



**EWEA**  
THE EUROPEAN WIND ENERGY ASSOCIATION



# 3<sup>rd</sup> EBSAG meeting

## EWEA feedback to draft NC EB

**Ivan Pineda – Research Officer Electricity Grids and Market**

## Overall messages

EWEA recognises some progress in the formulation of the NC and stakeholder involvement, however

1. EWEA would like to see a more ambitious approach to the NC
  - Shorter regulatory approval (Art. 7)
  - Simplified cooperation process between TSOs (Art. 10, p2)
  - Greater incentives to TSOs to share/exchange reserves (Art 19 p.6, Art. 20)

## Overall messages

2. EWEA calls ENTSO-E for better and more concrete definition of key aspects of Balancing in the NC
  - Terms and conditions related to Balancing (Art. 13)
  - Products definition (Art. 14)
  - Roles and responsibilities of TSOs, BSP and BRPs
  - Procurement rules (Art. 21 & 22)

## Overall messages

3. EWEA calls to duly reflect non-discriminatory provisions for participation in the Balancing market
  - Take into account wind power intrinsic characteristics
  - Replace the term “intermittent” for “variable RES” throughout the text



# 1. A more ambitious approach to the NC

- Shorter regulatory approval (Art. 7)
  - Rationale?
  - Distinction between provisions to be approved by *all*, *each* and *case-by-case* NRAs
- Simplified cooperation process between TSOs (Art. 10, p.2)
- Greater incentives to exchange/share reserves (Art 19 p.6, Art.20)

## 2. Better and more concrete definition of key aspects of Balancing in the NC

- Terms and conditions related to Balancing (Art. 13)
  - NC to establish these terms and conditions
  - Today, it requires the development of a methodology for establishment of terms and conditions
  - How this process fits in the roadmap defined in the FG on EB?
- Products definition (Art. 5 & 6)
  - Requirements for Standard and Specific Products
    - Standard Products to follow rules of NC LFC&R (Art.5 (b) but Specific Products, not? (Art. 6)
    - Specific Products shall not create significant inefficiencies and distortions in markets...[] – What do TSOs consider as inefficiency and market distortion?

## **2. Better and more concrete definition of key aspects of Balancing in the NC**

- Procurement rules (Art. 21 & 22)
  - Initial proposal for the pricing method harmonisation (Art. 22, p.2) – NC to establish such methodology
  - Changes to the pricing method of Coordinated Balanced Areas in which a TSO does not participate? (Art. 22 p. 3)
  - Participation in the Balancing market not to be made an obligation (Art. 22, p.6)
- Roles and responsibilities
  - To include TSOs, BSPs and BRPs



### **3. Duly reflect non-discriminatory provisions for participation in the Balancing market**

- Participation of non pre-contracted BSPs and clarification of qualification procedures
- Firmness of products (Art. 17)
  - For RES, the firmness of certain products might not be possible, e.g. upward regulation. In order to fully allow participation of RES in the market, as per Art. 14, products would have to include a confidence level.
- Imbalance settlement
  - Prices to include true price of imbalance, i.e. no penalties





**EWEA**  
THE EUROPEAN WIND ENERGY ASSOCIATION

# Thank you very much for your attention

[www.ewea.org](http://www.ewea.org)  
g

RENEWABLE ENERGY  
HOUSE  
63-65 RUE D'ARLON  
B-1040 BRUSSELS

T: +32 2 546 1940  
F: +32 2 546 1944  
E: [ewea@ewea.org](mailto:ewea@ewea.org)