



Eurelectric response to ACER consultation on Framework Guidelines draft on Demand-response

MESC – September 2022

Our main remarks on the drafted Framework Guidelines

Eurelectric is globally in line with the proposed FG and with most of what has been included in the scope

- Still, the **name of the FG** does not properly reflect the proposed scope. **SO's owned storage** provisions, **DSO Network Development** plans provisions (art. 32) and **amendment to balancing** regulation **should be out of the scope**.
- We welcome the clarification, **simplification** and standardization to the extent possible, **of prequalification processes** (grid/product) as proposed in the FG
- Fully supports the **market-based approach** for congestion management and voltage control services

Some areas of attention/changes on market access

- Fully supports an all “SOs of a MS” approach as a starting point. Derogation granted by NRAs should remain possible
- The FG should be limited to main principles related to aggregation.
- It does not make sense to define the **baseline** at the level of the BRP. It needs to be **at the site or asset** (or even group of assets in case of residential consumers) level.

Need for further clarifications for the Framework Guidelines

- **Conditions for the use of certified sub meters** should be described
- The **roles of SOs regarding aggregation** should be clarified
- For the prequalification process, the new rule shall define the **technical criteria that will allow SOs to deviate from an ex-ante product prequalification** at service providing unit/group level as a prerequisite to provide the product.
- On market interaction, what is meant as a **locationally tagged bid** in DA, ID and Balancing ? Need for a dedicated workshop.

Regarding the next steps

- How will the consistency between existing NCs and new rules be ensured?
- What is the timeline for the next steps?
- Eurelectric would like to stress the need to include the whole spectrum of stakeholders in the power sector including wholesale and retail markets in the process for transparency purposes and to ensure an efficient consideration of consumer's need. **Eurelectric is a key representative of both Market and Retail stakeholders. We ask to be included in the formal draft committee.**

THANK YOU