

Annex – List of UFE’s amendment proposals

In the “Amendment proposal” column, **additions are shown in bold** and ~~deletions in bold strikethrough~~.

Article	Amendment proposal	Reasoning	Relation to other provisions
Recitals 2, 6 and 12; Article 1(1)	Explicitly recognise that RfG requirements must ensure not only system security, but also the safety of persons and customer installations and the safe operation of transmission and distribution networks.	Requirements intended to keep generation connected during disturbances must remain compatible with protection schemes and safe network operation, especially on LV and MV networks.	-
Recital 13; Article 2 definitions; Articles 36, 38, 47, 48 and 52	Clarify throughout the Regulation the distinction between (i) equipment capabilities/constructive requirements, which may be harmonised at Union level, and (ii) the operational configuration and settings applied nationally or locally under regulatory oversight.	This would preserve the benefits of standardisation for mass-produced equipment while allowing settings to reflect national system needs, network topology and protection philosophies. It would also remove ambiguity in the compliance and certification framework.	-
Recital 31; new Article 57a (derogations)	Restore the possibility for relevant system operators and TSOs to request derogations for classes of power-generating modules, broadly based on former Article 63 of RfG 1.0, subject to approval by the regulatory authority.	Class derogations remain necessary where a requirement is technically impossible, disproportionate or incompatible with local network or technology-specific constraints. This is particularly relevant for series-produced LV/MV assets and for specific hydro or nuclear constraints.	-
2(66)	66. ‘V2G electrical charging park’ means an installation that has a single connection point to the network and where one or more V2G electric vehicles and associated V2G electric vehicle supply equipment can be simultaneously connected; a V2G electrical charging park may include power-generating units of other underlying technologies than V2G electric vehicles and associated V2G electric vehicle supply equipment.	The first part added in bold includes the EV supply equipment to complete the definition. The second part added in bold clarifies that capacities of V2G EVs/EVSEs are not aggregated, even if combined behind the connection point with units of different technologies (PV, storage...).	Article 3(3)(d)
3(2)(e)	(e) existing power-generating modules which were not falling within the scope of application of Regulation (EU) 2016/631.	UFE suggests explicitly excluding from RfG 2 those facilities that were not in the scope of RfG 1 and that still apply their declared capacities.	–
4(2)(d)	(d) for Type C and D, a change of components of a power-generating module except for changes resulting from maintenance and repair	The change of components (excluding maintenance) for Types C and D would now also be considered a significant modernisation, which does not	–

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	<i>activities and spare parts, whether or not those parts are purchased new at the time of their incorporation in the power-generating module</i>	reflect the compromise reached during the consultations conducted by ACER with stakeholders.	
4(3)	<i>For each criterion listed in paragraph 2 above, the relevant TSO's proposal shall specify the requirements of this Regulation that shall apply to the entire modernised power-generating module or only to the modernised part of the power-generating module.</i>	UFE suggests keeping the wording agreed in the ACER recommendations, leaving the TSO in charge of applying the subsidiarity principle. Indeed, the Commission's proposal may deter investments and efforts to modernise or extend the lifetime of existing facilities, even though these investments contribute to security of supply and the energy transition.	–
5(3)(b)	<i>(b) power-generating units of the same underlying technology, where they form an economic unit and where they have a single connection point shall be assessed on their aggregated capacity, unless otherwise stated in this Regulation;</i>	UFE seeks clarification on the definition of an economic unit, which is not defined in Article 2. Clarification on the principles defining “aggregated capacity” would limit heterogeneous interpretation among MS. UFE suggests adding the part in bold to avoid any misunderstanding with the statement of Article 5(3)(d).	5(3)(d)
Article 5(4) – national setting of banding thresholds	Keep the final decision on national thresholds with the designated national authority/regulator, based on a TSO proposal and with mandatory consultation/coordination of DSOs where distribution-network impacts are material, rather than imposing systematic TSO–DSO co-decision.	Article 5(4) – national setting of banding thresholds	
Article 5(8) – V2G protection settings	Allow protection settings for V2G electric power supply equipment to be adapted to the connection voltage level (LV/MV) by the relevant DSO in coordination with the TSO and under the national implementation framework.	Uniform constructive capabilities can be harmonised at EU level, but actual protection settings may need to reflect the different technical characteristics of LV and MV networks.	
6(6)	<i>For pump-storage generating modules which are doubly-fed induction machines and full-converter variable speed machines, the parameters in Table 7.1 and 7.2, or Table 8.1 and 8.2</i>	The requirement for doubly-fed machines must refer to Tables 7.1 and 7.2, which apply to synchronous machines and not to those dedicated to PPM. Indeed, the slow operation speed of the shut-off and control valves of the hydraulic circuit, designed to avoid overpressure phenomena, is a safety requirement which does not allow the machine to perform a fast change of	–

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		its power setpoint.	
Articles 15(5)(a) and 18(6) – initial delay	Allow an intentional delay in the start of active-power response where such a delay is required by the relevant system operator, in coordination with the TSO, to ensure the operational security of the connecting network.	In some Member States a short delay is necessary to limit unintentional islanding and to maintain safe network operation.	
15(5)(b)(i)	<i>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.</i>	All hydro facilities must be exempted from this time-domain requirement and should only be required to perform as stated at the beginning of the sentence, i.e. “as fast as technically feasible”. This modification is needed to ensure that (i) flow variations upstream and downstream of hydro facilities and (ii) transients inside penstocks are kept under control.	–
15(11) and 15(13)	<i>(Removal of the requirement for synchronous category D modules through Article 27(1))</i>	The requirement to be equipped with a communication interface for remote power reduction (combination of Articles 15(11) and 15(13)) is not suitable for hydro power plants or thermal generation. For nuclear power plants, it would contravene nuclear safety principles by giving the system operator the possibility to remotely decrease the active power of the plant, affecting the functioning of the primary circuit as defined in the general operating rules. For hydro power plants, the output active power has a direct impact on river flows and water levels in reservoirs and rivers; the management of these flows and levels incorporates a range of constraints (environmental, safety-related, and impacts on third parties) that are not compatible with external, context-independent control of power output. Article 27(1) should remove these two requirements for category D synchronous PGM, as agreed in the 2023 ACER recommendations following the technical discussion between stakeholders.	Article 27(1)

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16	<i>(Removal of the requirement for synchronous category D modules through Article 27(1))</i>	The requirements for autonomous grid connection (Article 16) are not feasible for nuclear power plants and should apply to generators incidentally disconnecting from the grid with no human operators on site, which is not the case of nuclear power plants. A requirement for an autonomous connection of a nuclear power plant without the plant operator being in charge is not aligned with nuclear safety principles.	Article 27(1)
Article 27(1); Recital 16 – reconnection	For distributed generation, reconnection requirements should remain coordinated with the availability of the necessary communication, observability and control systems.	Conversely, uncontrolled reconnection of distributed generation before command-and-control systems are operational may complicate safe system restoration.	
Recital 26; Article 17(5); related HVRT/OVRT provisions	Remove the fixed Type A HVRT requirement of 1.3 pu for 100 ms and 1.2 pu for 1 minute, or at minimum allow the relevant system operator to set proportionate national values within an EU-defined range.	The proposed values are more stringent than for some larger units and may be incompatible with LV/MV customer installations and protection devices. The benefit has not been sufficiently demonstrated and the requirement should remain consistent with established protection coordination and standards such as EN 50549.	
22(3)	<i>(Correction of the cross-reference made by Article 27(1))</i>	Article 27 should not exempt category D assets from the robustness requirement of Article 22(3); Article 27(1) should instead refer to an exemption from the requirement of Article 24(3) related to voltage dips, as previously provided in RfG 1.0.	Article 27(1)
24(3) – Table 14.1	<i>Urec2: 0,85-0,9</i>	UFE does not support the hardening of the voltage dip criteria imposing the value of 0.85 pu and advocates returning to the wording of RfG 1.0.	–
27(1)	<i>Type D synchronous power-generating modules shall fulfil the requirements for Type A power-generating modules set out in Article 14(1), point (a), in Article 15, except for Article 15(11) and Article 15(13), and, Article 16, Articles 17 to 18 and Article 24, for Type B power-generating modules set out in Article 20 and Article 25, for Type C power-</i>	As stated in the note and in the lines regarding Articles 15(11), 15(13) and 16 above, Type D synchronous PGM should not be required to fulfil the Type A PGM requirements arising from Articles 15(11), 15(13) and 16. As stated in the line regarding Article 22(3), Type D synchronous PGM should be required to fulfil the Type C robustness requirement of Article 22(3).	See lines on Articles 15(11), 15(13), 16, 22(3)

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	<i>generating modules set out in Article 22(1), (2), (3), (4) and (5) and Article 26, for type D power-generating modules set out in Article 26, and the additional requirements set out in this Article.</i>		
45(1)	<i>“1. Following a public consultation in accordance with Article 10 and in order to address 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, the relevant TSO, , in close coordination with the relevant DSOs where appropriate, may propose to the regulatory authority concerned, or where applicable, to the Member State to extend the application of this Regulation to existing power-generating modules. In this respect, within 2 years of the entry into force of this Regulation, in each Member State, the TSO in coordination with the DSOs shall carry out a cost-benefit analysis in accordance with Article 46, in order to evaluate the need to apply all or some requirements of this Regulation to existing power-generating modules and submit the proposal to the regulatory authority in accordance with paragraph 5. (...)”</i> <i>The cost-benefit analysis shall capture all material costs and technical impacts, including producer retrofit costs, protection-system adaptations, operational procedures and impacts on the safe operation of distribution networks.”</i>	Although this provision is notably intended to allow TSOs, in close coordination with the relevant DSOs where appropriate, to retroactively apply some requirements to certain classes of facilities – implementing the lessons drawn from the Iberian blackout – in order to contribute to system stability, in its present wording it is a source of huge industrial and financial risks and uncertainties for producers after the entry into force of the Regulation, and repeatedly in the future. The notion of exceptional circumstances to resort to this measure should remain; UFE therefore suggests keeping the wording of RfG 1.0 as the first sentence of this paragraph (in bold in the left-hand column) to state the general principle and then keep the sentence on the CBA to be performed within 2 years (as a consequence of the Iberian blackout). Beyond consequences for producers, it is necessary to include the consequences for system operators	–

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Article 46 – cost-benefit analysis	Require CBAs supporting the application of new requirements to existing assets to capture all material costs and technical impacts, including producer retrofit costs, protection-system adaptations, operational procedures and potential impacts on safe distribution-network operation.	A complete assessment is necessary to avoid shifting disproportionate costs to generators or overlooking costs created elsewhere in the system. Alternatives delivering equivalent system benefits should also be considered.	
61(3)	<i>“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 for 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] the power-generating facility owner has concluded a connection agreement by two years after the entry into force of this Regulation; those for which the power-generating facility owner has concluded a final and binding contract for the purchase of the main generating plant by two years after the entry into force of this Regulation.”</i>	The definition of existing facilities is more restrictive, limited to those being connected to the network within the two years after entry into force of the new code (Article 61). The “purchase of the main generating plant” criterion (RfG 1, Article 4(2)(b)) has been removed, although it is a very dimensioning and essential timeline element for some synchronous technologies’ projects (such as nuclear or hydro). This removal is also an additional, unacceptable risk for already launched projects (expected to apply RfG 1) now potentially falling under the scope of RfG 2. Being connected to the network is, moreover, a project milestone less precise than the signature of the connection agreement. For the clarity of the text, the criterion in Article 61(3)(b) should therefore be defined as the conclusion of a connection agreement, and an additional criterion aligned with RfG 1 should be introduced at the end of the paragraph. More broadly, the reference milestone must reflect the dynamics of connection processes: the relevant milestone is the one that materialises the project’s effective entry into the connection queue and fixes the technical framework applicable to the sizing studies – in France, the signature of the connection offer (proposition technique et financière, PTF) on the transmission grid, and the T0 milestone on the distribution grid.	–
General provisions (Articles 7 and 10)	<i>Any requirement additional to, or not explicitly provided for by, this Regulation shall be submitted by the relevant system operator to the competent regulatory authority for approval, in accordance with Article</i>	The requirements set out in the code are not exhaustive. Additional requirements, or requirements not explicitly provided for by the code, should be subject to validation by the competent authorities and regulators	Articles 4, 45

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	10.	and should not be left to the sole appreciation of system operators. This validation step is needed to guarantee their necessity and proportionality, and a balanced, non-discriminatory application across Member States and technologies.	
4(2) – hybridisation and co-located storage	<i>The addition of equipment to an existing power-generating facility, in particular the addition of a co-located electricity storage system or of any other hybridisation equipment, shall not in itself constitute a significant modernisation. The requirements of this Regulation shall apply only to the newly installed equipment or to the equipment directly affected by the modification.</i>	Treating hybridisation as a substantial modification would amount to retroactively applying new technical prescriptions to duly authorised installations already in operation, creating unjustified legal and economic uncertainty. It would also discourage hybrid projects and the integration of storage, precisely when these are needed for flexibility, RES integration and the optimisation of existing connection capacity. Compliance obligations should be limited to the newly installed equipment or to the equipment directly affected by the modification.	Article 4(3)
Article 29 – grid-forming capability	Base any mandatory deployment of grid-forming capability on a national roadmap identifying system needs by voltage level. Do not presume that all Type A and B power park modules will automatically become subject to the requirement; the regulatory authority should determine whether and from when the requirement is necessary.	Grid-forming can support system stability, but its need and maturity differ by voltage level. At lower voltage levels, potential islanding and safety impacts remain insufficiently assessed and the technology is not yet extensively proven on distribution networks.	
Grid forming requirements (Types C and D)	<i>Grid forming capability shall be required where an objectively justified system need has been explicitly identified by the relevant system operator and approved by the competent regulatory authority.</i>	Grid forming capability should not be imposed systematically on all Type C and Type D facilities. These capabilities have significant consequences on converter sizing and on the storage or headroom required to deliver the instantaneous power contribution, and therefore on project costs. Requirements should be based on an objectively justified system need, explicitly identified by the relevant system operator and validated by the regulatory authority, taking into account the characteristics of the synchronous area, the local grid situation and the alternative means available to deliver the same service.	–

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EC additional proposal 1	<i>Harmonisation of banding thresholds</i>	This point had already been discussed and resulted in the ranges proposed by ACER. The concept of “significance” differs across synchronous areas (Continental Europe vs the Nordic area), which differ vastly in electrical size; the argument also holds within a single synchronous area (local grid characteristics such as voltage, generation mix). Each national TSO, under the oversight of the national regulator, is best positioned to determine the appropriate level. UFE considers the ranges proposed by ACER to be appropriate and suggests retaining them.	–
EC additional proposal 2	<i>Further national harmonisation (at least for Types A and B)</i>	This proposal is not relevant considering its impacts on small-scale hydropower (micro-hydro: 20 to 500 kW; mini-hydro: 0.5 to 2 MW). Lowering the A/B threshold in France (currently 1 MW) would move a number of these plants into category B, increasing regulatory requirements and associated upgrade costs, and potentially hindering investment in this dispatchable, local and low-carbon form of energy, which is highly valuable to the French and European electricity systems.	–
EC additional proposal 3	<i>Narrowing the range of significant modernisation</i>	This proposal is not relevant either: narrowing the range leaves less leverage at national level, whereas national TSOs – under the supervision of the regulator – are best placed to determine appropriate levels in consultation with stakeholders. It also risks curbing investment in capacity upgrades for low-carbon generation (nuclear, hydro) at the very time they will be needed, in view of the expansion of electrification.	–