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European Regulation Special Office

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By mail only
Mr Volker Zuleger
Director ACER
Trg republike 3
1000 Ljubljana, Slovenia
director@acer.europa.eu

Cc Mr Lukasz Kolinski
Director Green transition and energy system integration
European Commission
Rue Demot 24 / Demotstraat 24
1040 Bruxelles / Brussel
Lukasz.Kolinski@ec.europa.eu

Milan, 3rd December 2025

Subject: Proposal for the minimum activation period to be ensured by FCR providers in accordance with Article 156(10) of Commission Regulation (EU) 2017/1485 of 2 August 2017 – joint request for a six-month extension pursuant to Article 6(10) of Regulation (EU) 2019/942

Dear Sir,

I write on behalf of all Regulatory Authorities of the Continental Europe Synchronous Area (hereinafter referred to as: CE NRAs), regarding the proposal for the minimum activation period to be ensured by frequency containment reserves (FCR) providers (hereinafter referred to as: Tmin proposal) developed by the TSOs of the Continental Europe Synchronous Area (hereinafter referred to as: CE TSOs) in accordance with Article 156(10) of Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation (hereinafter referred to as: SO GL).

Sede legale
Milano
Corso di Porta Vittoria, 27 - 20122
tel. (+39) 02 65565.200
fax (+39) 02 65565.266

Ufficio Milano
Piazza Cavour, 5 - 20121
tel. (+39) 02 65565.1
fax (+39) 02 65565.266

info@arera.it
www.arera.it

According to Article 6(3)(v) and Article 118 of the SO GL the Tmin proposal is one of the terms and conditions and methodologies belonging to the Continental Europe Synchronous Area Operational Agreement subject to the approval of the competent NRAs. According to Article 156(11) of the SO GL, this specific methodology was due 12 months after the approval of the assumptions and methodology for a cost-benefit analysis (hereinafter referred to as CBA proposal), i.e. by 7th October 2021, given that the CBA proposal was approved by the last concerned regulatory authority on 7 October 2020. The last concerned NRA received the Tmin proposal on 3 December 2021. By Decision No 8/2022 ACER granted the CE NRAs a six-month extension till 3 December 2022 to reach an agreement on the above-mentioned proposal. On 2 December 2022, the CE NRAs addressed the CE TSOs a request for amendment to the Tmin proposal asking for a specific assessment of the frequency regulation performances and for a re-run of the cost benefit analysis to review the relevant assumptions. The CE TSOs failed in accommodating the above-mentioned requests: the CE NRAs acknowledged the failure and on 26 June 2023 identified the appropriate steps for the CE TSOs to resubmit a new Tmin proposal consistent with the request for amendments issued in December 2022. The CE NRAs set the new deadline for the submission of the Tmin proposal to 31 December 2024.

By the end of December 2024, the CE TSOs agreed on a Tmin proposal to be sent to the CE NRAs. On 9 February 2025 the CE synchronous area was extended including the Baltic countries. Hence the Tmin proposal had to be submitted by all the CE TSOs resulting from this geographical extension, including the Baltic TSOs as well. This led to a delay in the formal submission and the last competent NRA received it on 17 June 2025, setting the deadline for the CE NRAs to reach an agreement to 17 December 2025.

While discussing the proposal, the CE NRAs noted that the CE TSOs tend to identify the Tmin from the first instant showing a frequency deviation greater than 50 mHz and not from the triggering of the alert state as prescribed by SO GL. The CE NRAs have been aware of this discrepancy since the approval of the CBA proposal in 2019. At that time, nonetheless, the CE NRAs stated that the CE TSOs should consider the discrepancy when proposing the value for Tmin. Unfortunately, the Tmin proposal submitted in 2025 lacks proper considerations of this topic. The CE NRAs thus started discussions with the CE TSOs to evaluate the implications of the overall dimensioning of the limited energy reservoir resources in view of the relevant provisions of the SO GL. The discussion is still ongoing. The limited energy reservoir resources are usually operated in such a way that they can provide FCR indefinitely within a standard frequency deviation up to 50 mHz. When the frequency deviation exceeds this value, the limited energy reservoir resources start thus depleting their energy even if the alert state has not been triggered yet (Note: the alert state is triggered: i) after 15 minutes of frequency deviation between 50 and 100 mHz, or ii) after 5 minutes of frequency deviation between 100 and 200 mHz). Thus, there will be a loss of energy already during the normal state until the triggering of the alert state, which is not accounted for in the Tmin (as it should be counted as from

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Piazza Cavour, 5 - 20121
tel. (+39) 02 65565.1
fax (+39) 02 65565.266

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the trigger of the alert state). The limited energy reservoir resources should, therefore, have a reservoir sufficient to accommodate both the Tmin and the amount of energy lost within the normal state. This results in a need for over-dimensioning. Understanding the implications of this over-dimensioning requires a proper amount of time. Firstly, the CE NRAs should evaluate the extent of the needed over-dimensioning. Secondly, they should check whether considering this over-dimensioning represents a solid approach to deal with the discrepancy between the CBA simulations (which were run under the assumption of a depletion starting when the frequency deviation exceeds 50 mHz) and the SO GL requirements (Tmin counted as soon as from the triggering of the alert state).

For these reasons, CE NRAs unanimously agree to jointly request ACER for a six-month extension according to Article 6(10) of Regulation (EU) 2019/942, setting the new deadline for reaching an agreement on the Tmin proposal to 17 June 2026.

Yours sincerely,

Francesco Cariello

Francesco Cariello
Autorità di Regolazione per Energia Reti e Ambiente
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Sede legale
Milano
Corso di Porta Vittoria, 27 - 20122
tel. (+39) 02 65565.200
fax (+39) 02 65565.266

Ufficio Milano
Piazza Cavour, 5 - 20121
tel. (+39) 02 65565.1
fax (+39) 02 65565.266

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www.arera.it