

2.3 Europex Response to EU DSO & ENTSO-E Public Consultation on the Network Code for Demand Response

- The NC should promote **equal, non-discriminatory and transparent access** to flexibility assets in electricity markets.

- The **impact** of the new rules on the **well-functioning, liquidity and integration** of electricity markets should be properly assessed.

- The current NC draft fails to recognise the role of **PXs, NEMOs and Delegated Operators** in efficiently procuring flexibility.

The NC should be more ambitious in fostering market-based flexibility procurement wr. to the status quo and existing regulation (CEP).

- **Third parties are the most efficient option** to assure the neutrality and transparency of local flexibility markets in MS with multiple TSOs and DSOs.

- **Several discrepancies** occur between the ACER Framework Guidelines and the current NC draft.

- It remains unclear how the new NC will take into account possible new flexibility rules currently discussed in the **EMD review**.