Response ID ANON-JBU7-6GTS-V

Submitted to DSO Entity & ENTSO-E Public consultation on Network Code for Demand Response
Submitted on 2023-11-10 10:27:55

Introduction

1 What is your name?

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Reason for the request of confidentiality:

Whereas

7 Your views on the "Whereas" section:

Your comment on the section::

This section is mature and complete. Two points should be carefully addressed.
1) In page 5 paragraph "(u) Congestion management is to a large extent ruled by Article 13 of Regulation (EU)
2019/943, and Member states have implemented options considered nationally suitable.
The applicability and implementation of the Regulation (EU) 2019/943 shall only be
affected where necessary to reach the goals of this Regulation." stipulates this requirement. It is crucial that the intervention is complete since this code should supersede any shortcomings of earlier codes.
2) In page 6 in paragraph ee, the term "switching on and off capacitors" is used which is technology related and not as general as required. It is better use the phrase "effective management of VAR control systems".

Your text proposal: :

In page 6 in paragraph ee, the term "switching on and off capacitors" is used which is technology related and not as general as required. It is better use the phrase "effective management of VAR control systems".

Article 1

8 Your views on Article 1:

Your comment on the article::

Art.1 (1) The scope of the Code (as it is mentioned in Article 1) does not include generation curtailment, even though it is mentioned in Art. 49, 1 (a) stating “(a) enable participation of any resources (production, consumption or storages). Curtailment of distributed generation is a relevant resource for demand

response, especially considering the growing share of PVs in distribution network and potential challenges related to voltage.

Your text proposal: :

Art. 1 (1) "This Regulation establishes a network code which lays down the requirements in relation to demand response, including rules on aggregation, energy storage, demand and generation curtailment rules, to contribute to market integration, non-discrimination, effective competition and the efficient functioning of the market pursuant to Article 59(1) of Regulation (EU) 2019/943".

Article 20

27 Your views on Article 20:

Your comment on the article::

Use of baseline approach as a universal method for validation of delivery for Demand Response products may have limitations, especially under certain conditions e.g. regular activation of given loads or gaming attempts. In general baseline development methods and application of these require more research and development to act as an efficient and reliable validation tool. The development will benefit from an open and harmonized approach.

Your text proposal: :

Article 29

36 Your views on Article 29:

Your comment on the article::

(The explanatory note 2) Limiting the min bid size to 1 MW limits involvement of smaller resources e.g. household customers, batteries or EV chargers, even in aggregated form. Allowing smaller bid size will create incentives for creation of more efficient aggregation tools, methods and operational procedures as well as extension of the potential resource base for demand response.

Your text proposal: :

Article 39

46 Your views on Article 39:

Your comment on the article::

Art. 39 (3) It is also important to mention that all data follow a similar structure so they will be interoperable

Your text proposal: :

Art.39 (3) "To avoid vendor and operator lock-ins, and to facilitate competition and innovation, data stored by flexibility register platforms that are not operated by systems operators shall be portable to other flexibility register platforms, particularly in cases where Member States or system operators decide to migrate towards new flexibility register platforms. Therefore, operators of such flexibility register platforms shall periodically demonstrate to the national regulatory authorities:
(a) that all data stored in the CU module and the SP module can be exported to a common European or national standard in a structured, machine-readable and well-documented format THAT WILL FOLLOW A PREDEFINED EUROPEAN COMMON ONTOLOGY AND METADATA STRUCTURE; and
(b) the existence of a well-defined procedure to export that data and suspend operation at a pre-defined point in time to facilitate potential migrations to other platforms".

Article 40

47 Your views on Article 40:

Your comment on the article::

To complement what was mentioned before.

Your text proposal: :

Art.40 (2) "If a flexibility register in a Member State consists of multiple flexibility register platforms, operators of flexibility register platform(s) shall closely cooperate to facilitate the proper interoperation of all flexibility register platform(s) in a Member State FOLLOWING WHAT PREVIOUSLY STATED IN ARTICLE 39, POINT 3".

Art. 40 (3) "EU DSO Entity and ENTSO-E shall co-operate with European standardisation organisations to adopt, maintain and further develop a European standard for data exchange with flexibility register platforms. All flexibility register platforms shall offer USER-FRIENDLY interfaces following that standard for data exchange with service providers, systems operators, market platforms and other relevant actors".

Article 48

55 Your views on Article 48:

Your comment on the article::

Art. 48 (1) The Code delegates development of the national markets to the System operators. This may potentially lead to fragmented national markets as it is mentioned in (8) of 2019/944 stating (quote) "The refined regulatory framework needs to contribute to overcoming the current problems of fragmented national markets which are still often determined by a high degree of regulatory interventions. " (end of the quote).

Your text proposal: :

Article 49

56 Your views on Article 49:

Your comment on the article::

Art. 49 (2) It is unclear if the same bid can have dual purpose i.e. be activated for balancing or congestion/voltage management or can it be pre-defined as one of the two or more different types of bids.

Your text proposal: :

Article 59

66 Your views on Article 59:

Your comment on the article::

Development of the congestion management products appears to be postponed and transferred to the individual Member States. A more harmonized Pan-European development will benefit the process and help avoiding segmentation of the national markets as it is required by 8) in Dir. 2019/944.

Your text proposal: :

Annex 1

95 Your views on Annex 1:

Your comment on the annex::

1) The product specification is geared towards pure energy-based or capacity-based products. There is also value in energy-limited capacity products, where the system operator can dispatch a certain amount of energy within a specified activation window. Such a product is advantageous given the finite energy capacity of many controllable units, and the fact that energy demand/supply can be better forecasted than instantaneous power flows. This product category does not seem to be covered by the current list of attributes, unless it is implied in the combination of a capacity product (MW) and the “minimum and maximum duration of delivery period”.

2) The rebound process associated with activation of services is currently under-specified. No limitations are stipulated on the magnitude of the rebound, which is implicitly assumed to have the same magnitude as the service delivered. This is not the case for thermal loads, for example. Moreover, when a product has an imprecisely specified rebound profile, this complicates the disambiguation of regular imbalances and those caused by the activation of a product. When member states specify products, there should be an option to regulate the rebound process more tightly, e.g., through automatic control or a specific profile. As an example: a service provider could indicate that they are able to recover after a 1MWh activation by a 1.1MWh rebound with a maximum power of 500kW between 4 and 10 hours after activation, to be specified by the TSO/DSO.

Your text proposal: :