## Comments on the NC DR

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## NC DR process

- Over the last months, exchanges in the Drafting Committee have been increasingly constructive
  - In depth workshops dedicated to particular topics
  - Stakeholders regularly accessing updated drafts
  - ightarrow For some topics, this has lead to increased common understanding and a better draft.
- However, the increased interaction occures after eight months (not only due to waiting for the new market design).

On several topics, a **consensus may not be reached** in the drafting committee in time, and possibly **not even a common understanding** of options and potential consequences.

Further in depth discussions during the ACER review of the draft are welcomed.



## Preliminary view on current developments

For some topics, the late discussions have been **positive**, although the resulting changes in the draft are yet to be seen.

- Dedicated measuring devices
- Activation of flexible connection agreements vs market based
- Redispatching
- Market coordination
- Compensation of supplier/aggregator

For others, in spite of constructuve stakeholder inputs, discussions indicate that the final draft may include **suboptimal solutions or no solutions** at all.

- Procurement of FCAs vs market based
- Setting up of local flexibility markets
- Compensation for restricted market access due to grid constraints
- Baselining (nominative baselines, possibility for third party role)
- Applicability of the network code to already deployed non market based solutions

