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Public consultation - Framework Guideline on Demand Response

Fields marked with * are mandatory.

Introduction

Context

In accordance with Article 59(3) of the Electricity Regulation, Commission Implementing Decision (EU) 2020/1479 established a priority list for the development of network codes and guidelines for electricity for the period from 2020 to 2023. Article 1 of this Decision provides for the development of harmonised rules regarding demand side flexibility, including rules on aggregation, energy storage and demand curtailment rules. Subsequently to this decision, the European Commission invited ACER by letter of 21 October 2021, to launch a scoping exercise for the development of new rules based on Article 59(1)(e) of the Electricity Regulation. ACER´s results of the scoping exercise were sent to the European Commission on 1 February 2022.

In accordance with Article 59(4) of the Electricity Regulation, the European Commission invited, by letter of 1 June 2022, ACER to draft Framework Guidelines for new rules on demand response. This draft Framework Guideline is a response to this letter.
This Framework Guideline need to be subject to a public consultation for two months pursuant to Article 59 (5) of the Electricity Regulation and subsequently submitted to the European Commission in accordance with Article 59(6) of the Electricity Regulation.

The purpose of this survey is to conduct this public consultation by inviting stakeholders to express their level of agreement (through the likert scale) with consulting on the provided draft Framework Guideline on Demand Response (FG). One response (between 'strongly agree' and 'strongly disagree') is expected for each paragraph of the document allowing also for the option of 'no opinion'.

There is room for providing comments and potential alternative draft proposals on each paragraph of the draft FG at the end. Please complete this survey by following the numbering of draft FG paragraphs.

Replies to this consultation should be submitted by Tuesday 2 August 2022 23:59 hrs (CET).

Below you may find for your convenience the draft FG and an Excel document that can facilitate your company's internal coordination to complete this survey.

Draft Framework Guideline on Demand Response:

DR-FG_for_public_consultation.pdf

Excel document for internal coordination:

PC-DR-FG_Template_for_internal_coordination.xlsx

Background documents

Legal acts

Regulation (EU) 2019/942 of 5 June 2019 establishing a European Union Agency for the Cooperation of Energy Regulators.

Regulation (EU) 2019/943 of 5 June 2019 on the internal market for electricity.

Relevant documents

Roadmap on the Evolution of the Regulatory Framework for Distributed Flexibility.

ASSET Study on Regulatory priorities for enabling Demand Side Flexibility

CEER Paper on DSO Procedures of Procurement of Flexibility

TSO–DSO Report – An integrated approach to active system management

Data protection and confidentiality

ACER will process personal data of the respondents in accordance with Regulation (EU) 2018/1725, taking into account that this processing is necessary for performing ACER's consultation tasks.
More information on data protection is available on ACER's website.

ACER will not publish personal data.

Following this consultation, ACER will make public:

- the number of responses received;
- company names, except those with a valid reason for not having their company name disclosed;
- all non-confidential responses; and
- ACER's evaluation of responses.

You may request that **(1)** the name of the company you are representing and/or **(2)** information provided in your response is treated as confidential. To this aim, you need to explicitly indicate whether your answers contain confidential information, and also provide a valid reason if you want that the name of your company remains confidential.

You will be asked these questions at the end of the survey.

Respondent's data

* Name and surname

This information will not be published.

Chiel Bakker

* Email

This information will not be published.

cb@vemw.nl

* Company

IFIEC

* Country of the company's seat

- ○ Austria
- ◉ Belgium
- ○ Bulgaria
- ○ Croatia
- ○ Cyprus
- ○ Czechia
- ○ Denmark
- ○ Estonia
- ○ Finland
- ○ France
- ○ Germany
- ○ Greece
- ○ Hungary
- ○ Ireland
- ○ Italy
- ○ Latvia
- ○ Lithuania
- ○ Luxembourg
- ○ Malta
- ○ Netherlands
- ○ Norway
- ○ Poland
- ○ Portugal
- ○ Romania
- ○ Slovak Republic
- ○ Slovenia
- ○ Spain
- ○ Sweden
- ○ Other

* Countries where your company is active

- [x] All EU Member states
- [ ] Austria
- [ ] Belgium
- [ ] Bulgaria
- [ ] Croatia
- [ ] Cyprus
- [ ] Czechia
- [ ] Denmark
- [ ] Estonia
- [ ] Finland
- [ ] France
- [ ] Germany
- [ ] Greece
- [ ] Hungary
- [ ] Ireland
- [ ] Italy
- [ ] Latvia
- [ ] Lithuania
- [ ] Luxembourg
- [ ] Malta
- [ ] Netherlands
- [ ] Norway
- [ ] Poland
- [ ] Portugal
- [ ] Romania
- [ ] Slovak Republic
- [ ] Slovenia
- [ ] Spain
- [ ] Sweden
- [ ] Other

* Activity

- ( ) Aggregator (or association)
- ( ) Generator (or association)
- ( ) Energy supplier (or association)
- ( ) Trader (or association)
- ( ) Utility (or association)
- ( ) Transmission network operator (or association)
- ( ) Distribution network operator (or association)
- ( ) Market operator (or association)
- ( ) Regulatory authority
- (•) End-user (or association)
- ( ) Other market participant

Please specify if needed

1. General Provisions

What is your general opinion on the drafted proposal of the following paragraphs?

Opinion table

Please note that the survey does not cover all paragraphs, we have excluded those that we considered trivial and not relevant to the consultation.

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* (2)	○	○	◉	○	○	○
* (3)	○	○	◉	○	○	○
* (4)	○	○	◉	○	○	○
* (12)	○	○	◉	○	○	○
* (15)	○	○	○	○	○	◉
* (16)	○	○	◉	○	○	○
* (17)	○	○	◉	○	○	○

In case of disagreement on proposed paragraphs, please write alternative draft proposals and reasonings in the table below (optional).

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

Comment table

	Comment	Alternative draft proposal
(2)	IFIEC supports changing legislation to further reduce the hindrances for unlocking demand side response. Simultaneously, it should be noted that the creation of a new netcode instead of amending existing codes, risks creating incongruities and incompatibilities where the envisaged code overlaps with existing network codes. IFIEC stresses that particular care should be taken to avoid such incongruities. Furthermore, care should be taken to not create overly restrictive requirements for the supply of demand side response. Strict specifications (duration of interruption, speed of response, a threshold quantity or frequency of involvement, etc.) will reduce participation. This will in turn hinder aggregators in reaching efficient outcomes. As demand side flexibility is further developed, adjusting and finetuning legislation will be necessary to reach optimal outcomes at the lowest system cost. In that light, IFIEC views this consultation and the envisaged framework guideline as the start of a process.	
(3)	IFIEC stresses in general that the DSR netcode risks overlapping with existing energy codes, such as the NC DCC. Coordination between the envisaged DSR code and existing legislation must be ensured, to prevent contradictory obligations and rights for end-users.	

(4)	IFIEC stresses that in different member states, different roles exist for facilitating the supply of flexibility. Balancing responsible parties, balancing service providers, congestion service providers to name a few. Adequate access to relevant service providers is a prerequisite for participating in the supplying of flexibility. Simultaneously, from article 3(c) of the Electricity Regulation, it follows that market rules shall facilitate more flexible demand. Furthermore, paragraph 4 states "that (...) the Framework Guideline aims at removing all undue barriers for the participation of these resources in all wholesale electricity markets, (...)". Paragraph 103 may hinder this through undue harmonisation, thereby artifically restricting supply.	
(12)	'The administrative costs of ex-post verification can form a hindrance for the participation of smaller end users. IFIEC therefore stresses again the need for adequate and cost-effective service providers to enable unlocking the full DSR potential in each member state. Furthermore, the definition of 'baseline' should be further clarified. Additionally, no explicit definition of congestion management is provided, while the processes for and characteristics of congestion management on interconnectors or within bidding zones are very different. Furthermore, congestion management to ensure minimal economic damage during a system expansion must be distinguished from congestion management as an alternative to system expansion.	'baseline' means a counterfactual programme of what the SP's BRP allocated volume would be, expressed in MW and at the lowest feasible granularity, in the absence of the activation for the provision of the respective service. 'congestion management' means a system through which the relevant system operator ensures optimal usage of scarce transmission or distribution capacity by temporarily buying back allocated transmission rights to bridge a system expansion meant to alleviate congestion.
(15)		
(16)	A typing error	'(…) for the sake of clarity (…)'
(17)	It is left unclear whether the BSP will be the same party providing the congestion services, or whether a new entity such as a congestion service provider (CSP) must be set up for this. IFIEC emphasizes that clarity on this is valuable, as it otherwise risks reducing the accessibility of DSR to the relevant systerm operator for providing congestion services.	

2. General requirements for market access

What is your general opinion on the drafted proposal of the following paragraphs?

Opinion table

Please note that the survey does not cover all paragraphs, we have excluded those that we considered trivial and not relevant to the consultation.

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* (18)	○	○	◉	○	○	○
* (19)	○	○	○	○	○	◉
* (20)	○	◉	○	○	○	○
* (21)	○	○	○	◉	○	○
* (22)	○	○	○	○	○	◉
* (23)	○	○	○	○	○	◉
* (24)	○	○	◉	○	○	○
* (25)	○	○	○	○	○	◉
* (26)	○	○	○	○	○	◉
* (27)	○	◉	○	○	○	○
* (28)	○	○	○	○	○	◉
* (29)	○	○	○	○	○	◉
* (30)	○	○	○	○	○	◉
* (31)	○	○	○	○	○	◉
* (32)	○	○	○	○	○	◉
* (33)	○	○	○	○	○	◉
* (34)	○	○	○	○	○	◉
* (36)	○	○	○	○	○	◉
* (37)	○	○	◉	○	○	○
* (38)	○	○	○	○	○	◉

In case of disagreement on proposed paragraphs, please write alternative draft proposals and reasonings in the table below (optional).

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Comment table

	Comment	Alternative draft proposal
(18)	IFIEC stresses in general that the DSR netcode risks overlapping with existing energy codes, such as the NC DCC. Coordination between the envisaged DSR code and existing legislation must be ensured, to prevent contradictory obligations and rights for end-users.	
(19)		
(20)	The data exchange mentioned does not merely include the BSP. It is crucial that BRP's are also informed adequately, so as to avoid the accidental creation of imbalances for which end users pay the price.	"(…) including the data that should be exchanged between the TSO, the BSP, the BRP and other relevant service providers"
(21)	It is important that, to enable an efficient flexibility market and to ensure efficient costs, aggregation is technically facilitated by the relevant system operator in a timely manner. End users should be protected against the inefficient costs caused by a prolonged inability of the system operator to facilitate aggregated supply of flexibility services, e.g. through a deadline either harmonised or set a at a member-state level for the implementation of the required IT-infrastructure.	
(22)		
(23)		
(24)	It is unclear why in paragraph 23, a requirement is set for an exhaustive list of aggregation models and why only the number of BRPs is relevant. Multiple BSPs or other service providers may be active for each connection point as well. Furthermore, it is important that any imbalances are not double-counted so as to excessively punish imbalances, but that the price paid is linked clearly to the system costs caused.	
(25)		
(26)		

(27)	The method for verifying the delivery of congestion services is best set at an EU-level, or at least be provided a framework for at an EU-level. By allowing system operators to freely implement different methods at a national level, combined with cross-border exchange of services, the risk exists that the regulatory framework in one member state unduly affects the balancing of the system in another. Furthermore, the costs for end users to enable the systems set up for establishing the baseline may vary wildly between member states, which is undesirable in itself. If a more cost-effective system is possible, end users should have the option to demand it. In particuar when faced with costs they cannot avoid in light of congestion management.	
(28)		
(29)		
(30)		
(31)		
(32)		
(33)		
(34)		
(36)		
(37)	IFIEC stresses that a very clear process must exist through which the possibility of market participation is explored. A lack of awareness in the market of the need for storage, for example, must not be the reason for a TSO to participate in storage themselves. All hurdles to market participation must be addressed before TSO participation can be considered. In particular, adequate and timely information on the need for storage facilities at specific locations and for specific timeframes is crucial, and may solve a significant portion of the need for storage. Simultaneously, it should be noted that storage unit ownership by a closed distribution system operator (CDSO) may be desirable due to the specific safety characteristics of industrial grids.	

(38)		

3. Prequalification

What is your general opinion on the drafted proposal of the following paragraphs?

Opinion table

Please note that the survey does not cover all paragraphs, we have excluded those that we considered trivial and not relevant to the consultation.

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* (39)	○	●	○	○	○	○
* (40)	○	○	●	○	○	○
* (41)	○	○	○	●	○	○
* (42)	○	○	●	○	○	○
* (43)	○	○	●	○	○	○
* (44)	○	○	○	○	○	●
* (45)	○	○	○	●	○	○
* (46)	○	○	●	○	○	○
* (47)	○	○	○	○	○	●
* (48)	○	○	○	○	○	●
* (49)	○	○	●	○	○	○
* (50)	○	○	●	○	○	○

In case of disagreement on proposed paragraphs, please write alternative draft proposals and reasonings in the table below (optional).

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Comment table

	Comment	Alternative draft proposal
(39)	The draft framework guideline makes note of both conditional or long term grid prequalificationand dynamic or short term grid prequalification. IFIEC advocates that the prequalification procedures be kept as simple as possible: the role of service provider has issues with adequate participants. Considering the obligations of congestion management and the urgent need for system flexibility, it is crucial that service providers are present.	
(40)	IFIEC emphatically supports the phrasing "striving to minimise and standardise the different steps when possible.". In certain member states, end users are obligated to participate in congestion management but nearly no service providers exist to facilitate this. A harmonised requirement for simplicity may alleviate these concerns and lower total system costs.	
(41)	IFIEC supports the inclusion in the table of equivalences or market roles, to reduce the difficulty of service providers in facilitating congestion services.	
(42)	The sentence "The new rules shall avoid that any change in a prequalified reserve providing unit or group always requires to overcome a new prequalification process or test" seems grammatically incoherent. The same applies to the phrase "that will require to overcome"	The new rules shall avoid that any change in a prequalified reserve providing unit or group always requires a new prequalification process or test. The new rules shall define a threshold in the technical requirements or in the capacity or volume of the reserve providing unit or group that will require overcoming a new prequalification process or test.
(43)	Further clarification is desirable regarding "After the qualification of the SP, the contracting SO shall perform an ex-post verification based on the service delivery and some verification criteria." The precise contents of the verification criteria is important for end users to not unjustly be held liable for imbalances or non-delivery. Furthermore, there is a grammatical error: "The new rules shall guarantee that if any ex-post verification test is required by the contracting SO, it will shall bear"	

(44)		
(45)	IFIEC agrees explicitly with the proposed harmonisation in the statement: "They shall define a process and timeline where all SOs within each Member State propose guidelines to harmonise the IT and communication requirements in the prequalification processes.". IFIEC supports harmonisation in the sense that IT and communication requirements must not be allowed to hamper the supplying of flexibility.	
(46)		
(47)		
(48)		
(49)	IFIEC stresses in general that the DSR netcode risks overlapping with existing energy codes, such as the NC DCC. Coordination between the envisaged DSR code and existing legislation must be ensured, to prevent contradictory obligations and rights for end-users.	
(50)	Appears to contain a grammatical error	"(…) will be agreed among all SOs within a Member State."

4. Data exchange and SOs coordination

What is your general opinion on the drafted proposal of the following paragraphs?

Opinion table

Please note that the survey does not cover all paragraphs, we have excluded those that we considered trivial and not relevant to the consultation.

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* (51)	○	○	○	◉	○	○
* (52)	○	○	◉	○	○	○
* (53)	○	○	○	○	○	◉
* (54)	◉	○	○	○	○	○
* (55)	○	○	○	○	○	◉
* (56)	○	○	◉	○	○	○
* (57)	○	○	○	○	○	◉
* (58)	○	○	◉	○	○	○
* (59)	○	○	○	○	○	◉
* (60)	○	○	○	○	○	◉
* (61)	○	○	○	○	○	◉
* (62)	○	○	○	○	○	◉
* (63)	○	○	○	○	○	◉
* (64)	○	○	○	○	○	◉
* (65)	○	○	○	○	○	◉
* (66)	○	○	○	○	○	◉
* (67)	○	○	○	○	○	◉
* (68)	○	○	○	○	○	◉
* (69)	○	○	○	○	○	◉
* (70)	○	○	○	○	○	◉
* (71)	○	○	○	○	○	◉
* (72)	○	○	○	○	○	◉
* (73)	○	○	○	○	○	◉
* (74)	○	○	○	○	○	◉

* (75)	○	○	○	○	○	◉
* (76)	○	○	○	○	○	◉
* (77)	○	○	○	○	○	◉
* (78)	○	○	◉	○	○	○
* (79)	○	◉	○	○	○	○
* (80)	○	○	○	○	○	◉
* (81)	○	○	○	○	○	◉
* (82)	○	○	○	○	○	◉
* (83)	○	○	◉	○	○	○

In case of disagreement on proposed paragraphs, please write alternative draft proposals and reasonings in the table below (optional).

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

Comment table

	Comment	Alternative draft proposal
(51)	IFIEC explicitly supports the proposed six month limit for the NRA to accept, reject or amend the proposal.	
(52)	It would be helpful if it were clarified under which criteria an SO may be said to be unduly distorting the market.	
(53)		
(54)	The bids are made for different products, under different circumstances and for different reasons. Congestion product bids may not always be made voluntarily and as such cannot be treated as equal to balancing service bids. At the same time, flexibility will generally have a higher value in the day-ahead and intraday markets. As such, flexibility should be allowed to be used there where it has the highest value.	
(55)		
(56)	Grammatical error	Further details may be set nationally. The new rules shall provide that the NRA is responsible for ensuring compliance with these requirements by operators of local markets for SO services
(57)		
(58)	IFIEC stresses in general that the DSR netcode risks overlapping with existing energy codes, such as the NC DCC. Coordination between the envisaged DSR code and existing legislation must be ensured, to prevent contradictory obligations and rights for end-users.	
(59)		
(60)		
(61)		
(62)		

(63)		
(64)		
(65)		
(66)		
(67)		
(68)		
(69)		
(70)		
(71)		
(72)		
(73)		
(74)		
(75)		
(76)		
(77)		
(78)	It may be helpful to define interoperability with specific platforms/goals.	
(79)	Under section i), the size and location of congestion is based on input of SGUs. Firstly, SGUs are not defined strictly enough for this to immediately useful. Furthermore, assessing congestions based on the input of SGU scheduled data exchange is both too big and too small: grid users with a connection of 20 MW or bigger are not the only ones where congestion occurs. In fact, the majority of within-bidding zone congestions occur at far smaller, DSO level. So depending on the definition used of SGU, this is too big. Simultaneously, the input here is too small, as basing congestions on information received by connected parties is only one input. At a certain level (+/- 20 MW), it cannot be made accurately enough for a system operator to trust the safety of its system to the accuracy of such prognoses.	
(80)		
(81)		

(82)		
(83)	More importantly, consumers must have clarity on who they can hold responsible. This must be included in this list so that consumers have legal security.	

5. Congestion management

What is your general opinion on the drafted proposal of the following paragraphs?

Opinion table

Please note that the survey does not cover all paragraphs, we have excluded those that we considered trivial and not relevant to the consultation.

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* (84)	○	●	○	○	○	○
* (85)	○	○	●	○	○	○
* (86)	○	○	○	○	○	●
* (87)	○	○	○	○	○	●
* (88)	○	○	○	○	○	●
* (89)	○	○	●	○	○	○
* (90)	○	○	●	○	○	○
* (91)	○	○	○	○	○	●
* (92)	○	●	○	○	○	○
* (93)	○	○	○	○	○	●
* (94)	○	○	○	○	○	●
* (95)	○	○	○	○	○	●
* (96)	○	○	○	○	○	●
* (97)	○	○	●	○	○	○
* (98)	○	●	○	○	○	○
* (99)	○	○	○	○	○	●
* (100)	○	●	○	○	○	○
* (101)	○	○	●	○	○	○
* (103)	○	○	●	○	○	○
* (104)	○	○	○	○	○	●

In case of disagreement on proposed paragraphs, please write alternative draft proposals and reasonings in the table below (optional).

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

Comment table

	Comment	Alternative draft proposal
(84)	IFIEC warns that common attributes of CM-products should be used extremely tentatively. Congestion management is to some extent an obligation within a congestion area, at least in certain member states. Due to geographical features of congestion management, the supply is already extremely limited. IFIEC stresses that ACER should not unnecessarily constrict the supply of congestion services further. The argument for harmonising balancing products to allow for cross-trade border, does not apply to congestion management.	
(85)	IFIEC stresses in general that the DSR netcode risks overlapping with existing energy codes, such as the NC DCC. Coordination between the envisaged DSR code and existing legislation must be ensured, to prevent contradictory obligations and rights for end-users.	
(86)		
(87)		
(88)		
(89)	A SO cannot make a decision between the various options included here. A decision between these options are made in entirely different timeframes. Congestion management and grid investments are by definition the same choice (i.e. CM requires there to be a grid investment). This notwitstanding, IFIEC does support the principle that the choice made here should reflect the economic optimally outcome, but considering the different timeframes in which they take place, it may be hard to do so.	
(90)	ACER here claims that activation of congestion services should be market-based. It is unclear how this will be achieved in case of bilateral, long term contracts.	
(91)		

(92)	The rules for non-marketbased congestion management must also describe the manner in which an acceptable compensation is established. Furthermore, the statement is made that long-term contracts shall only be made in a market-based way. This appears to be an antithesis. It is unclear how long term contracts for congestion management can be anything other than non-market based, by definition of them coming about in bilateral meetings between one monopolistic system operator and one connected party.	
(93)		
(94)		
(95)		
(96)		
(97)	IFIEC agrees with the goal mentioned here of non-discriminatory procurement, but stresses that this requires some ability for grid users to check.	
(98)	This article clashes with the existing investment plans in specific member states. Express clarity on the overlap between network development plans as a European definition and investment plans as understood in individual member states would be useful. Furthermore, the statement is made "whether a project is based on grid expansion or use of congestion management." However, these are the same: congestion management shall always be carried out to bridge a grid expansion, by definition. If something else is intended here, it is necessary to expand the vocabulary used.	"It shall explain how the procurement of congestion management products was assessed by the DSO"
(99)		
(100)	IFIEC has extensive views on changes which ought to be made to network development plans, too expansive to fit in the given format of this consultation.	

(101)		"(…) some responses have not led to changes, why this choice has been made."
(103)	There seems to be a grammatical error in paragraph 102.	"(…)depending on the future knowledge level and acquired experience"
(104)		

6. Voltage control

What is your general opinion on the drafted proposal of the following paragraphs?

In case of disagreement on proposed paragraphs, please write alternative draft proposals and reasonings in the table below (optional).

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Opinion table

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	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* (105)	○	○	◉	○	○	○
* (106)	○	○	○	○	○	◉
* (107)	○	○	○	○	○	◉
* (108)	○	○	○	○	○	◉
* (109)	○	○	○	○	○	◉
* (110)	○	○	○	○	○	◉
* (111)	○	◉	○	○	○	○
* (112)	○	○	○	○	○	◉

Comment table

	Comment	Alternative draft proposal
(105)	IFIEC stresses in general that the DSR netcode risks overlapping with existing energy codes, such as the NC DCC. Coordination between the envisaged DSR code and existing legislation must be ensured, to prevent contradictory obligations and rights for end-users.	
(106)		
(107)		
(108)		
(109)		
(110)		
(111)	IFIEC stresses that non-market based alternatives to congestion management should only be applied as a measure of ensuring non-discrimination. Congestion management leading to economically inefficient outcomes is only foreseen as a risk in applying congestion management to renewable production, which may be installed far more rapidly and has a far lower actual cost due to congestion than consumers.	
(112)		

Questions on confidentiality

* Do your answers contain confidential information?

- ○ Yes
- ◉ No

* Do you want the name of your company to remain confidential?

In the evaluation of responses, ACER will not link responses to specific respondents or groups of respondents unless this is appropriate.

- ○ Yes
- ◉ No

Useful links

Roadmap on the Evolution of the Regulatory Framework for Distributed Flexibility (https://www.edsoforsmartgrids.eu/wp-content/uploads/210722_TSO-DSO-Task-Force-on-Distributed-Flexibility_proofread-FINAL-2.pdf)

ASSET Study on Regulatory priorities for enabling Demand Side Flexibility (https://asset-ec.eu/wp-content/uploads/2020/12/ASSET-EC-Regulatory-priorities-for-enabling-Demand-Side-Flexibility.Final_-1.pdf)

CEER Paper on DSO Procedures of Procurement of Flexibility (https://www.ceer.eu/documents/104400/-/-/f65ef568-dd7b-4f8c-d182-b04fc1656e58)

TSODSO Report An integrated approach to active system management (https://eepublicdownloads.entsoe.eu/clean-documents/Publications/Position papers and reports/TSO-DSO_ASM_2019_190416.pdf)

Background Documents

ACER scoping letter of 1 February 2022

European Commission letter of 1 June 2022

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