

3.3 RfG implementation monitoring

- Questionnaire concerning (inter alia) certification and verification programs was circulated to all NRAs in January
 - Preliminary screening of answers from 21 Member States
 - Screening the answers revealed some of the questions were misinterpreted. Clarifications are required mainly on:
 - application of rules applying to new PGMs and possibility to grant derogation
 - Presence of authorised certifiers issuing equipment certificates (and possible alternatives)
 - Presence of certification and validation programs
 - ACER invited Bernhard Schowe-von der Brelie to a meeting with NRAs to provide more insights concerning the verification and certification programs (6th June)

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- Beyond the RfG IMR scope: Identifying potential risks and proposing mitigating actions associated to PGMs connecting after RfG EiF
- Background:
 - Stakeholders' letter to EC and ACER (March 14th 2019) and issues raised at previous GC ESC meetings highlighted:
 - the lack or late approval of non-exhausting requirements and of verification and certification programs (leading inter alia to lack of equipment certificates),
 - increased costs (due to possible retrofitting processes) and delays for existing projects, and
 - potential termination of existing/future project.

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- Actions: ACER prepared a note recommending NRAs to look into the RfG implementation issues and to adopt relevant mitigation actions. In particular, ACER recommends NRAs to:
 - communicate the identified issues via the SOGC TF,
 - coordinate at the SOGC TF level the mitigation actions, e.g. aiming at harmonised solutions when evaluating the types and duration of derogation. Each NRA is suggested to:
 - Act, as per Art. 4(2) of the RfG, within given powers concerning the determination of *existing vs new* PGMs *, and
 - explore, as per Art. 60 of the RfG, the possibility of granting PGF owners and/or relevant SOs time-limited or indefinite derogations from one or more provisions listed in the RfG.

*
e.g. Germany will consider as existing PGMs put into operation until June 30th 2020
(http://www.gesetze-im-internet.de/enwg_2005/__118.html)