

Reinstate established deadlines for the national implementation of the NC RfG 2.0

VDE FNN expressly welcomes the present draft of the Network Code Requirements for Generators (NC RfG) published by the European Commission. This new draft, which is largely based on ACER's proposal of December 2023, was subject to [public consultation](#) from 8 July to 25 August 2026. Already in 2025, VDE highlighted the consequences of the de facto [‘deprioritisation’](#) of the Connection Network Codes in an [FNN position paper](#) that called for their swift publication. While FNN welcomes the release of the revised draft, it also notes a significant change compared with the previous draft which is critical for national implementation: the implementation period in Article 7(6) has been reduced from two years to nine months. The substantially shorter deadline would have an impact on the established committee work within the VDE FNN, as well as the necessary engagement of system operators, manufacturers, certification bodies and other stakeholders. Particularly considering the increasing number of tasks and the expanded scope of the regulation, ensuring a high-quality and broadly coordinated national implementation within these timeframes would be extremely challenging. In addition, the shortened transition period under Article 62 may leave manufacturers, power-generating facility owners and certification bodies with insufficient time to adapt to and implement the new requirements. Our main demands are therefore:

Reinstate the 24-month deadline for national implementation in Article 7(6) of the NC RfG 2.0 to ensure a transparent, technically sound and stakeholder-coordinated implementation.

Extend the transitional period under Article 62 so that manufacturers, plant operators and certification bodies can implement the requirements in a timely and appropriate manner.

About the VDE Forum for Grid Technology and Grid Operations (VDE FNN)

The VDE Forum for Grid Technology and Grid Operations (VDE FNN) develops the future requirements for the grid operation. The aim is to always ensure safe system operation with 80 per cent renewable energy.

Shortening the implementation deadline under Article 7(6) hampers the consensus-building process for the national implementation of NC RfG 2.0

Implementation of the NC RfG 1.0:

In 2021, five years after the NC RfG 1.0 ((EU) 2016/631) came into force, the European Commission published a [report](#) on the national implementation of the Regulation. The report identified delays across Europe, particularly in defining the non-exhaustive requirements and determining the capacity thresholds. It showed that many Member States had not completed the national implementation within the two-year implementation period provided for in Article 7 of the previous NC RfG 1.0.

In a 2021 report, ACER also highlighted significant differences between Member States in terms of the state of implementation and compliance with the requirements. According to this report, by 2019 – three years after the NC RfG came into force – [only around 36 per cent](#) of Member States had completed full implementation.

The national implementation of the NC RfG in Germany, set out in the Technical Connection Rules (VDE-AR-N 4110/4120/4130), was [published](#) by the VDE FNN on 17 May 2018 following its submission for EU notification, exactly two years after the NC RfG came into force in 2016.

New draft NC RfG 2.0:

The current draft contains significant changes compared to ACER's December 2023 draft, on which VDE FNN commented during its consultation in 2023. The regulation has undergone a comprehensive restructuring and has been expanded through the introduction of new requirements. Key additions include revised provisions on compliance and certification, new requirements relating to grid-forming capabilities, and a dedicated article addressing significant modernisation.

In addition, the draft contains new transitional provisions and, in some cases, significantly shorter deadlines. Of particular concern for national implementation are the significantly shortened deadline for defining and adopting national requirements and methods under the NC RfG 2.0. Whilst the existing regulation provided for periods of up to two years for many national implementation tasks, Article 7(6) stipulates that national requirements, methods and parameters must in future be submitted within nine months of the regulation coming into force.

Impact of the shortened implementation deadline:

The implementation deadline under Article 7(6) of the new draft NC RfG 2.0 for the development of national requirements, methods and parameters by the relevant system operators has been reduced from two years to nine months. The six-month deadline under Article 7(8) for the approval of these proposals by the designated entity remains unchanged.

This means that the entire process, including approval, would have to be completed within a total of 15 months (9 months for development and 6 months for approval). Following the same logic as other non-exhaustive requirements, the new Article 29 on grid forming capabilities, which is essential for system stability, would also need to be defined and approved at national level within this 15 month period.

This reduction has significant adverse effects on the established committee work within VDE FNN, as well as on the necessary involvement of network operators, manufacturers, certification bodies and other stakeholders. It is difficult to ensure high-quality and broadly coordinated national implementation within this timeframe.

In addition, an extension of the transition period in Article 62 is required. Otherwise, manufacturers, power-generating facility owners and certification bodies would not have sufficient time to make the necessary adjustments and to develop and procure the required components.

Main request:

Amendment proposal	Reasoning
Article 7(6) <i>Where the relevant system operator needs to submit a new proposal or to update an existing proposal setting out values to implement the requirements of this Regulation, or the methodology for calculating or establishing them, as appropriate, the relevant system operator shall submit that proposal, update or methodology to the designated entity for approval by [date of entry into force of this Regulation plus 9 24 months]. The designated entity may provide for a shorter time period for all or parts of the requirements or the methodologies.</i>	A shorter implementation deadline would have significant consequences for national implementation as well as for the necessary engagement of all stakeholders, including system operators, manufacturers and certification bodies. It will be difficult to ensure high-quality and broadly coordinated national implementation within this timeframe. Given the new structure and provisions in the NC RfG 2.0, it would be unrealistic to shorten this timeframe by more than one year. It should also be borne in mind that the implementation of the NC RfG 1.0 was completed by only a few Member States, even within the previous two-year deadline. Reinstating the deadline in Article 7(6) would also require an extension of the transition period in Article 62. Otherwise, there would be no appropriate deadline for manufacturers, power-generating facility owners, and certification bodies to implement the necessary developments and to develop and procure the required components.
Article 62, Paragraph 2 <i>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 24xx months].</i>	Extend the new deadline in Article 62 accordingly in order to give manufacturers, power-generating facility owners and certification bodies the opportunity to adapt to the new requirements.

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