



**Common Position of EURELECTRIC DSOs, CEDEC & GEODE**  
**on**  
**ACER Framework Guidelines on Grid Connection and Related Draft**  
**Network Code (Requirements for grid connection applicable to all**  
**generators) by ENTSO-E**

As representatives of distribution system operators (DSOs) in Europe, we consider the harmonisation of the connection requirements at EU level as a key factor to foster the development of the single European electricity market. The requirements set by the network codes should aim at enhancing cross-border trade and creating a level playing field for all market participants.

We regret that neither the Framework Guidelines nor the draft Network Code are accompanied by relevant Impact Assessments outlining main policy options. In particular, requirements that are new or more severe compared to existing international standards and existing national codes must be justified from technical viewpoint and underpinned by comprehensive cost-benefit analysis to be made for all users. This should demonstrate that they represent the most optimal/cost-effective solutions, ensure transparency and prevent unnecessary over-regulation. For example, alignment of processes which are not directly related to technical requirements for grid connection irrespective of the associated costs would only result in costly rewriting of national codes without bringing any added value.

This is particularly relevant in the situation when Regulation (EC) 714/2009 states that the network codes drafted by ENTSO-E should be developed “only for cross-border network issues” while a definition of this term is missing. In addition, we lack a clear upfront view on the future system operation and its functional needs. We thus deem it very important that the Framework Guidelines and Network Codes on System Operation are developed at least in parallel with requirements for grid connection, in order to understand the rationale behind the requirements as listed in paragraph 6, chapter 2.1 of the ACER Framework Guidelines.

In the areas where RES integration (which is not, strictly speaking, a goal emerging from Regulation (EC) 714/2009) has no impact on cross-border issues, ensuring implementation of the required functionalities should be subject to the subsidiarity principle. In other words, definition of precise requirements/parameters should be made at the national level.

While fully respecting the ENTSO-E’s mandate and expertise to draft network codes, we strongly believe that developing requirements for generating units directly connected to the distribution level, as foreseen by the current Framework



Guidelines, implies that TSOs will via network codes impose requirements on DSOs, disregarding their responsibilities for the connection of embedded generation.

DSOs must be actively involved in the drafting of network codes where they are affected, not only as consulted parties. Otherwise, network codes should not include any requirements beyond the interface between TSO and DSO. Specifically, network codes must not include requirements towards users connected to DSOs' network which have not been elaborated with active participation and agreement of DSOs. The Framework Guidelines should foresee a procedure to integrate DSOs in the drafting process of the network codes carried out by ENTSO-E in the provisions that directly affect the operation of distribution networks.