

Equigy response to the consultation

The articles to which Equigy commented regarding the consultation carried out on the proposal of the EU DSO Entity's & ENTSO-E's and on the ACER's revisions are reported below:

NC DR document

Article 28 - Requirements and process for product prequalification for service providing units or service providing groups

Comment

The draft NC DR proposes that, when the potential SPU or SPG exclusively consists of small controllable units that are identical to controllable units being part of other SPUs or SPGs previously prequalified by any SP, the procuring system operators shall simplify the product prequalification process. Furthermore, if an activation test is required, it shall be performed on a limited number of controllable units. However, Equigy believes that, in these cases, neither the prequalification procedures nor the tests should be required. To this end, Equigy recommends the introduction of the "grid-ready CU": after testing and demonstrating that a specific CU is capable of providing certain system services, then the NC should establish that all assets identical to that one, should be eligible 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.

Article 34 - Principles for Governance, Accessibility and Interoperability

Comment

Equigy welcomes the establishment of a single flexibility information system which simplifies processes, including data exchanges. Such a system, which provides a single and common access point with a nationally harmonised GUI and API, would make it easier for SPs to access the markets. The establishment of one single interface, as opposed to multiple interfaces with multiple APIs, would indeed harmonise the procedures for SPs to register their asset at MS level. However, Equigy sees a risk in decentralizing the flexibility information system through multiple SP modules and multiple CU modules, leading to ICT fragmentation and to the proliferation of different platforms at national level. Such decentralised system could pose some challenges to the harmonisation and simplification of processes (e.g. incompatibility between modules, data silos, higher maintenance costs, etc.). Therefore, for countries where no centralized solution has been developed yet, Equigy believes that a decentralised approach could be a viable alternative for a national centralized approach, but only if unified access via a single interface is guaranteed for market participants. Furthermore, in order to facilitate the creation of a harmonised single and common interface at EU level at a later stage, Equigy recommends defining a minimum set of data points describing flexible assets that every MS shall adopt when setting up their national flexibility information systems.

EB Regulation

Article 25 - Requirements for standard products

Comment

Equigy highlights that, beside the implementation of standard product, the new Network Code should accelerate the rollout of standards for data exchange, as an opportunity to further reduce transaction costs

and increase participation of small-distributed resources to the energy markets. To this end, the NC DR should mandate a reasonable timeline for implementing existing standards for the data exchange between BSPs and TSOs. These standards are already used for the TSO-TSO communication in the context of the EU Balancing Platforms but are not yet widely used for TSO-BSP data exchange. Equigy recommends that ENTSO-E shall define, publish and maintain a list of European standards based on ETSI-CEN-CENELEC set of standards relevant for the data exchanges used in the interactions between TSOs and BSPs regarding standard balancing products excluding operational real-time data exchange. Furthermore, within a reasonable timeframe following the publication of the list of European standards for standard balancing products, each TSO and BSP shall implement at least one of these standards. This implementation may be in addition to existing data exchange interfaces.