

**Advice from the independent Advisory Council (iAC) to the ENTSO-E Secretariat  
on  
the ENTSO-E Consultation "Options for possible Market Design evolutions in 2030"**

**May, 20<sup>th</sup> 2021**

ENTSO-E is consulting on the topic of "Options for possible Market Design evolutions in 2030". Many of the fields and sub-topics are as such timely and important to address and we appreciate the open policy debate and its transparent process on a wide range of possible market designs for assessing different options for further improving the market design in the 2030 horizon and beyond.

With the aim to contribute to improved ENTSO-E stakeholder engagement in the future, the iAC wishes to convey the following reflections on this consultation with a focus on purpose, scope and process.

From the point of view of the iAC, ENTSO-E stakeholder engagement should give special focus on topics that are under the responsibility and authority of ENTSO-E or at least addressing the transmission networks. Practically, this means ENTSO-E should explicitly ask for or even suggest contributions regarding network and system operation wherever possible, and when ENTSO-E is interested in stakeholder views on related or unrelated market design topics beyond that, we advise ENTSO-E to more explicitly refer it to existing processes and/or decision-making bodies, e.g. the Market European Network Codes Stakeholder Committee (MESCC) and related European Stakeholder Groups and Committees, and operation of and further implementation of current NCs, GLs and Methodologies being secured by all TSOs and/or all NEMOs.

In relation to that we would like to remind ENTSO-E of the massive challenges laying ahead in implementing existing rules and regulations on the road to the completion of the Internal Energy Market by 2025. In our perspective, the priority lies in the implementation of these existing rules, and it raises some concerns from iAC members that it is not accounted for in the ENTSO-E consultation paper.

In practical terms the iAC would like to mention that the way the consultation is structured is such that it is overwhelming for many stakeholders with the sheer number of 64 questions timed at a particularly busy phase in the regulatory calendar. To develop a more constructive process we recommend ENTSO-E to moderate in-depth discussions on the specific questions/subtopics in designated focus or expert groups. ENTSO-E could then take the responses received from market stakeholders to the public consultation and initiate a high-level commenting on the given topic with such stakeholder inputs as a starting point.