

Name	Fernando LASHERAS
Company	IBERDROLA
Address	Avenue de la Renaissance 12, 2 (Brussels)
Contact email	fernando.lasheras@iberdrola.es
Phone	+32 2 740 1919
Country	Spain, UK

IBERDROLA'S RESPONSE TO THE ACER DRAFT FRAMEWORK GUIDELINES ON ELECTRICITY BALANCING

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Iberdrola welcomes the publication of the ACER Draft Framework Guidelines on Electricity Balancing, and is pleased to take an active part in the public consultation providing its own vision.

A. General Comments

Iberdrola has contributed and agrees in general terms with Eurelectric's response to the ACER Draft Framework Guidelines on Electricity Balancing, but would like to add the following particular remarks:

- To create a level playing field in a common procurement platform if the products are procured in a different way (auctions, mandatory), we advocate for daily auctions for providing firm balancing reserves.
- Iberdrola advocates for imbalance settlement periods of maximum one hour. Cost-benefit analysis for imbalance settlement periods of 30 minutes and 15 minutes must be carried out to check if the reduction of balancing cost is higher than the cost of implementation (new data systems, changes in power control systems and new meters). National settlement periods could be shorter than the harmonized settlement period for European market, but not longer. A transition period should be allowed and it should take into account the current situation at a national level.
- The harmonization of imbalance settlement should be carried out. Iberdrola suggests launching a consultation to analyze if a single imbalance settlement price that is the marginal balancing price can be use as harmonized price and has

advantages over the use of dual prices. External consultancy and the opinion of experts could be useful to take a decision.