

ERDF

Answer to ACER's public consultation on Framework Guidelines on Electricity Balancing

ERDF agrees with the objectives of the European Regulator to enhance operational security and to facilitate the integration of intermittent generation by new mechanisms.

ERDF also concurs with the objective to facilitate wider participation of demand response and renewable sources of energy to balancing mechanisms.

DSOs are pivotal in these mechanisms to facilitate the efficiency of the capacities that are mostly connected to the distribution networks, and with a growing contribution in the future.

To guarantee the safety of the system, it is important to assure that these balancing decentralised resources will not jeopardize the security of the distribution network. For this reason, ERDF, for instance, requires that technical conditions be met and accepted by the Balancing Service Provider.

In our view, DSOs have to play a role in the three phases of the balancing mechanism¹:

- In certification : in pre-qualification stage by checking the compatibility of the offer with its network, and by contributing to evaluate the service need and provision
- In the activation phase : by monitoring and supervising the consequences of the activation
- In the evaluation of balancing services and needs: by providing and processing data on both the service provided and the need for that service.

¹ ERDF agrees on the content of § 3.1 which requires the Balancing Service Provider to provide all necessary data and information needed by the DSO to evaluate the balancing service provided, at both the pre-qualification stage and real-time operation of the system.

ERDF agrees on the content of § 5.2 which requires the Balancing Responsible Party to provide all necessary data and information needed by the DSO to evaluate the balancing service needs, both for the planning and balance settlement purposes.