

Feedback

To public consultation on the revision of RfG - Ares(2026)6819642

Zoetermeer (NL), 25 August 2026

Energy Storage NL (ESNL) welcomes the opportunity to provide feedback on the European Commission's proposed revision of the network code on requirements for grid connection of generators a.k.a. RfG. The revision comes at an important moment for the European electricity system. Rapid growth of inverter-based generation, electricity storage, electric vehicles and other flexible resources make it necessary to ensure that connection requirements continue to support system security, market integration and the energy transition.

ESNL supports the Commission's objective of modernizing the Requirements for Generators framework and recognizes the need for clearer and more future-proof technical requirements. Energy storage systems come in all shapes and sizes and enable a fully decarbonized energy system. Above all; **the network code should facilitate and reward the strengths of energy storage technologies to stabilize the grid** instead of limiting its capabilities. At the same time, the revised Regulation should remain proportionate, technology-neutral and practically implementable. Requirements should be linked to demonstrable system needs, should take account of national network characteristics and should avoid unnecessary administrative or compliance burdens for asset owners. Caution is warranted to proportionate regulated grid stabilization requirements across all generator classes and formalize compensation mechanisms for assets which are the primary source of grid stabilization.

This response focuses on provisions where further clarification, adjustment or national implementation flexibility would improve legal certainty and support efficient deployment of generation, storage and other emerging technologies. In particular, the Netherlands invites the Commission to ensure that new or extended obligations are accompanied by clear technical justification, appropriate cost-benefit assessment and sufficient flexibility to reflect technology-specific capabilities and local system conditions.

If any of our remarks warrant further discussion or elaboration, the commission is more than welcome to reach out to our team of project managers. ESNL represents a diverse scope of 230 member companies active in the highly advanced Dutch (energy) market.

With best regards,

Max van der Werff
Project Manager

Feedback

Please note our feedback is not ordered by priority, our feedback is ordered according to the article numbering in the proposed revision of RFG.

Article 4: significant modernisation

Article 4 should be limited to changes that are genuinely material from a system perspective. For electricity storage modules (ESMs), DC-side changes such as replacing battery modules should not qualify as significant modernisation, as AC network-code compliance is primarily determined by the inverter and control systems, including the EMS.

Only material changes to AC-facing capabilities, preferably involving the inverter and/or EMS, should warrant reassessment of grid compliance requirements. Without this clarification, Article 4 could discourage low-cost upgrades of storage capacity and create incentives for the early decommissioning of functional equipment.

ESNL recommends adopting the approach of Article 4a(3) of ACER's 2023 recommendation, allowing competent national actors to determine whether revised requirements apply to the entire module or only to the modernised part. Article 4(2)(c) should also clarify that only material changes to frequency stability or active power management capabilities trigger significant modernisation.

The exclusions in ACER's 2023 recommendation for repair activities and the purchase of spare parts should be restored for all categories of power-generating modules. The independent function of Article 4(2)(d) remains unclear, since component changes that do not alter capacity or capabilities appear qualitatively different from the changes addressed in points (a) to (c).

Article 4 should also include a proportionate notification procedure. Owners should know when they must inform the relevant system operator of a proposed or completed change, what information must be supplied and how the subsequent assessment of significant modernisation is to be conducted.

Article 6(11): electricity storage modules

Article 6(11) should better reflect the specific characteristics of ESMs. Applying generator requirements to storage without sufficient adjustment may overlook state of charge, bidirectional operation and contracted service obligations, and could lead to oversizing, reduced economic viability and inefficient system outcomes. ESNL recommends clarifying that requirements for storage are operating-mode dependent and that exemptions should be possible where capabilities are technically infeasible or not contracted as system services.

Article 7(5): approval of site-specific requirements

Article 7(5) should preserve national discretion for site-specific requirements. Mandatory prior approval by the designated entity in every individual case would create unnecessary administrative burden, particularly where such requirements are already agreed in connection and transmission agreements and remain subject to dispute settlement and general regulatory oversight.

Article 14: frequency stability requirements

Article 14 should remain focused on demonstrated minimum system needs rather than best-available-technology assumptions. Frequency range, RoCoF withstand and protection requirements must be calibrated to technical feasibility, proportionality and technology-specific constraints, particularly for smaller or legacy assets where disproportionate requirements could restrict technology diversity and increase costs.

Article 22(4)(a): black-start and restoration services for ESMs

Article 22(4)(a) should recognise that ESMs can provide valuable black-start and restoration support, while taking account of their available energy content and discharge duration. ESNL recommends specifying black-start requirements on the basis of the functional contribution needed for system restoration, rather than assuming the same duration capabilities as conventional generation technologies. As the electricity system is to develop towards net zero, storage and other net zero technologies should be properly integrated into black-start and restoration frameworks. Opposed to thermal plants, ESMs are uniquely capable to enable renewables to restart production while maintaining fast transients in available balance between supply and demand. TSO's should be obligated to consider ESMs in conjunction with (distributed) renewables and set realistic duration requirements as to allow ESMs into black start restoration bids.

Article 29: grid-forming capability

The introduction of grid-forming capability as a future requirement is understandable from a system-resilience perspective, but broad mandatory requirements would be premature. Harmonised standards, practical deployment experience and commercial frameworks are still limited, especially for BESS and other converter-based assets. ESNL recommends keeping grid-forming capability needs-based, phased and proportionate, with mandatory application limited to clearly identified system needs and accompanied by appropriate remuneration. Our recommendation is to rely less on network code requirements for inertia yet rely more heavily on the TSO contracting assets specifically to provide adequate grid-forming capabilities within a strong governance structure.

Article 30(3): scope of grid-forming requirements for Type B modules

ESNL considers this scope too broad. Grid Forming is intended to replace capabilities of outgoing synchronous generators which are typically at least 100 MW in capacity. Grid-forming obligations for ESMs should only be applicable to systems of similar scale as the generators they replace which are typically connected at high-voltage level. At high voltage connection, the relevance for system stability is clearer and the need for such capabilities can be more readily justified. Furthermore, small collocated systems should be excluded from grid-forming requirements regardless of their connection type.

The proposed 10 MW threshold for grid-forming capabilities is too low and risks bringing relatively small projects within the scope of technically and commercially immature requirements. Applying grid-forming obligations to projects connected below 110 kV merely because of feeder configuration would be disproportionate and could create unnecessary project and financing

risks. ESNL recommends limiting Article 30(3) to high-voltage connections and, in any event, reconsidering the 10 MW threshold so that any mandatory requirement remains needs-based, proportionate and linked to appropriate remuneration.

Article 31(4)(a): synthetic inertia requirements for ESMs

Article 31(4)(a) requires TSOs to specify the level of synthetic inertia, but does not clarify how this should be determined for ESMs. ESNL recommends requiring a transparent methodology that takes account of state of charge, available energy content, response duration and recovery requirements, so that synthetic inertia obligations are applied consistently and proportionately.

Article 31(4)(b): additional energy requirements for ESMs

Article 31(4)(b) allows TSOs to require additional energy beyond the inherent energy capability of a module, but does not explain when such requirements may be imposed or how the requested volume should be determined. For ESMs, such requirements directly affect sizing, costs and operational flexibility. ESNL recommends limiting additional energy requirements to demonstrable system needs and applying them in a technology-neutral and proportionate manner. Any additional costs the asset owner incurs because of these requirements should be compensated by the TSO.

Articles 45 and 46: application of new requirements to existing modules

The application of new requirements to existing modules should remain proportionate and needs-based. ESNL recommends restoring a staged approach in which a qualitative assessment first identifies a concrete system need before TSOs and DSOs are required to carry out a full cost-benefit analysis (CBA). Where the CBA shows that adaptations primarily serve wider societal or system benefits, the resulting costs should not be placed on individual asset owners alone. Furthermore, the TSO should include the option of commercially contracting additional grid-forming capacity and synthetic inertia in the CBA.

Article 52: equipment certification

Article 52 is a useful step towards clearer equipment certification, but fragmented national certification processes could still increase costs and complexity for projects active across several markets. ESNL recommends moving towards a single EU-wide or strongly harmonised certification process, especially for standardised equipment and mass-market products.

Articles 55–57: derogations

The derogation framework should reflect the flexibility recognised in Recital 27. Relevant system operators should be expressly allowed to request individual derogations where local network circumstances, technology-specific constraints or implementation issues justify a more proportionate solution without undermining system security.

The Regulation should also allow derogations for clearly defined classes or fleets of power-generating modules. A collective procedure can be more efficient than repeated individual applications, provided that the regulatory authority assesses necessity, proportionality, duration and cumulative system impacts. However, derogation should not cause other generator classes to “fill the gap” in a disproportionate manner. If derogation were to lead to substantially more

stringent and costly capabilities to be required for ESMs this would be a strong argument against derogation.

Article 57 should clarify that the assistance obligation for TSOs and relevant system operators is substantive. Individual applicants should not be expected to prepare system-wide modelling, cost-benefit inputs or cross-border impact assessments where the necessary data and expertise sit primarily with the system operator.

Article 61(3): transitional provisions and grandfathering

The transitional regime should provide sufficient legal certainty for projects already under development. ESNL recommends retaining a grandfathering arrangement based on the conclusion of a final and binding contract for the main generating plant, combined with notification, rather than relying solely on the connection date, which may depend on factors outside the project owner's control.