

Public Consultation on Revision of the network code on requirements for grid connection of generators

EUGINE reply, August 2026

EUGINE, the European Engine Power Plant Association, welcomes the European Commission proposal for the revision of the Network Code Requirements for Generators (NC RfG), which is an important opportunity to ensure that grid connection requirements remain fit for purpose in a rapidly changing electricity system.

A secure, flexible and resilient power system is essential for Europe's electrification, decarbonisation and competitiveness objectives. Engine-based power generation technologies provide important capabilities for system stability, including dispatchable generation, frequency response, voltage control, inertia, short-circuit contribution and ancillary services.

However, several provisions in the draft Delegated Regulation risk introducing requirements that are technically disproportionate, insufficiently technology-neutral or practically very difficult to implement within the proposed timeline. If not corrected, these provisions could increase costs, delay projects, discourage modernisation and decarbonisation investments, and create unnecessary barriers.

As the association representing manufacturers of engines power plants in the EU, and as a member of the GC ESC and SO ESC, EUGINE has historically offered valuable technical and practical insights for the revision of the NC RfG. We would like to highlight several issues that could impede the establishment of a level playing field among various manufacturers and technologies.

Our Recommendations

1. Significant modernisation should not discourage efficiency upgrades
2. Frequency stability requirements should remain technically proportionate
3. LFSM-O requirements should reflect technology capabilities
4. Frequency response activation times should reflect prime-mover limitations
5. Clarify requirements for island operation
6. Power system stabiliser requirements should apply at unit level
7. Certification requirements should remain proportionate and allow site testing
8. Certification timelines need workable transitional arrangements
9. Transitional provisions should protect projects already under development

Significant modernisation should not discourage efficiency upgrades

Article 4 defines significant modernisation for Type C and D power-generating modules. Under the current wording, any change of components, except for changes resulting from maintenance, could trigger the application of the new Regulation to the entire power-generating module.

Even though, the proposed wording on significant modernisation builds on the work of the Expert Group on Criteria for Significant Modernisation (EG CSM), to which EUGINE actively contributed, the draft text should better reflect the full outcome of those discussions.

Updates aimed at increasing generating unit efficiency or reducing emissions should not automatically qualify as significant modernisation. These improvements support decarbonisation and should not trigger full re-compliance of the entire power-generating module.

Similarly, the replacement or upgrade of a single component should not lead to the modernisation of the whole unit. For example, replacing an automatic voltage regulator in a large hydropower unit should not require changes to the synchronous generator. The same applies to nuclear power plants, where replacing an entire generator would not be realistic as a consequence of a component-level change.

We recommend integrating the relevant additional elements proposed by the EG CSM. Efficiency upgrades, emission reduction measures, and component replacements that do not materially change the electrical performance of the power-generating module should be excluded from the definition of significant modernisation.

Frequency stability requirements should remain technically proportionate

Article 14(1)(b) sets three rate-of-change-of-frequency performance criteria for synchronous power-generating modules type A,B,C and D with a maximum power capacity below 140 MW. The current wording should be clarified to avoid any interpretation that these thresholds apply cumulatively or sequentially. They should be understood as **independent performance criteria**.

The text should also make clear that RoCoF requirements do not override the frequency range limitations in Article 14, Table 2. Where the frequency exceeds the applicable time-frequency limits, the power-generating module should be allowed to disconnect in accordance with Table 2.

We recommend clarifying that the RoCoF performance criteria are independent performance criteria and that they remain subordinate to the frequency range limitations in Article 14, Table 2.

Article 27.4(b) also introduces specific RoCoF performance criteria of 1Hz/s over a period of 500 ms for synchronous power-generating modules with a maximum power capacity above 140 MW. EUGINE welcomes that the current wording refers to the need to take into consideration the specific characteristics of prime-mover technology. This principle is important and should be preserved throughout the implementation of the requirement.

LFSM-O requirements should reflect technology capabilities

Article 15 sets requirements for Limited Frequency Sensitive Mode – Overfrequency (LFSM-O). For synchronous power-generating modules, the draft text refers to an active power reduction of 45% of maximum power within 8 seconds.

Although such a response may be possible in some cases, it can create trade-offs with other technical, safety or emissions requirements. Several Member States have already recognised this issue by applying different values or by allowing units to respond within their technical capabilities.

A rigid requirement could also make certification more complex. In practice, the use of case-by-case justifications or exemptions may lead to lengthy discussions with system operators and create uncertainty for manufacturers and project developers.

We recommend that LFSM-O response requirements be defined taking into consideration the specific characteristics of prime-mover technology and in this way allow longer response time based on technical justification.

Frequency response activation times should reflect prime-mover limitations

Table 11 in art. 22 sets a maximum full activation time of 30 seconds for Continental Europe and Nordic, but only 5 seconds for Ireland and Northern Ireland. With a frequency-response range of up to 10 percent of maximum power, full activation within 5 seconds would require very high sustained ramp rates both upwards and downwards.

For several prime-mover technologies, this may not be technically feasible. The requirement should therefore include a clear reference to the technical limitations of the relevant prime mover.

We recommend increasing the Ireland and Northern Ireland value in Table 11 from 5 seconds to 10 seconds, or adding the following clarification: “within the technical limitations of the prime mover, unless justified otherwise in accordance with Article 22(2), point (c)(v)”.

Clarify requirements for island operation

Article 22.4(b) also introduces requirements on island operation. EUGINE welcomes that the current wording refers to the need to take into consideration the specific characteristics of prime-mover technology. This principle is important and should be preserved throughout the implementation of the requirement.

Further clarification is therefore needed on what a power-generating module is expected to do during an undetected island condition, where no information from the relevant system operator is available.

In such situations, the generating unit may not change its control mode automatically, and the stability of the island will depend on several factors beyond the generating unit itself.

Further discussion is also needed on the definition of houseload operation, the removal of the 55% load floor for rapid load rejection in regional island operation, and the proposed synchronisation window.

We recommend clarifying Article 22.4(b) to ensure that island operation requirements are technically achievable and reflect the specific characteristics of different prime-mover technologies.

Power system stabiliser requirements should apply at unit level

Article 27(2)(a) allows the transmission system operator to specify the capacity above which a Type D power-generating module must be equipped with a power system stabiliser.

If this threshold is applied at aggregated plant level, it may lead to disproportionate results. For example, a plant composed of several small generating units could exceed the threshold in aggregate, even though installing a power system stabiliser on each small unit would not be technically meaningful.

Power system stabiliser requirements relate to the behaviour of the individual machine. They should therefore be assessed at power-generating unit level.

We recommend replacing “power-generating module” with “power-generating unit” in Article 27(2)(a), so that the capacity threshold applies to the individual unit rather than to the aggregated plant.

Certification requirements should remain proportionate and allow site testing

Article 39(5) provides that the regulatory authority may require the Power-Generating Module Document (PGMD) to be issued by an authorised certifier. Combined with the requirement for a separate document per module, this could create additional cost and lead time for each individual project.

The compliance process is already complex. Where equipment certificates or other evidence are available, mandatory certifier involvement for every PGMD would not necessarily provide additional system-security benefits.

We recommend deleting Article 39(5).

Article 39.3(b) also refers to compliance test reports demonstrating steady-state and dynamic performance, including actual measured values during testing. In practice, some tests can only be performed after installation, in the real operating environment of the unit.

Without a clear possibility for site testing, project developers and manufacturers could face a circular process: evidence may be requested before connection, although the evidence can only be produced after the unit has been installed and tested.

We recommend clarifying that site testing is a valid route to demonstrate compliance. Where final certificates depend on tests to be carried out on site, an interim operational notification should be possible.

Certification timelines need workable transitional arrangements

Articles 47, 49 and 52 introduce new provisions on equipment certificates and national compliance schemes. While EUGINE supports the objective of harmonising compliance demonstration, the proposed timing may create implementation difficulties.

Equipment certificates can only be issued once the relevant national compliance scheme has been approved, certifiers have been accredited, and the necessary testing and validation procedures are in place. This process will take time. However, the draft Regulation would require the use of certificates

for modules connecting 24 months after entry into force, even if the certification framework is not yet fully operational.

To avoid legal and practical uncertainty, the application of Articles 47(2) and 52 should be linked to the approval of the relevant national compliance scheme. At the same time, Article 49(2) should set a clear deadline for the approval of such schemes, so that implementation does not remain open-ended.

During the transition, existing national certificates demonstrating conformity with equivalent technical requirements should continue to be accepted. For Type A modules, manufacturer declarations of conformity should also be accepted until the new framework is operational.

We recommend introducing a clear transitional framework that allows compliance to be demonstrated in practice from the first day of application of the new Regulation, without delaying projects or creating uncertainty for manufacturers, project developers, certifiers and system operators.

Transitional provisions should protect projects already under development

Articles 61 and 62 make the applicability of the new Regulation depend on the date when a power-generating module “connects to the network”. This creates uncertainty for projects that are already well advanced, especially where the main generating equipment has already been ordered.

Large power generation projects involve long development timelines, including permitting, grid connection procedures, transformer lead times and construction schedules. As a result, a project may have a final and binding equipment contract before the end of the transition period, while the actual connection takes place only afterwards. In such cases, applying the new requirements solely on the basis of the connection date would create legal and commercial uncertainty for manufacturers and project developers.

The wording “connects to the network” should also be clarified, as it determines which regulatory regime applies. This is particularly relevant for Type D projects, where auxiliaries may be energised before the final operational notification.

We recommend introducing a clearer transitional regime that protects projects already under development and provides legal certainty on the applicable requirements. This should include contract-based grandfathering for projects with a final and binding contract for the main generating plant concluded before the end of the 24-month transition period, as well as a precise definition of “connects to the network”, based on first energisation of the power-generating module and, for Type D modules, the energisation operational notification.

ANNEX – EUGINE amendments recommendation

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 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.	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 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	

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.

Art. 49 (2)

<i>Text proposed by the Commission</i>	<i>Amendment recommendation</i>
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

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).

Art. 52 (1)

<i>Text proposed by the Commission</i>	<i>Amendment recommendation</i>
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 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.	

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 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.	

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.

Art. 62	
Text proposed by the Commission	Amendment recommendation
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>	

EUGINE is the voice of Europe's engine power plant industry. Our members are the leading European manufacturers of engine power plants and their key components.

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