

Response to the RTE amended market rules related to balancing topics

Brussels, 1 August 2025

General remarks

- We welcome transparency on the proposed changes and explanations behind decision-making.
- We also welcome reflecting changes to the aFRR market in France and developments towards MARI accession.

Detailed comments

Chapter 0 General conditions

Deletion of terms and notions linked to TERRE and standard offers of RR

We have no specific comment. We welcome the fact that the termination of the TERRE platform is reflected in national rules, provided the technical requirements are met, and that the phase-out occurs under the best possible conditions for market participants (e.g., not on a bank holiday or the first day of a month).

Evolution of model for first demand Guarantee and definition of period RécoTemp A'

No comment.

Addition of article on market surveillance

We highlight the importance of a clear information request procedure for market participants. We also wonder if there might be a duplication of regulatory oversight between the CRE and RTE in their monitoring roles. Nonetheless, we encourage good information flows between the TSO and NRA on REMIT when investigating possible breaches.

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Precisions on user criteria of simple rectangle method

No comment.

Deletion of definitions linked to capacity mechanism in general dispositions

No comment.

Chapter 1 Programming

Creation of quality of programming indicators

No comment.

Failures of EDP (Entité de Programmation) penalties

We agree with having a proportional penalty to the size of the failure. We note the differing predictability of RES assets compared to conventional programmable ones. Such differences should also be considered in the failure thresholds.

Entry into force of aggregated programmes return by DSOs

No comment.

Diverse writing amendments

We welcome the clarifications and recommend reflecting filial differences, notably in failure thresholds. Furthermore, we recommend that the proposed formulas be validated through back-testing with historical data.

Chapter 2 Adjustment mechanism

Introduction of participation obligation threshold to adjustment mechanism for producing installations connected to electricity public transport network and public distribution network

We welcome incentivising wider participation in balancing mechanisms.

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Modifications of participation conditions of Adjustment Entity (EDA) directly or indirectly connected to the electricity transport network

We support helping participation by addressing market access barriers.

Evolution of framework for small adjustment offers

We request a clarification on the criteria in the rules defining a “small” offer.

Concerning the derogation for the 30-minute switch to the intraday cross-zonal gate closure time, we reiterate our encouragement for an implementation as soon as possible.

We invite RTE to publish a detailed implementation plan aiming for a go-live even before the final deadline granted by the CRE exemption of 23 July 2025. We will request that CRE closely monitor progress to avoid any additional delay beyond the exemption initially granted.

Introduction of calculation and publication of adjustment volumes done on Plant resolution for stationary storage and injection sites in transmission and distribution networks

More granular resolution can be useful if it brings additional transparency and helps with market functioning.

Evolutions related to MARI

We support the integration of changes related to the MARI accession within the national rules. We underline the importance of coherent national rules for the accession to the EU balancing platforms for smooth platform functioning. Furthermore, we emphasise the importance of proactively transitioning BSP actively participating in TERRE to MARI, to ensure a seamless process for the system.

Introduction of neutralisation of programming gap in the calculation of volume realised for EDA injection

It is good to see proactive actions tackling potential issues ahead by avoiding the ex-post correction of the balancing perimeter.

Diverse writing amendments

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No comment.

Chapter 3 Balancing Responsible Parties

Definition of operational modalities for the last truncated temporal reconciliation

No particular comment as the modifications appear to reflect changes in the legislation.

Evolutions on financial security: calendar for notifications and formal notice for first demand Guarantees and cash deposits, switch to electronic formal notice

We welcome the move towards electronic communication means as it can help enhance market operational efficiency.

Change in the notification period for the k coefficient to the BRP

No comment.

End of billing for the BRP when activating network flexibilities under FiT

The modifications are coherent with recent legislative changes incentivising RES under support mechanisms to better react to negative spot price periods.

Extension of the corrected model for CARD-S withdrawal sites participating in SSyf

No comment.

Publication of data to BRPs at the site level for adjustment and control energies produced by injection and stationary storage sites included in the balancing perimeters

We welcome data transparency while remembering the importance of confidentiality.

Harmonisation of the Network Flexibility framework between the Transport network and the distribution network

As elements are yet to be provided, it would be helpful to see them issued within a reasonable time.

Chapter 4 SSyf System Frequency services

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Developments in the secondary reserve capacity tender (aFRR)

No comment.

Creation of a certification and control framework for renewable energy power generation facilities

As it is experimental, we would suggest a detailed analysis of the results to see if there is improved RES participation.

Developments in the certification process for similar EDR (Entity responsible for reserves)

If the simplification procedure helps bring more participants to reserve management, it could be useful.

Developments in the treatment of balancing energy from distribution network withdrawal sites

No comment.

Clarifications to transitional provision 4.S.7 relating to the participation of sites subject to SSYf restrictions & Annex 4 modification

No comment.

Harmonisation of the site agreement between Chapter 2 on MA and Chapter 4 on SSYf

No comment. We support keeping the coherence within market rules.

Change to transitional provision 4.S.6 on changes to the composition of a Diffuse Reserve Responsible Entity

If it helps incentivise participation, we have no specific comment.

Integration of the change in the value of TminLER & evolution to 30 minutes

We understand that RTE wishes to have the rules ready for when the ACER decision is made. We wonder if it would not be more coherent to wait for the ACER decision in case of differences to RTE's input.

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Other modifications

We welcome the modifications reflecting EU regulatory changes, such as the switch to 15 minutes for the Market Time Unit and the Imbalance Settlement Period.

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