 24 months] or from [date of entry into force + 48 months], whichever occurs earlier.
Justification <i>The proposed amendment preserves regulatory certainty for projects already committed before the new requirements become applicable. Under RfG 1.0, projects were protected where a final and binding contract for the main generating plant had been concluded within the transitional period.</i> <i>Removing this protection would risk bringing projects ordered before the cut-off date, but connecting afterwards, under the new code. This is particularly relevant given that the period between order placement and connection can take 18 to 36 months.</i> <i>In addition, the amendment ensures that mandatory equipment certificate obligations apply only once the national compliance scheme, accreditation and type-testing framework can realistically be in place, while maintaining a clear backstop deadline.</i>	

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