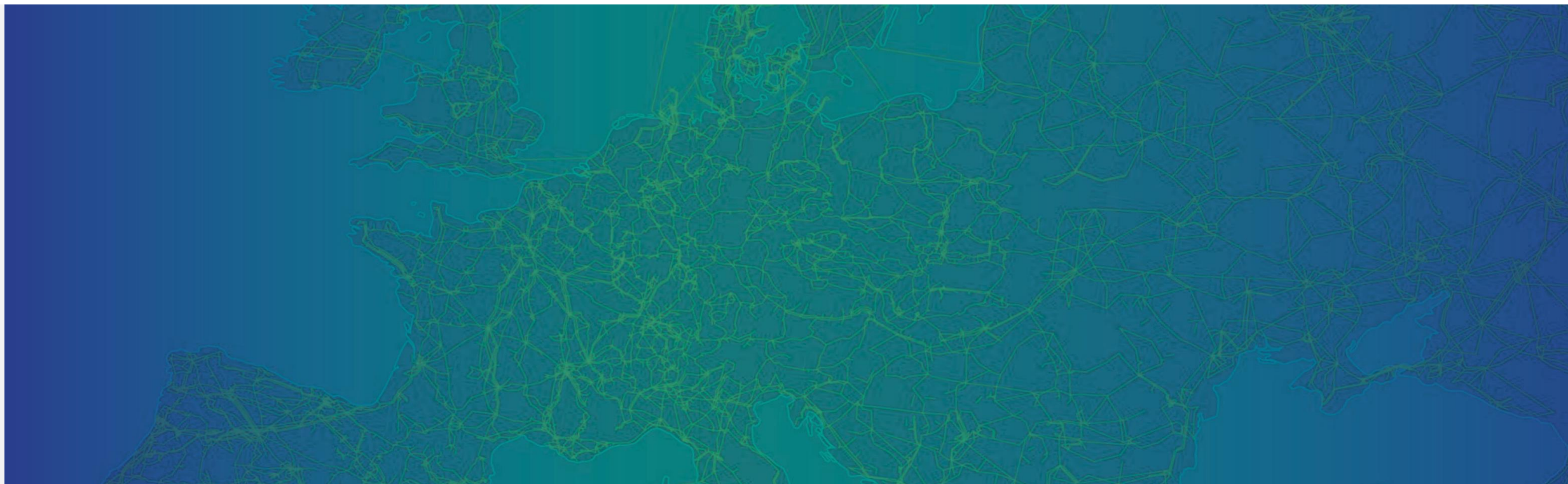


ENTSOE position EG HCF proposals to RfG legal text

28th September 2023 – GC ESC meeting



Presented by: Sergio Martínez Villanueva (REE TSO, Spain)

1. MoM 15th June GC ESC meeting on HCF

EG HCF presented amendments to RfG legal text regarding certification of PGMs. ENTSOE reacted to these proposals, rejecting such addition to the legal text due to the level of detail and for being out of the RfG context. After the discussion:

- “ENTSO-E is fully open to discuss any amendment proposal, and there will be a chance for that in the coming months, as the public consultation gets closer. He shares that given the long period of time that it required to work on the report, and yet with no amendment proposal, he expects that it will be quite challenging to reach an alignment by the end of the summer. Some content regarding the certification was already submitted in September, and although it is encouraged to continue the discussions in the coming months, the timing for the preparation of a legal proposal that would be agreeable to everyone is challenging.”
- “ENTSO-E to organize two meetings with EG HCF and ACER (as observer) to review the legal text proposal of EG HCF and to reach an alignment.”

2. Discussions EG HCF - ENTSOE

- **Meeting 5th July:**

- ENTSOE identified the topics that could be included in a high level wording in RfG-2 regarding certification:
 1. Certificates to show compliance need to be defined in the compliance scheme defined by the RSO
 2. RSOs may accept EqCs that were issued by certifiers within the EU accreditation environment as long as they are equally or more stringent
 3. Family usage (PGU and components)... RSO may accept certificates from a family to the extent defined in the compliance scheme defined by the RSO

Other topics are considered by ENTSOE to be out of the scope of RfG and it is still considered that to provide guidance to RSOs on the certification topic, the best legal document is the IGD.

Based on this discussion, EG HCF would work on a new proposal.

- **Meeting 8th September:**

- EG HCF 30th/8 sent a new proposal to ENTSOE. ENTSOE acknowledges the effort in reducing the level of detail compared to the initial proposal.
- ENTSOE drafted a proposal of New Article XX “Common Provisions on Equipment Certificates” to be included in Chapter 1 (Compliance Monitoring) under Title IV (Compliance) + New (necessary) definitions, shared during the meeting.
- ENTSOE requests HCF to not make more extended the proposal of Article XX and to fix any inaccuracy detected in the wording, regarding the definition of compliance scheme and specific topics related to certification process.
- Comments to ENTSOE proposal provided by EG HCF on 18th/9.
- **Current situation: Comments under discussion in ENTSOE.**