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Via email: Maria-Eugenia.Leo-Martin-Casallo@ec.europa.eu

### **Translation error in Commission Regulation (EU) 2016/631 – Network Code RfG**

Dear Mrs. Leoz Martin-Casallo,

We would like to point out that a translation error has occurred while transferring the network code „Requirements for Generators“ (Regulation 2016/631) from the English working language used during comitology into the German version. Article 13(6) requires in English: "The power-generating module shall be equipped with a **logic interface** (input port) in order to cease active power output within five seconds following an instruction being received at the input port. The relevant system operator shall have the right to specify requirements for equipment to make this facility operable remotely."

The following survey compares a selection of different language versions of Article 13(6) as published in the Official Journal of the European Union (EUR-lex):

DE: fernwirktechnische Schnittstelle (Eingangsport)

EN: logic interface (input port)

FR: interface logique (port d'entrée)

ES: interfaz lógica (puerto de entrada)

IT: interfaccia logica (porta d'ingresso)

PT: interface lógica (porta de entrada)

RO: interfață logică (port de intrare)

PL: interfejs logiczny (port wejściowy)

NL: logische interface (ingangspoort)

DA: logisk grænseflade (inputport)

SK: logikgränssnitt (en ingång)

EL: λογική διεπαφή (πύλη εισόδου)

GR: logike diepafē (pyle eisódoy)

The "logic interface" (DE: logische Schnittstelle) has falsely been translated as "fernwirktechnische Schnittstelle" (EN: telecontrol interface). These are two different things. Telecontrol (DE: Fernwirktechnik) is a two-way remote control with high-performance communication channels, data models and protocols. A SCADA box is a good example of "Fernwirktechnik", which is a communication device worth several thousands of Euros.

The purpose of the "logic interface" was not to have a full chain of communication and command, but to provide a simple switch contact (boolean logic 1 bit: On/Off) as minimum technical requirement. This switch contact may be triggered by a communication device, if needed. Communication devices range today from ripple control to GSM/LTE modems, digital broadcast & private mobile radio, smart meter gateways, etc. - who knows what kind of communication is available at considerable costs, low latency, proper functionality and hardened IT security the day after tomorrow? The definition of the communication channel was therefore not included in the requirement, but the logic interface can be made operable remotely under the principle of proportionality. The only responsibility of this switch contact is to shut down the generating plant in an orderly manner after being triggered.

A telecontrol interface includes the physical signal receiver, protocol translator, etc. The current legal situation in Germany according to the Renewable-Energy-Sources Act (§ 9 EEG) is that generating plants have to be equipped with a technical device that enables the network operator to reduce the feed-in power by remote control, if the generator is larger than 100 kW – in the case of PV plants the threshold is only 30 kW. As the RES Act has been revised in 2017 without changing this threshold we strongly assume that the value of 30 kW resp. 100 kW is still appropriate. Again, a logic interface (input port) is just a switch contact to be triggered by whatever communication device is available as a retrofit in case there is the need to shut down even the smallest generators of the spectrum, e.g. PV microinverters for balconies, fuel cells of a few hundred watt, etc.

Unfortunately, the term “fernwirktechnische Schnittstelle” from the DE version of the NC RfG has already been copy-and-pasted into the draft of VDE-AR-N 4105:2018 (Generators connected to the low-voltage distribution network – Technical requirements for the connection to and parallel operation with low-voltage distribution networks).

The term "fernwirktechnische Schnittstelle" = "telecontrol interface" is simply wrong and leads the reader in a very costly direction. The correct German translation is "logische Schnittstelle (Eingangsport)". Please have this issue resolved in order to improve legal certainty and prevent unnecessary stranded investments for “telecontrol interfaces” where just “logic interfaces” are required if the translation would be corrected.

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