

CurrENT response to ACER draft amendments to NC HVDC

CurrENT Europe would like to thank ACER for the opportunity to consult and provide feedback on the recent draft amendments to the network code on grid connection requirements for high voltage direct current systems and related power park modules (NC HVDC). We greatly value the openness and transparency with which ACER has engaged stakeholders throughout this process, and we appreciate the efforts taken to ensure that the diverse perspectives within the industry are considered.

Upon a thorough review of the proposed amendments, we are pleased to share our satisfaction with the content of the revised code. It is encouraging to see the expansion of its scope, which we believe is vital for accommodating the evolving needs and innovations within the energy sector.

We are particularly pleased to note that ACER has maintained its preference for functional requirements over technology-specific mandates. This approach, focusing on the desired outcomes rather than prescribing particular technologies, fosters an environment of innovation. It allows industry players to develop and implement solutions that are not only more efficient but also exhibit superior performance. This flexibility is crucial as it encourages the continuous improvement of HVDC systems and ensures that the network code remains relevant in the face of rapid technological advancements. For the same reason, we would like to highlight the importance of maintaining flexibility in the selection of technologies subject to the requirements. It is crucial that the network code continues to accommodate innovative solutions, such as high-capacity superconducting transmission technologies and other advanced MVDC and HVDC technologies, ensuring they are comprehensively covered within the regulatory framework.

Furthermore, we appreciate ACER's attentiveness to the cascade effects of changes within the code, ensuring that all amendments are harmonized and coherent across the entire code. We trust that as you continue to gather and incorporate stakeholder input, this meticulous method will be upheld.

While we are generally satisfied with the amendments, we have submitted additional suggestions for your consideration, that we believe will improve the regulation. These comments and suggestions can be found in the document we have uploaded to the designated section.

We remain committed to supporting ACER in this important work and are happy to engage further if there are any follow-up questions or discussions needed. Please do not hesitate to reach out to us should you require any additional input or clarification.