

6.1 Baseline methods – DRESG comments and specific topics

DRESG

6 October 2026

DRESG input/feedback on some results in the first draft

- On 3rd Aug ACER sent a PPT to DRESG with a (confidential) set of results from the first draft for their input and feedback on:
 1. whether these results reflect your view on the implementation;
 2. whether anything is inaccurately represented or missing;
 3. whether there is anything relevant for us to further investigate.
- => 7 DRESG members have sent input/feedback: EUROPEX, All NEMO Committee, Eurelectric, ESMIG, SmartEn, EU DSO entity and ENTSO-E

GENERAL COMMENTS (Applicable to both AM and BM)

EUROPEX and All NEMO Committee

- The level of detail currently provided in the overview does not allow for the clear identification and assessment of individual aggregation models, baselining methods, or their specific implementations.

Eurelectric

- BMs grouping in archetypes: Provide clear explanations of each BM in practice and include application contexts for each model to improve transparency and avoid differing interpretations (similar comment by **ENTSO-E**) => We will try to include clear explanations but the application contexts in the literature may differ from the results shown in the report
- Selecting a BM when multiple available: In Finland, specify that the full freedom to choose any kind of BM under any circumstances is “subject to approval” => Checking with the NRA

SmartEn

- Missing information: Only NO shows 6 BMs, whereas SE, BE and FI all have the same methods available through the same platform (NODES) (In FI they are also available in a TSO congestion market); Surprising not to have cases with plausibility or consistency checks backed up by audit rights; DSO audit rights and access to meter data in the DSO markets in NO, SE, FI and BE => Checking with the NRAs. Some NRAs are not competent for DSO-related activities therefore they may not share information on baselining for DSO congestion management services.
- Missing information: As a preventive measure some DSO markets do not allow declarative baselines to be changed after a trade has been concluded => Only NO and FI reported declarative BMs for DSO CM. Not shown in the report because we took it for granted

SmartEn

- Puzzling answers in GR: Adjacent metering baselines being submitted days ahead of an FCR activation; Single baselines/aggregated metering points allowed in GR if they are submitted 15 days before the activation period, which must be shorter than 3 hours => *NRA has clarified that the baselines are not submitted by the BSP but calculated by the TSO*
- Clarify that the submission timing should represent the last moment at which the value can be changed and whether the activation signal refers to the time the SO sends a notification to the SP (which might even be day-ahead), or the time they expect physical delivery to start. => *Agree. We have clarified that “Submission timing before activation signal refers to the GCT by which the market participant must submit the baseline, noting that the activation signal may occur well in advance of the service delivery”. This means that “activation signal” refers to SO notification to the SP. If calibration is allowed and the market participant/SP is required to submit the baseline, it is allowed make calibrations as long as they happen before the GCT.*
- Selecting a BM when multiple available : How to interpret “Full freedom” when multiple markets? => *To clarify that it is applicable to all markets*
- Process enabling market participants to request new or revised baselining methods: processes length and ever used? => *No data in the ACER questionnaires*

EU DSO entity

- Missing information:
 - ✓ ES should have reported a BM under discussion in the context of independent aggregator (declarative BM for balancing services according to **ENTSO-E**) => Some NRAs have preferred not to report BMs under discussion
 - ✓ FR should have reported BMs for DSO CM as planned-BAU (**ENTSO-E**) => Several new baselining methods are currently under discussion for DSO CM in France. CRE did not report these BMs because the law is currently being amended to open DSO CM markets to consumption sites and load shaving.
 - ✓ Incorrect information in NL: Adjacent metering BM for TSO and DSO CM should be declarative (or fixed) => To be clarified with ACM

ENTSO-E

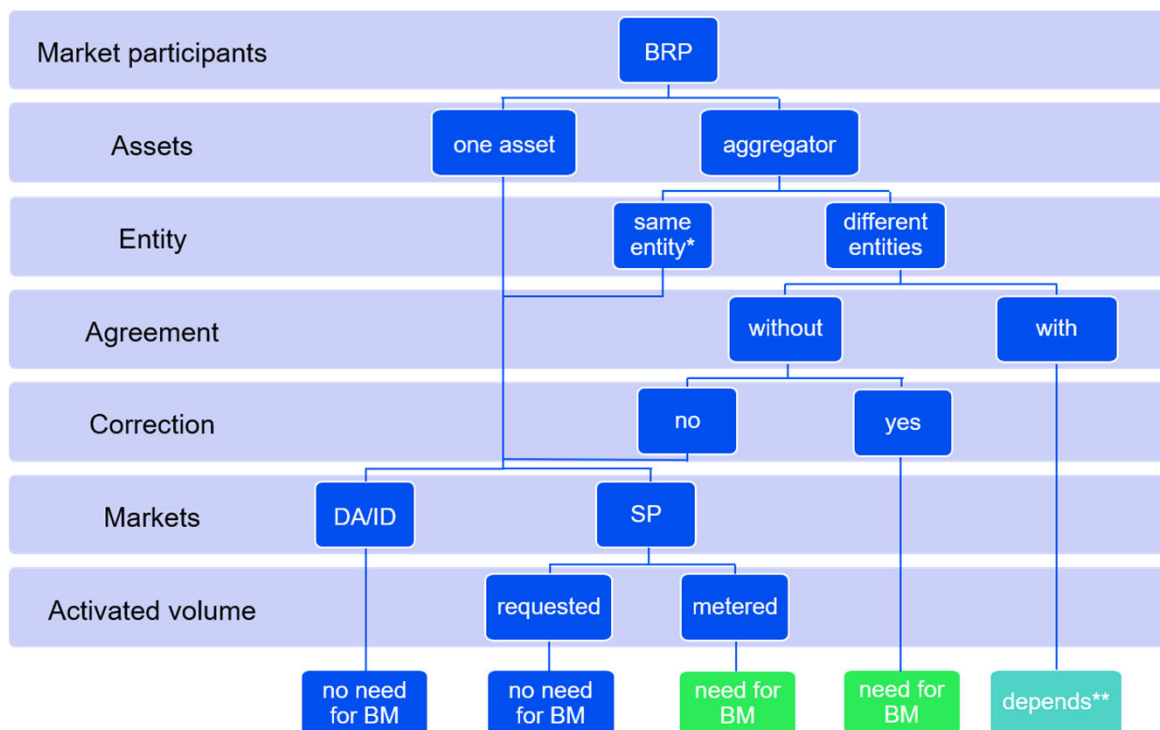
- We would have appreciated more detailed information (e.g. 7 historical BMs in SK, 3 different archetypes for FCR, aFRR and mFRR in DE) => Acknowledged. In the report we will include more detail information on the specific BMs implemented/piloted
- Incorrect information in SE: All BMs have the pilot status but some are now implemented as BAU and some have been employed during pilot projects that are now finished => To be checked with Ei

ENTSO-E

- Missing information in FR: Applicability: Several generation technologies (e.g. solar PV, wind, hydro, nuclear and CCGT units); Using a single baseline for aggregated metering points: Control panels (FR) could potentially be classified as an aggregated approach and may deserve additional consideration in this overview; Preventive measures for accuracy and integrity: Baseline quality testing => **To be clarified with CRE**
- Do we all have the same interpretation of when a baselining method is implemented? In our internal discussions and with DSOs we have discussed 4 stages where baselines/metering data **might be used/required**: 1) Does the SO require a baseline or meter data for the **prequalification**?, 2) Does the SO require the provision of a baseline when **bidding**?, 3) Does the SO require meter data during **delivery of service**?, and 4) Does the SO use baseline/meter data to **validate delivery**? => **ACER intends to include an explanation on the need for a baseline when providing demand response in the arrangement Market participant - SO for two purposes: (a) in the context of imbalance settlement, to correctly allocate responsibilities between different BRPs on the same metering point, and (b) for the settlement of the service provided, when the activated volume is based on metered values => To be discussed Today**

Baselining

Need for a baseline



- Within the scope of the report (market participant – SO), we consider that a baseline is needed mainly for two purposes:
 - 1) imbalance settlement, to allocate responsibilities between BRPs at the same metering point, and
 - 2) service settlement, when activated volume is based on metered values.
- A baseline would be relevant in particular:
 - ✓ for aggregators without a supplier agreement where an imbalance correction is applied, and
 - ✓ for any metered service provision case.
- Where an aggregator and supplier have an agreement, the need for a baseline depends on the scope of that agreement.

Does this overview reflect **your view on the baselining implementation**?

Is there something that you consider is **not represented accurately or missing**?

Is there something you see as **relevant? (for us to further look into)**

*Same entity covers also the case of different entities with submeter, as explained in the report.

**Depends on what the agreement covers.

Market schedules as baselines (1/2)

- Market schedules [from day-ahead and intraday markets](#) constitute an appropriate baseline for [balancing and other post-market operational actions](#) because they represent [the participant's commercially committed position after energy trading](#).
- Compared with [physical schedules](#), market schedules:
 - ✓ reflect [binding commercial position](#) for a given settlement period, while physical schedules reflect operational expectations.
 - ✓ are [less prone to bias, manipulation, or strategic behaviour](#) than physical schedules. If physical schedules were used as baselines, market participants could have incentives to overstate or understate their expected physical behaviour to create artificial flexibility. Physical schedules depend on internal forecasts, technical assumptions, or portfolio decisions, they are more difficult to verify and more open to dispute. Market schedules avoid this risk because they result from organised market processes.
 - ✓ ensure [comparability across technologies and market participants](#), unlike physical schedules that vary by technology and operating characteristics. The distinction market schedules vs physical schedules is particularly important when comparing conventional generation with demand response. For conventional generation, physical behaviour generally follows the market schedule closely, so a physical schedule may be a workable baseline; for demand response, actual behaviour is inherently more variable, so using physical schedules as baselines would be inappropriate and could deter participation.
 - ✓ are [aligned with imbalance settlement and balancing responsibility](#), making them a more coherent baseline than physical schedules.

Market schedules as baselines (2/2)

How are market schedules treated in this report?

- Market schedules used as baselines for balancing or congestion management services are not treated as a separate baselining method in this report.
- Market schedules may be considered as declarative baselines, particularly:
 - ✓ in the integrated aggregation model and
 - ✓ in aggregation models where the aggregator and supplier are separate entities without submetering with an agreement or contractual arrangement under which the supplier commits to sharing the market schedules with the aggregator.
- By contrast, in the remaining aggregation models, market schedules do not fit neatly within the baselining archetypes used in this report, because the aggregator does not decide on the calculation method or the input data used to form the baseline.

What does this mean?

- As an example, if a country reports one declarative BM for TSO congestion management, this means that the SP decides on the calculation method (i.e. formula, algorithm, etc.) or the set of data constituting the baseline provided to the TSO. The SP may decide to use market schedules in some cases. This is reported as a single declarative BM in the report, it is not reported as two declarative BMs: one for market schedules and another one for other calculation methods/set of data decided and used by the SP to estimate the baseline.

Does this reflect **your view on the use of market schedules use as baselines?**

Is there something that you consider **not represented accurately or missing?**

Is there something you see as **relevant? (for us to further look into)**

What is a “Declarative” BM?

Our current definition?

- **Declarative or nomination baselining method:** the market participant decides on the **calculation method** (i.e. formula, algorithm, etc.) or the **set of data** constituting the baseline provided to the SO.

How to make it clearer?

- “**Subjective forecast**” of the activation event
- In the other baselining methods, the calculation method or set of data used to estimate the baseline **are agreed between the market participant – SO** meaning that the results **can be verified** by anyone given the same calculation method or set of data

Does this definition reflect **your view on what makes a baselining method as “declarative”?**

Is there something that you consider is **not represented accurately or missing?**

Thank you. Any questions?

The contents of this document do not necessarily reflect the position or opinion of the Agency.



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