

---

**All TSOs' proposal for classification methodology for  
the activation purposes of balancing energy bids  
pursuant to Article 29(3) of Commission Regulation  
(EU) 2017/2195 establishing a guideline on electricity  
balancing**

---

**11 November 2019**

---

Disclaimer: All TSOs submit this proposal taking into consideration market design options agreed by all TSOs, all NRAs requests for amendments and the known status of discussions with ACER on EB GL referred proposals (aFRRIF, mFRRIF, PP). Changes on proposals related to the content of this proposal should be taken into consideration by the relevant regulatory authorities in their approval process.

---

## Content

<i>Whereas</i> .....	3
<b>Abbreviations</b> .....	5
<b>Article 1</b> Subject matter and scope .....	6
<b>Article 2</b> Definitions and interpretation .....	6
<b>Article 3</b> Activation Purposes and Classification Criteria .....	6
<b>Article 4</b> Implementation Timeline.....	8
<b>Article 5</b> Publication of the APP.....	8
<b>Article 6</b> Language .....	8

---

## ALL TSOS, TAKING INTO ACCOUNT THE FOLLOWING:

### Whereas

- (1) This document is a common proposal developed by all Transmission System Operators (hereafter referred to as “TSOs”) regarding the classification methodology for activation purposes of balancing energy bids. The activation purposes proposal is hereafter referred to as the “APP”.
- (2) APP takes into account the general principles and goals set in the Regulation (EC) 2017/2195 establishing a guideline on electricity balancing (hereafter referred to as the “EBGL”), the Regulation (EC) 2017/1485 establishing a guideline on electricity transmission system operation (hereafter referred to as the “SOGL”) as well as Regulation (EC) No 714/2009 of the European Parliament and of the Council of 13 July 2009 on conditions for access to the network for cross-border exchanges in electricity (hereafter referred to as “Electricity Regulation”).
- (3) The goal of EBGL is the integration of balancing markets. To facilitate this goal, it is necessary to develop implementation frameworks for European platforms for balancing energy exchange from frequency restoration reserves with manual and automatic activation, replacement reserves and imbalance netting process. Article 29 of EBGL formulates the requirements regarding the activation of balancing energy bids from the common merit order list of these platforms.
- (4) Article 29(3) of EBGL constitutes the legal basis for this proposal:

*“3. By one year after the entry into force of this Regulation, all TSOs shall develop a proposal for a methodology for classifying the activation purposes of balancing energy bids. This methodology shall:*

  - (a) describe all possible purposes for the activation of balancing energy bids;*
  - (b) define classification criteria for each possible activation purpose.”*
- (5) Article 3 of APP defines activation purposes and provides the classification criteria for each possible activation purpose. Article 4 defines which standard balancing energy product may be activated for which purpose. The requirement of Article 29(3) is fulfilled by the date of submission of APP to all NRAs.
- (6) In the case that a TSO declares the balancing energy bids submitted to the activation optimisation function as unavailable for activation by other TSOs through the common merit order list in accordance with Article 29(14) of the EBGL, this TSO may use the respective bid volumes in accordance with national legislation, which means, where applicable, that it can be activated for balancing or system constraints. For avoidance of doubt, TSOs will submit all standard balancing energy product bids to the European balancing platforms in which they are participating and the TSO will mark the respective bids as unavailable if applicable, in accordance with the EBGL and the implementation frameworks of the platforms.
- (7) The APP fulfils the objectives stated in Article 3 of the EBGL as follows:
  - (a) The APP fulfils the requirements of Article 29(3) of EB GL.
  - (b) As the foundation of the APP is the establishment of the European platforms for the exchange of balancing energy from RR, mFRR and aFRR its contribution to the efficiency, competition and integration of balancing markets must be considered in context of these platforms. The specific contribution of the APP is a harmonized definition of the activation purposes and the respective classification criteria.

- (c) The APP sets non-discriminatory rules and principles as it applies the same rules for all TSOs and BSPs.
- (d) The APP contributes to operational security and considers the agreed European standards and technical specification by fulfilling the SO GL and its supporting document.

---

## Abbreviations

The list of abbreviations used in this APP is following:

- aFRR: frequency restoration reserves with automatic activation
- APP: Activation Purposes Proposal
- BSP: balancing Service Provider
- EBGL: guideline on electricity balancing
- EU: European Union
- mFRR: frequency restoration reserves with manual activation
- NRA: national regulatory authority
- RR: replacement reserve
- SOGL: guideline on electricity transmission system operation
- TSO: transmission system operator

**SUBMIT THE FOLLOWING APP TO ALL REGULATORY AUTHORITIES:**

---

## **Article 1**

### **Subject matter and scope**

- (1) The APP is the common proposal of all TSOs in accordance with Article 29(3) of the EBGL. This proposal defines the methodology for classifying the activation purposes of balancing energy product bids for frequency restoration reserves with automatic activation (hereafter referred to as “aFRR”), frequency restoration reserves with manual activation (hereafter referred to as “mFRR”) and replacement reserves (hereafter referred to as “RR”).
- (2) Where the APP defines different requirements for activation of RR, mFRR and aFRR balancing energy product bids, only the TSOs obliged to implement the European platforms for the exchange of balancing energy in accordance with Articles 19, 20 and 21 of the EBGL are required to comply with these requirements.
- (3) The APP is without prejudice to the methodology that could be defined in national terms and conditions for classifying the activation purposes for the bids that do not fall under the provision of Article 29(4) of EBGL.

## **Article 2**

### **Definitions and interpretation**

- (1) For the purposes of APP, the terms used shall have the meaning given to them in Article 2 of Electricity Regulation, Article 3 of the SOGL and Article 2 of the EBGL.
- (2) In addition, in the APP the following terms shall apply:
  - (a) ‘aFRR balancing energy product’ means the standard or specific product for balancing energy from frequency restoration reserves with automatic activation;
  - (b) ‘mFRR balancing energy product’ means the standard or specific product for balancing energy from frequency restoration reserves with manual activation;
  - (c) ‘RR balancing energy product’ means the standard or specific product for balancing energy from replacement reserves;
- (3) In the APP, unless the context requires otherwise:
  - (a) the singular indicates the plural and vice versa;
  - (b) headings are inserted for convenience only and do not affect the interpretation of the APP;
  - (c) any reference to legislation, regulations, directives, orders, instruments, codes or any other enactment shall include any modification, extension or re-enactment of it when in force;
  - (d) any reference to an article without an indication of the document shall mean a reference to the APP.

## **Article 3**

### **Activation Purposes and Classification Criteria**

- (1) Each TSO in accordance with Article 1(1) of this APP shall use the following activation purposes for the bids from the common merit order list pursuant Article 29(4) of the EBGL:
  - (a) balancing;
  - (b) system constraints.
- (2) Each TSO in accordance with Article 1(1) of this APP activating the bid from the common merit order list are allowed to use all balancing energy product bids for balancing purposes, whereas TSOs are

---

allowed to use RR and mFRR balancing energy product bids for balancing and system constraint purposes.

- (3) Each TSO in accordance with Article 1(1) of this APP shall comply with following classification criteria for different balancing energy products when activating bids from the common merit order list or locally for balancing purposes:
  - (a) RR balancing energy product bid: activation aims to achieve the control target of the reserve replacement process in accordance with Article 144(1) of the SOGL;
  - (b) mFRR balancing energy product bid: manual activation aims to achieve the control target of the frequency restoration process in accordance with Article 143(1) of the SOGL;
  - (c) aFRR balancing energy product bid: automatic activation aims to achieve the control target of the frequency restoration process in accordance with Article 143(1) of the SOGL.
- (4) Each TSO shall comply with following classification criteria for when activating bids from the common merit order list or locally for system constraint purposes:
  - (a) activation to maintain voltage limits in accordance with Article 27 of the SOGL;
  - (b) activation to maintain power-flow limits in accordance with Article 32 of the SOGL;
  - (c) activation to maintain short-circuit current limits according to Article 30 of the SOGL and Article 31(3) of the SOGL;
  - (d) activation to maintain the dynamic stability limits in accordance with Article 39 of the SOGL;
  - (e) activation to maintain reactive power reserves in accordance with Article 29 of the SOGL;
  - (f) activation to maintain active power reserves in accordance with Article 152(1) of the SOGL;
  - (g) activation to maintain system margin ensuring that active and reactive power reserves, are sufficient in accordance with Article 18(1)(c) of the SOGL, to restore the normal state in accordance with Article 18(1) of the SOGL, to prevent an alert state in accordance with Article 18(2) of the SOGL and to prevent an emergency state in accordance with Article 18(3) of the SOGL.
- (5) In accordance with Article 29(4) of the EBGL, when activating standard RR or mFRR balancing energy product bids from the common merit order list, the activation optimisation function of the respective European balancing platform shall identify the system constraint activation purpose for all selected standard RR or mFRR bids as follows:
  - (a) The TSO may submit requests for bid activations due to system constraints for an interconnector, a border or a set of borders, as an additional input constraint to the activation optimisation function while complying with the list Article 3(4) of the APP.
  - (b) The activation optimisation function shall select the bids by performing an optimisation without considering the requests for system constraint purpose submitted in accordance to paragraph 5(a) of this Article.
  - (c) The activation optimisation function shall select bids by performing an optimisation that takes into account the requests for system constraint purpose submitted in accordance to paragraph 5(a) of this Article. If the optimisation has a feasible solution, the TSOs shall activate the selected bids. Otherwise, the TSOs shall activate the bids selected in this paragraph 5(b) of this Article.
  - (d) The bids which are selected in accordance with the optimisation of this paragraph 5(c) but not in (b) of this Article are selected for system constraint purpose.

- 
- (6) Without prejudice of rules that could be defined in national terms and conditions, when activating RR or mFRR balancing energy product bids locally, the TSO may specify the activation purpose for each selected bid as follows:
- (a) The bids selected due to reasons specified in Article 3(3) of the APP are activated for balancing purpose.
  - (b) The bids selected due to reasons specified in Article 3(4) of the APP are activated for system constraint purpose.
- (7) Submitting requests for system constraint purpose shall be coordinated with the concerned TSOs in accordance with Article 21(1)(b) of the SOGL.

#### **Article 4 Implementation Timeline**

Each TSO shall apply this APP for standard balancing energy products bids once the TSO is connected to the respective European balancing platform for the exchange of balancing energy in accordance with the Articles 19, 20 or 21 of the EBGL.

#### **Article 5 Publication of the APP**

The TSOs shall publish the APP without undue delay after all NRAs have approved the proposal or a decision has been taken by the Agency for the Cooperation of Energy Regulators in accordance with Article 5(7), Article 6(1) and Article 6(2) of the EBGL.

#### **Article 6 Language**

The reference language for the APP shall be English. For the avoidance of doubt, where TSOs need to translate the APP into their national language(s), in the event of inconsistencies between the English version published by TSOs in accordance with Article 29(3) of the EBGL and any version in another language, the relevant TSOs shall be obliged to dispel any inconsistencies by providing a revised translation of the APP to their relevant national regulatory authorities.