

# SMA Response to Elia Consultation on proposals for a modified federal grid code and general requirements RfG

## 1. Response to Document “Proposal for NC RfG Requirements of General Application”

Section	Comment	Proposal
3.1.6	Logical Interface should be understood in the way that it can be realized via a communication interface, not necessarily a separate binary input connector.	Add note: This logical interface can be realized using a PGM communication interface.
4.1.1	It should be allowed, that a limitation of active power is activated e.t. by controlling loads or by charging a storage device (Requirement at the PCC, not necessarily at PGM Unit)	The Requirement for limiting the Power may be realized at the PGM or at the PCC. The active power to be limited is the power fed into the grid.
4.4.3	Zero-sequence current can only be provided by special power electronics topologies and transformer vector groups and should not generally be stipulated. Positive and negative sequence current is sufficient and in line with other gridcodes as in the new EN50549 and German VDE AR-N-4120 and upcoming AR-N-4110	Delete requirement for zero-sequence-current contribution:  For the reliable detection of asymmetric faults, the PPM unit shall contribute to the fault with positive <b>and</b> negative <del>and zero</del> -sequence current.

## 2. Response to Document “Proposal for Storage Connection Requirements”

Section	Comment	Proposal
4.1.5	Logical Interface should be understood in the way that it can be realized via a communication interface, not necessarily a separate binary input connector.	Add note: This logical interface can be realized using a PGM communication interface.
4.1.7	In order to compensate fluctuation of local loads (as used in Energy Management Systems), high rates of change of active power may be necessary. In these cases, high rates shall be allowed.	Control systems that minimize local load consumption, are exempted.
4.2	If a communication interface exists, it can be used for charging / discharging requests.	Add sentence: If a real time communication interface exists, it can be used for this purpose.