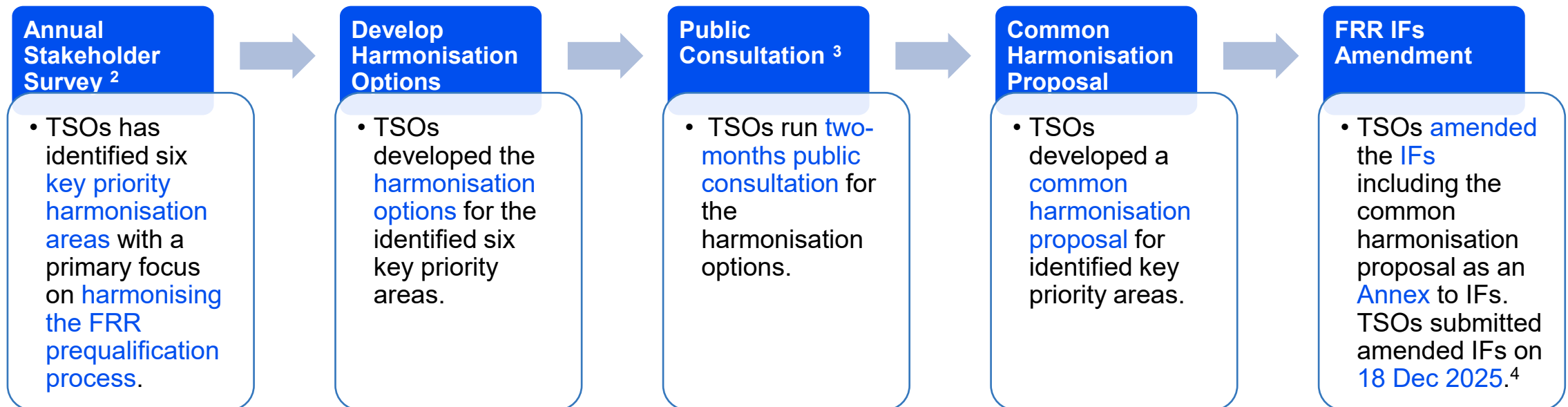


# 1.2 ACER Decision on harmonising prequalification rules for balancing service providers

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- Legal background
- ACER's decision timeline
- Responses from ACER public consultation
- Key principles for T&C harmonisation

- Articles 20-22(3)(f) of the EB Regulation requires all TSOs to include in the [implementation frameworks<sup>1</sup>](#) for the exchange of balancing energy with manual and automatic Frequency Restoration Reserve (FRR IFs), [the framework for harmonisation of the terms and conditions related to balancing set up](#) pursuant to Article 18.
- Article 18 of the EB Regulation requires all TSOs to develop a proposal for [harmonising the terms and conditions for BSPs](#).
- Article 20 of the FRR IFs further outlines the [framework for harmonisation process of terms and conditions for BSPs](#) requiring the TSOs to take the following steps:



<sup>1</sup> ACER Decision on the Implementation framework for a European platform for the exchange of balancing energy from frequency restoration reserves with manual and automatic activation, available at: [Balancing Energy Platforms | www.acer.europa.eu](#)

<sup>2</sup> On 15 May 2023 all TSOs launched the first survey (available at: [https://consultations.entsoe.eu/markets/if\\_survey/](https://consultations.entsoe.eu/markets/if_survey/)) asking stakeholders for input to evaluate the terms and conditions for Balancing Service Providers to identify possible harmonisation needs in the European balancing market. This was followed by a second survey in 2024 (available at: [https://consultations.entsoe.eu/markets/if\\_survey\\_2024/](https://consultations.entsoe.eu/markets/if_survey_2024/)).

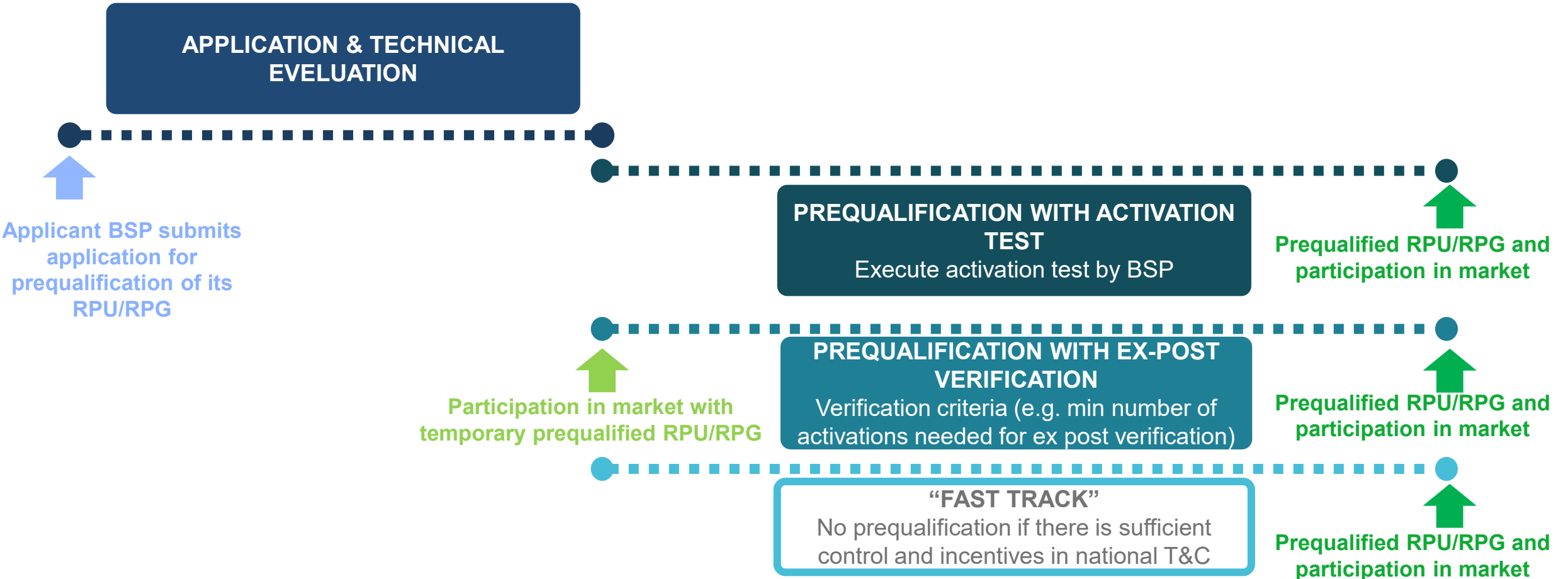
<sup>3</sup> On 2 Jul 2025 all TSOs launched the public consultation on identified harmonisation options concerning terms and conditions related to the aFRR and mFRR Platforms, available at: <https://consultations.entsoe.eu/markets/public-consultation-on-if-amendments/>

<sup>4</sup> Web news including the relevant submitted documents: [ACER to decide on amending the implementation frameworks for two European electricity balancing platforms | www.acer.europa.eu](#)




# Prequalification processes

## Activation test, Ex-post verification, Fast track




<sup>1</sup> Reserve providing unit: a single (e.g. a battery or EV) or an aggregation of power generating and/or demand units proving FCR/FRR and connected to a common connection point.  
Reserve Providing Groups: an aggregation of power generating and/or demand units and/or reserve providing units proving FCR/FRR and connected to more than one connection point.

ACER's public consultation on all TSOs proposals to amend the implementation frameworks for exchange of balancing energy with manual frequency restoration reserve activation and automatic frequency restoration reserve activation



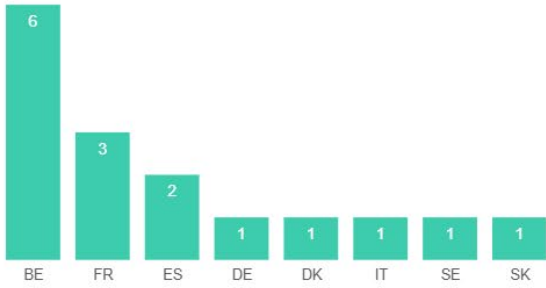
Company's name  
All

RESPONDENTS' COUNTRY



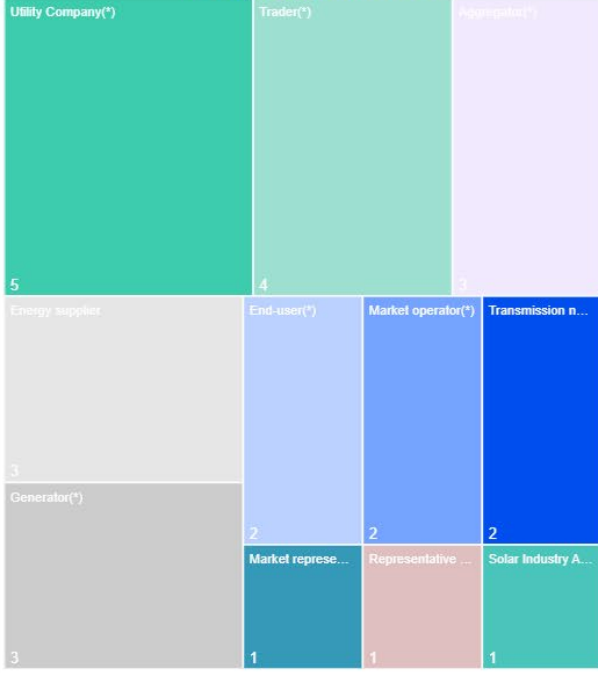
The European Union Agency for the cooperation of Energy Regulator accepts no responsibility or liability for any consequences.

### NUMBER OF RESPONDENTS



Country	Number of Respondents
BE	6
FR	3
ES	2
DE	1
DK	1
IT	1
SE	1
SK	1

### RESPONDENTS' ACTIVITY



Role	Number of Respondents
Utility Company(*)	5
Trader(*)	4
Aggregator(*)	3
Energy supplier	3
Generator(*)	3
End-user(*)	2
Market operator(*)	2
Transmission n...	2
Market repre...	1
Representative ...	1
Solar Industry A...	1

(\*) or association

### CONTRIBUTIONS

Sum of Contributions	16	Sum of Attachments	0
Sum of Written comments	239	Sum of Opinions*	220

\* "No opinion" is not counted.

Feedback:  
<https://www.acer.europa.eu/>

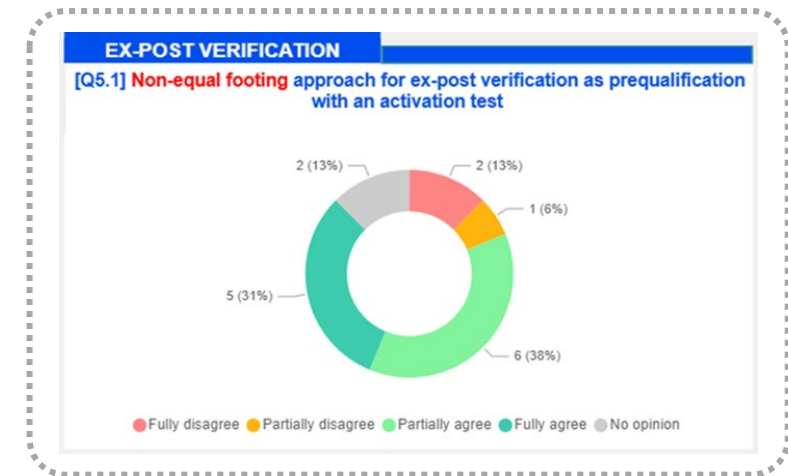
- ASOCIACIÓN DE REPRESENTANTES (ARMIE)
- Centrica
- EDF
- Enel SpA
- Energy Pool
- Energy Traders Europe
- ENTSO-E
- EPIA SolarPower Europe
- Eurelectric
- Gnera Energía y Tecnología, S.L.
- IFIEC Europe
- Modity Energy Trading AB
- RTE
- RWEST
- Slovenské elektrárne, a.s.
- SmartEn

# Responses from ACER public consultation

## Ex-post verification and shorter timeline

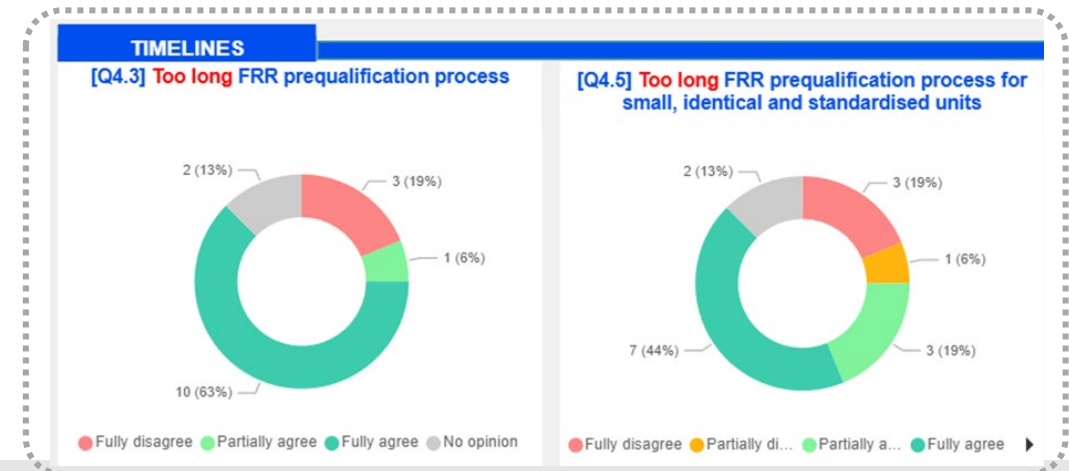
- Responses to the ACER public consultation indicate a need to improve the TSOs proposal with regard to equal footing approach for ex-post verification.

ACER's public consultation



- Responses to the ACER public consultation indicate that the length of the prequalification process is one of the main concerns raised by market participants.

ACER's public consultation



# Responses from ACER public consultation

## Re-prequalification

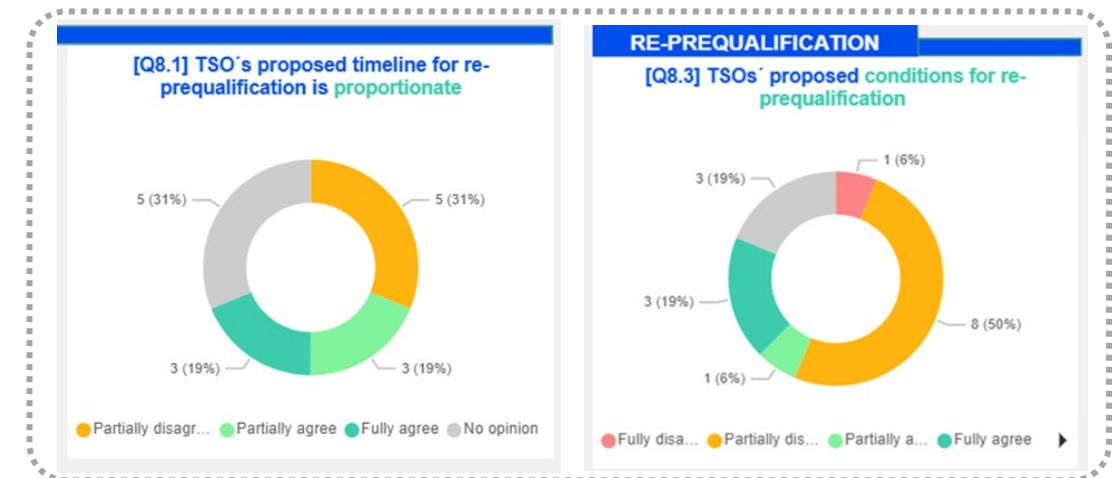
- **Conventional** power generation plants always allocated to the **same BSP**
- **Limited changes** in capacity prequalified, technology, ICT systems
- **Very rarely** re-prequalification or switching

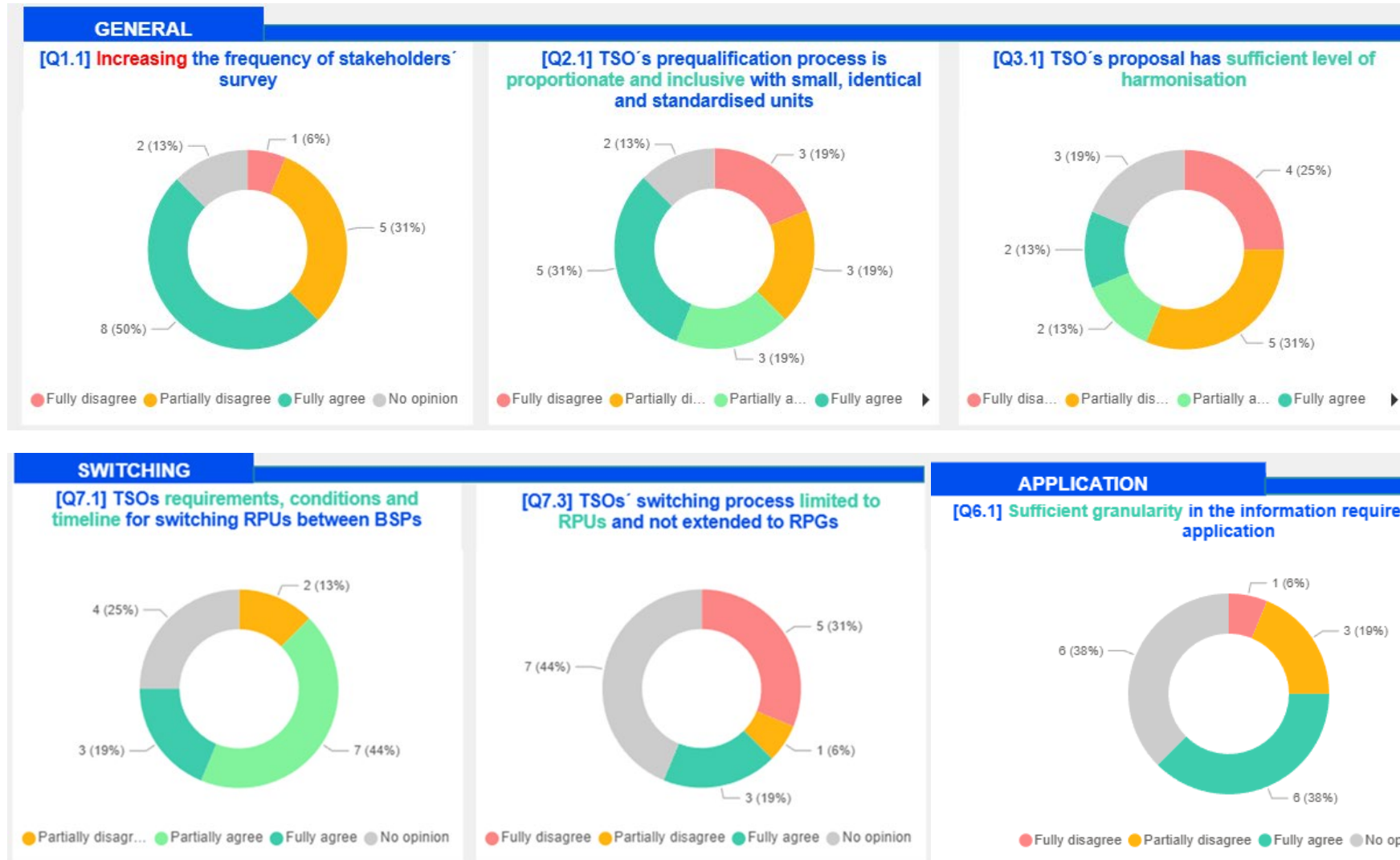


- **Smaller** units and power generation plants, storage and demand units usually changing to a **different BSP (aggregator)**
- **Multiple changes** in capacity prequalified, technology, ICT systems
  - **Frequent** re-prequalification and switching

➤ Responses to the ACER public consultation indicate the need for less conditions and requirement to trigger re-prequalification (if no significant change in technology, ICT systems, capacity, etc).

ACER's public consultation





# Key principles for T&C harmonisation

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ACER considers the TSOs proposal for the harmonised terms and conditions for the FRR prequalification process to be a **positive step forward** and believes they should :

- reduce **administrative burdens**, especially for smaller participants while maintaining **system reliability**. This can be achieved by **avoiding redundant testing**, **shortening prequalification timelines**, and **minimising requirements** where feasible.
- ensure **non-discriminatory market access** and establish a **level playing field** for all technologies and market participants in the European balancing market, in line with **market integration objectives** in EU legislation and ACER's 2021 Wholesale Electricity Market Monitoring Report<sup>1</sup>.
- improve **clarity and readability** to support **transparency** and enhance **stakeholder understanding**.