

Comments on the NC DR

MESC

28 February 2024



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
 - For some topics, this has led to increased common understanding and a better draft.
- However, the increased interaction occurs 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.

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

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

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