

Equigy reply to the consultation

Article 25: Data standardization on CU level

Equigy agrees that the processes for prequalification of standard balancing products should be harmonised at EU level, and that a proposal should be developed by all TSOs. In order to facilitate the rollout of small, distributed resources, Equigy strongly believes that standardised data exchange for balancing products should be defined at EU level as well. Therefore, Equigy recommends that the NC DR should also deal with data exchange, and not only with prequalification data. This is especially relevant where the data exchange touches upon requirements on CU level, where the network code leaves a lot of room for national implementation of master data registration, controllability and baselining/validation. Whilst there should be room for different national process implementations according to national circumstances, there is a need to define at least a minimum set of European data requirements imposed on CU's as an input to OEM's with a European or global footprint to make their products "flex ready". On top of that, the NC should ensure that data points to be measured and stored should be kept to a minimum, in order to minimise costs incurred for managing data.

These comments also apply to Article 33 as well.

Article 40: Principles and requirements for data exchange in the prequalification phase

Equigy welcomes the establishment of a common front door at MS level, since this leads to simplification for the SPs. However, the flexibility register at MS level should also consist of one single flexibility register platform, allowing for one single interface and one single API for accessing the register. The establishment of one single interface, as opposed to multiple interfaces with multiple APIs, would harmonise the procedures for SPs to register their asset at MS level. Furthermore, in order to facilitate the creation of a harmonised single front door at EU level at a later stage, Equigy recommends to define a minimum set of data points describing flexible assets that every MS shall adopt when setting up their national flexibility registers.

Article 34: Requirements for product prequalification

Equigy welcomes the simplification proposed in cases where SPG or SPU consist only of small CUs or standardized devices as controllable units. However, Equigy believes that the proposed simplifications should be more ambitious when small controllable units, such as EVs or heat pumps, are all identical and produced in large numbers at industrial scale. Equigy recommends the introduction of the "type approved" or "grid readiness" concept. After testing and proving that a sample of assets is capable of providing certain services and measurement accuracy, then the NC should establish that all assets identical to that one, should be deemed as "type approved" or "flex ready" for the provision of certain services, without the need for further tests or ex-ante product prequalification. Also, Equigy believes that it should be considered for smaller controllable units (KW-level) to become certified with less stringent requirements than those applying for larger units, for instance in the area of metering, in order to ensure a more cost effective participation for such smaller units. In addition, a threshold for small vs large units should be defined at EU-level.