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Smart Energy Europe

smartEn Position Paper

State aid for resource adequacy: recommendations for the
revision of the Guidelines

Smart Energy Europe
Rue d'Arlon 69-71,
BE-1040 Brussels

+32 (0) 2 58 88 992
info@smarten.eu
www.smarten.eu

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About smartEn - Smart Energy Europe

smartEn is the European business association for digital and decentralised energy solutions. Our members include innovators in services and technology for energy and data management, finance and research. By taking an integrated perspective on the interaction of demand and supply, we promote system efficiency, encourage innovation and diversity, empower energy consumers and drive the decarbonisation of the energy sector.

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State aid for resource adequacy: recommendations for the revision of the Guidelines

POSITION PAPER

Summary of key recommendations

It is no news that investment decisions made by companies are based on the revenues that can be generated by participation in different markets. Existing capacity mechanisms are a (significant) revenue stream for some companies active in Demand Response (DR) and other innovative flexibility solutions, such as energy storage and distributed renewable energy generation. Other companies are looking to capacity mechanisms as a possible additional revenue opportunity. Yet some market players consider capacity mechanisms as a possible barrier to DR and innovative flexibility solutions. This is often the case when the participation of these resources is hindered or if these mechanisms lead to an oversupply.

This Position Paper is a compromise of different views on capacity mechanisms and defines smartEn's contribution to the revision of the Guidelines on State aid for environmental protection and energy post-2022.

This Position Paper does not intend to comment on whether capacity mechanisms are necessary for ensuring security of supply in Member States, for how long they should be set or under which conditions. Rather, it aims at giving recommendations on the design of capacity mechanisms only IF they are established by a Member State and the lenses through which the Commission should assess them.

The following principles and recommendations are identified as:

1. Consistency between the Electricity Regulation and the new Guidelines

Equal-treatment and technology neutrality of all resources are clear principles enshrined in the Electricity Regulation to govern capacity mechanisms and should guide the revision of the Guidelines post-2022.

2. Truly non-discriminatory treatment of DR and innovative flexibility solutions in the new Guidelines

The first capacity mechanisms were designed to support centralised energy generation. Now capacity mechanisms should evolve to allow the non-discriminatory participation of DR and other decentralised and innovative flexibility solutions. This flexibility is a key resource in a market where the share of variable generation from renewable energy sources is increasing. It is crucial to change the mindset of policy-makers when shaping mechanisms to solve resource adequacy concerns: demand-side solutions must always be given equal opportunities to generation. Non-discrimination for decentralised energy solutions should be ensured in the new Guidelines, fully reflecting the increasing need for and value of flexibility in the system.

3. No specific State aid for decentralised energy solutions to solve resource adequacy concerns

Innovative flexibility solutions and DR should participate in all mechanisms and not be confined to specific schemes.

4. A common approach towards "Unlawful State aid"

Every capacity mechanism should first be authorised by the Commission and be compliant and consistent with the revised Guidelines and the Electricity Regulation. No exemptions or derogations should be allowed.

5. Non-discriminatory treatment for all decentralised energy solutions, including Strategic Reserves

Strategic Reserves should be organised in a transparent way to ensure certainty for all market participants. The fair treatment of DR and other innovative flexibility solutions should be safeguarded with Strategic Reserves. As loads cannot "retire" from taking part in the general electricity market in the same way as power plants, it should be made possible for loads to offer their flexibility to all electricity markets and mechanisms, both before and after the contractual duration of the Strategic Reserves.

6. Special attention to interruptibility schemes

Similar to the approach to be adopted for "Unlawful State aid", all interruptibility schemes should be assessed in the context of the application of the revised Guidelines post-2022. No special treatment should be allowed for interruptibility schemes.

Background

In order to prevent State aid from distorting competition, the Treaty on the Functioning of the EU lays down the principle that State aid is prohibited. However, under certain conditions, State aid may be compatible with the internal market when it facilitates the development of certain economic activities, where such aid does not adversely affect the common interest. It is the role and exclusive power of the Commission to assess this compatibility.

In 2014 the Commission adopted Guidelines for the assessment of State aid for environmental protection and energy for the period 2014-2020 (the “Guidelines”). They cover different aid measures, including aid for “generation adequacy”¹ such as capacity mechanisms. The Guidelines are the legal framework that the Commission uses to assess the compatibility of aid measures, including capacity mechanisms, that are notified by Member States and/or that the Commission investigates on.

Although the Guidelines were originally valid until 2020, on 7 January 2019, DG Competition announced that several sets of State aid rules, including the Guidelines, are being extended until the end of 2022. The Commission also announced the launch of a “fitness check” to evaluate those rules. It will involve internal analyses within the Commission, targeted enquiries towards stakeholders and a public consultation. The latter is expected in the course of the second trimester of 2019 and **this Position Paper is a first opportunity for smartEn to engage in the design of the future legal framework for State aid for resource adequacy.**

A few weeks before this announcement by DG Competition, in December 2018, EU institutions reached a formal political agreement on the Regulation on the internal market for electricity (the “Electricity Regulation”), which is a pillar of the new EU electricity market design. The Electricity Regulation was approved by the European Parliament on 26 March 2019 and will be applicable as from 1 January 2020. These rules will form the binding EU legislative act, enforceable as law in all Member States simultaneously.

Resource adequacy and capacity mechanisms are governed by specific provisions in this Regulation (see articles 18-22), which define their design and general acceptable conditions. The new rules require that any capacity mechanism be open to the participation of all resources, including storage and demand-side management that can provide the required technical performance. These articles are key EU framework for capacity mechanisms, which must be considered when revising the specific aid for resource adequacy measures in the Guidelines post-2022.

¹ The Electricity Regulation uses the term “resource adequacy”, which is also the terminology smartEn recommends using in the revised Guidelines post-2022. This terminology clearly includes Demand Response, compared to the old notion of “generation adequacy” which favours the supply side.

1. CONSISTENCY BETWEEN THE ELECTRICITY REGULATION AND THE NEW GUIDELINES

Equal-treatment and technology neutrality of all resources are clear principles enshrined in the Electricity Regulation to govern capacity mechanisms and should guide the revision of the Guidelines post-2022.

In the implementation of the Clean Energy Package, priority should be given to the elimination of market barriers for market entry and exit for all decentralised energy resources to all energy markets. Policies should be transparent and ensure direct competition between demand and supply, on an equal level-playing field and with unbiased market rules. **The establishment of well-functioning and liquid electricity markets is the top priority for the years to come.** This is the most appropriate market design in the transition to a clean energy system. The principle of non-discrimination should also apply to the design of capacity mechanisms.

Within the Electricity Regulation, smartEn welcomes the political agreement on some provisions related to capacity mechanisms:

- capacity providers shall be selected by means of a transparent, non-discriminatory and competitive process (art. 18b.1.c);
- any capacity mechanism shall be open to the participation of all resources, including storage and demand side management, that are capable of providing the required technical performance (art. 18b.1.h);
- the transparent methodology set for the European Resource Adequacy Assessment shall appropriately take into account the contribution of all resources including existing and future generation, energy storage, sectoral integration, demand response, and import and export possibilities and their contribution to flexible system operation (art. 19.4.c).

The Electricity Regulation establishes a clear principle: when a capacity mechanism is introduced, its design shall allow all decentralised energy solutions to participate, both individually and through aggregators. No discrimination or barriers hindering the participation of demand-side resources shall be permitted. Capacity mechanisms shall be technology neutral. In this light, a capacity mechanism originally designed around centralised generation should be modified and adapted as quickly as possible to allow the non-discriminatory participation of DR and other decentralised and innovative flexibility solutions.

Even though Member States are legally obliged, as from the date of entry into force of the Electricity Regulation, to comply with the new rules when designing capacity mechanisms, **smartEn recommends having the clear principles set in the Electricity Regulation as the guiding force for the revision of the Guidelines. These provisions are the baseline and starting point for the chapter on aid for resource adequacy, in the new Guidelines, and consistency should be ensured.**

Specific references to the Electricity Regulation in the revised Guidelines should be included, for example, with a paragraph stating that “when granting aid for resource adequacy, Member States must respect the Electricity Regulation, in particular articles 18-22, which lay down criteria in relation to capacity mechanisms”. As provisions for fair treatment have not always been implemented effectively, a clear reference and interpretation of the principles set out in the new Electricity Regulation is needed. The proposed paragraph would reinforce the obligation of Member States to propose, and the Commission to authorise, only capacity mechanisms that comply with the new rules.

Some capacity mechanisms were designed to encourage new capacity when there was already enough. In some cases, this has resulted in levels of capacity well in excess of that required to comply with the accepted reliability standard, forcing consumers to pay for capacity that is not value for money.

However, a well-designed capacity mechanism that allows for the effective participation of all decentralised energy solutions would reduce the risk of oversupply. In fact, there is a wide range of loads that are best suited to supplying capacity that will rarely be used. Providing this demand-side flexible capacity is both valuable and very cost-effective, because it substitutes for peaking generators that would otherwise have to be built and maintained, but run for very few hours per year. Capacity mechanisms enable this by offering certainty about revenue for customers, who need to be convinced that participation is worthwhile, and for aggregators to feasibly build viable businesses.

2. GENUINELY NON-DISCRIMINATORY TREATMENT OF DEMAND RESPONSE AND INNOVATIVE FLEXIBILITY SOLUTIONS IN THE NEW GUIDELINES

The first capacity mechanisms were designed to support centralised energy generation. Now capacity mechanisms should evolve to allow the non-discriminatory participation of DR and other innovative flexibility solutions. This flexibility is a key resource in a market where the share of variable generation from renewable energy sources is increasing. It is crucial to change the mindset of policy-makers when shaping mechanisms to solve resource adequacy concerns: demand-side solutions must always be given equal opportunities to generation. Non-discrimination for decentralised energy solutions should be ensured in the new Guidelines, fully reflecting the increasing need for and value of flexibility in the system.

Until now, four specific provisions related to capacity mechanisms in Chapter 3.9 of the Guidelines on Environmental Protection and Energy have been helpful for the consideration of DR and innovative flexibility solutions in the assessment of the capacity mechanisms submitted by Member States to the Commission:

- Paragraph 220 (under the section “Objective of common interest”) which provides that aid for generation adequacy may contradict the objective of phasing out environmentally harmful subsidies and encourages the Member States to primarily consider alternative ways of achieving generation adequacy², such as facilitating demand-side management;
- Point b of paragraph 224 (under the section “Need for State intervention”) which requires the Commission to take account the assessment of the impact of demand-side participation, including a description of measures to encourage demand side management;
- Paragraph 226 (under the section “Appropriateness”) which foresees that the measure should be open and provide adequate incentives to both existing and future generators and to operators using substitutable technologies, such as demand-side response or storage solutions;
- Paragraph 229 (under the section “Proportionality”) which defines a competitive bidding process based on clear, transparent and non-discriminatory criteria, effectively targeting the defined objective.

However, these are very limited provisions within the broader narrative and scope of this chapter, which gives much more consideration to generation than demand. Even the title, “Aid for Generation Adequacy”, suggests preferential treatment for generation compared to demand-side solutions. This is now inconsistent with the newly adopted rules in the Electricity Regulation. In fact, in a market with increasing shares of variable renewable energy generation, the importance of flexibility will only continue to increase. **smartEn believes this imbalance of focus should be corrected. A change in the title to “Aid for Resource Adequacy” would foster a genuinely non-discriminatory treatment of innovative flexibility solutions, encouraging a change of approach by policy-makers shaping capacity mechanisms.**

² “Generation adequacy” is the incorrect wording used in the 2014 Guidelines, also in this paragraph. As highlighted in recommendation n.2, smartEn suggests using the term “resource adequacy”

3. NO SPECIFIC STATE AID FOR DECENTRALISED ENERGY SOLUTIONS TO SOLVE RESOURCE ADEQUACY CONCERNS

Innovative flexibility solutions and DR should participate in all mechanisms and not be confined to specific schemes.

Among the diversity of capacity mechanisms, some Member States have established specific schemes targeting DR, with the objective of eliminating adequacy concerns. This solution is not ideal, as it often confines DR to a specific part of the market. Rather, all markets and mechanisms should be designed to enable the full participation of DR and other innovative flexibility solutions. For example, a specific State aid scheme for DR or energy storage could be counterproductive if it prevents these innovative solutions from accessing and participating in other markets.

smartEn believes that a market-based approach, without barriers to DR and other innovative flexibility solutions, is preferred to subsidies targeting specific services from DR or other innovative energy solutions to solve resource adequacy concerns. In short, the ideal scenario would be a capacity mechanism that is designed to buy the most cost-effective resource to cover the actual system needs in a genuinely technology-neutral environment. This approach, specifically targeting capacity mechanisms, should not preclude Member States from supporting the development of DR through other specific measures, policies and incentives.

4. A COMMON APPROACH TOWARDS UNLAWFUL STATE AID

Every capacity mechanism should first be authorised by the Commission and be compliant and consistent with the revised Guidelines and the Electricity Regulation. No exemptions and derogations should be permitted.

Across the European Union, there are multiple cases of capacity mechanisms which the Commission has never been notified of, and therefore the EU executive has never had the possibility to assess and authorise these capacity mechanisms. These are the so-called “Unlawful State aid” giving an unfair advantage. Some of them target generation only, others support also demand.

smartEn believes that consistency should be ensured across the European Union on the application of EU rules governing capacity mechanisms and State aid. smartEn recommends that the Commission assess the “Unlawful State aid” cases under the post-2022 Guidelines to ensure all capacity mechanisms are compliant and consistent with the EU framework.

Market certainty and security for investments are key for all market players, including companies active in DR and other innovative flexibility solutions, not just for those investing in generation capacity. Hence, **it is imperative that this assessment not impose retroactive penalisation on any market party**, but provides recommendations for their improvement in the medium-term.

5. NON-DISCRIMINATORY TREATMENT FOR ALL DECENTRALISED ENERGY SOLUTIONS INCLUDING STRATEGIC RESERVES

Strategic Reserves should be organised in a transparent way to ensure certainty for all market participants. The fair treatment of DR and other innovative flexibility solutions should also be ensured in Strategic Reserves. As loads cannot “retire” from participating in the general electricity market in the same way as power plants, it should be possible for loads to offer their flexibility into all electricity markets and mechanisms, both before and after the contractual duration of the Strategic Reserves.

The role of Strategic Reserves was discussed extensively during the negotiations on the Electricity Market Design. Article 18b.2 of the Electricity Regulation sets out their design principles and clarifies how resources in the Strategic Reserve shall:

- (paragraph a) only be dispatched when Transmission System Operators (TSOs) are likely to exhaust their balancing resources, in order to establish an equilibrium between demand and supply;
- (paragraph d) not get remunerated through wholesale electricity markets or balancing markets;
- (paragraph e) be held outside of the market, at least for the duration of the contractual period, in order not to affect market price signals.

Building on the provisions set out in the Electricity Regulation, **smartEn recommends clarifying in the new Guidelines that:**

- a) **transparent and clear rules must be defined to guarantee security for investments for all market participants and avoid any kind of political interference on when and how to trigger strategic reserves.**

It is no surprise that transparency and security for investments are key. However, this is not always the case for certain mechanisms. For example, the new Belgian Strategic Reserve for 2019-2020 is in principle a technological neutral scheme open to DR. However, there is significant uncertainty on whether an auction will be organised. The strategic reserve is triggered on an annual basis, and the final decision is subject to political validation. For example, despite scarcity on the grid during the 2018-2019 winter, no reserve was contracted.

- b) **Strategic Reserves should set non-discriminatory conditions for the participation of different resources that can provide the required technical performance, individually or aggregated.**

Strategic Reserves should reflect the system needs in an objective manner, without a specific focus on generation. Although technology neutrality is clearly set in the general rules for capacity mechanisms in the Electricity Regulation (article 18b.1.h), it is not explicitly mentioned in the specific provisions targeting Strategic Reserves in the Electricity Regulation and **any potential misunderstanding should be avoided in the implementation of the Regulation at national level.**

Proof of the need for this clarification is provided by the recent German Capacity Reserve³ (entered into force on 6 February 2019 after a review at federal level). It is going to de facto favour generation over demand-side solutions as demand-side solutions can only satisfy some tender rules.

- c) **All decentralised energy solutions should be enabled to offer their flexibility into all electricity markets and mechanisms when not under the contractual period covered by the Strategic Reserve. In particular, the exclusion from markets and other schemes should be limited to no more than 9-12 months before the auction to Strategic Reserves.**

Unlike generation, DR and other innovative flexibility solutions are always part of the market and cannot be moved into an “exclusive scheme” in the same way as generation. What is more, a demand-side load may be better suited to provide capacity for some time, but before and after, may have a different consumption pattern

³ Commission’s decision on SA.45852 - 2017/C (ex 2017/N) which Germany planned to implement for the Capacity Reserve.

and be more suited to participate to other markets and mechanisms. However, article 18b.2.e of the Electricity Regulation might be implemented in an extensive way: the eligibility requirements in the reserves programme might lead to the de facto exclusion of some business opportunities for flexibility solutions and operators. smartEn believes that the revision of the Guidelines should help clarify this important aspect related to the competitiveness and profitability of all decentralised energy solutions and related business models. This is key for an efficient allocation of flexibility resources for different markets to ensure the best economic outcome.

For example, the German Capacity Reserve states that capacities in the reserve cannot participate in markets during the contractual period and establishes that:

- Load capacities cannot participate in either the interruptibility scheme or balancing markets in the 36 months prior to auction for the German Capacity Reserve;
- Load capacities in reserve can return to all markets afterwards, but not the interruptibility scheme.

Specifically, non-participation in the interruptibility scheme or balancing markets in the previous 36 months seems too long for DR. For example, industrial decisions on how to valorise the flexibility of industrial assets are decided on quite short notice. A lead-time of 36 months is a barrier for industrial and controllable loads to participate in the capacity reserve, since their planning and decision-making processes are usually considerably shorter.

6. SPECIAL ATTENTION TO INTERRUPTIBILITY SCHEMES

Like the approach to be adopted for “Unlawful State aid”, all interruptibility schemes should be assessed in the context of the application of the revised Guidelines post-2022. No special treatment should be allowed for interruptibility schemes.

“Interruptibility schemes” exist in a few Member States (e.g. Italy, Spain, France and Germany). These can be considered a kind of Strategic Reserve for DR, limited to the participation of large industrial consumers. There is no specific provision in the 2014 Guidelines on these schemes.

Although beneficial to solve some emergency situations, interruptibility schemes in Italy, France and Spain often appear to function as specific subsidies limited to industrial plants (>50 MW in Italy and Spain, >25 MW in France). The large flexibility potential of these end-users is prevented to take part in modern DR programmes, as they are locked into the interruptibility schemes which provide higher rewards. Aggregated loads cannot participate either. Also, these existing schemes have never been assessed by the European Commission.

In France, the tender to be organised by the TSO to source this interruptibility capacity is foreseen in article L321-19 of the energy code. The total value of this scheme amounts to €18 million and the 22 industrial beneficiaries⁴ receive a considerable compensation (that can go up to 90k€/MW/year) only for ensuring their availability to reduce their loads in a few seconds for a duration of 20-45 minutes. Introduced in 2014, it was activated for the first time only once on 10 January 2019. Investigations are ongoing to assess whether this activation was due to a substantial and immediate threat⁵.

Although limited only to loads, the German interruptibility scheme (Abschaltbare Lasten “AbLaV”) is different to those in other Member States. It is open to aggregators, smaller assets (from 5MW) and assets at lower grid levels can also participate. It serves as an attractive way to unlock flexibility that can also be placed in other markets.

The European Commission assessed and authorised⁶ the AbLaV, which allows industrial plants to choose between immediate interruption within 350 milliseconds or fast interruption within 15 minutes after a TSO request⁷.

⁴ Two options are possible for sites bigger than 25 MW: interruptible power above 40 MW (7500 h) and interruptible power between 25 MW and 100 MW (4500 h). Remuneration depends on the option.

⁵ www.entsoe.eu/news/2019/01/16/frequency-drop-in-continental-europe/

⁶ Commission’s decision of 24 October 2016 on SA. 43735

⁷ The Commission’s decision authorising the AbLaV was also based on the fact that “In total, TSOs will be allowed to contract up to 1500 MW of so-called interruptible loads, i.e. demand response, from medium-sized and large energy users with a stable load

AbLaV has helped the TSO to ensure system stability quite frequently⁸ and the number of participants and volumes have increased steadily.⁹

As highlighted in Chapter 3 of this Position Paper, smartEn believes that innovative flexibility solutions and DR should be enabled to allow for participation in all mechanisms and not be confined to specific schemes. **Where such specific schemes still exist, such as the interruptibility schemes outlined in this Chapter, smartEn urges the Commission and Member States to adopt a common approach towards them: they should be at least inspired by the method and design of the German AbLaV.**

In addition, **to avoid distortion and an obstacle to the development of modern, market-driven, aggregated DR, smartEn recommends that the Commission assesses all interruptibility schemes under the post-2022 Guidelines to ensure consistency and compliance with the EU framework. Additionally, such an assessment must not impose retroactive penalisation to any market party, but provide recommendations for their improvement in the medium-term.**

profile. The 1500 MW is split in two separate segments: 750 MW of immediately interruptible load ('sofort abschaltbare Lasten') and 750 MW of quickly interruptible load (within 15 minutes) ('schnell abschaltbare Lasten')".

⁸ Recent examples are on 14 December 2018 (30 TSO requests, altogether 1627 MW capacity, 1842 MWh energy, 10 hours duration) and on 21 January 2019 (13 TSO requests, altogether 411 MW capacity, 394 MWh energy, 2 hours duration).

⁹ On 29 July 2018, 929 MW prequalified for immediate interruption and 1110 MW prequalified for fast interruption. After 6 months, on 2 February 2019, 933 MW prequalified for immediate interruption and 1320 MW prequalified for fast interruption.

NATIONAL EXAMPLES




The application of the existing Guidelines has not prohibited the establishment of capacity mechanisms which discriminate demand-side measures over supply.

In 2014 the Great Britain (GB)¹⁰ capacity mechanism set an unfortunate precedent. It was the first capacity mechanism notified by a Member State, namely the United Kingdom (UK), under the new provisions in the Environmental and Energy State Aid Guidelines. The Commission approved the design of this capacity mechanism and several other Member States have interpreted it as an endorsement and copied its main feature for their national schemes.

Although the GB capacity mechanism allows DR and innovative flexibility solutions to compete in the auction with supply-side resources as well as forward participation of “unproven Demand-Side Response”, some of the formal barriers to decentralised energy solutions in the UK capacity mechanisms can now also be found in other Member State’s schemes:

- the duration of capacity agreements for demand-side flexibility solutions is limited compared to the one for generators (e.g. 1 year vs 3-15 years). This creates a bias in favour of investing in supply-side options. Just like generation, demand-side response could be offered into the auction at a lower price if it had multi-year price certainty. Offering matching commitment periods for all resources would put an end to this discrimination; most capacity mechanisms worldwide have found that 1 year is enough to incentivise needed supply-side investment;
- the minimum bid size is too high (e.g. above 2 MW) for aggregated loads to participate;
- the lack of a dispatch mechanism and dispatch instructions makes the participation of decentralised energy solutions much more expensive and riskier, as participants must guess when there is a stress event.

The following examples try to clarify how some national capacity mechanisms, authorised by the Commission, have not been fair towards DR and innovative flexibility solutions:

<p>ITALY</p> 	<ul style="list-style-type: none"> • Does not allow demand-side flexibility solutions to compete with supply-side resources, as it cannot earn the clearing price. • Does not allow aggregation. • Does not fully value DR, because it is restricted to participating during typical peak hours and is excessively de-rated on that basis. • Requires all DR sites to give the TSO the ability to trip them directly.
<p>IRELAND</p> 	<ul style="list-style-type: none"> • Capacity agreements for DR are limited to 1 year whereas for generators they can last 3-15 years. • Although aggregation is allowed, it applies a greater de-rating to larger aggregations, seemingly due to a flawed analogy about larger generating units presenting a larger risk. • Allows “Unproven DSR,” but the TSO has a lot of discretion in deciding whether to prequalify such a resource, rather than it being automatic.
<p>FRANCE</p> 	<ul style="list-style-type: none"> • Aims to stimulate the emergence of demand-side flexibility: it allows DR to compete with supply-side resources. • The TSO has introduced new provisions in 2019 specifically targeting DR, “<i>Appel d’Offres Effacements</i>” (approved by DG COMP on 07/02/2018). • Flexible loads can certify capacities later than generation: at least 2 months before delivery year for flexible loads vs more than 3 years for generation. • The minimum bid size is 1 MW, but aggregation is allowed for smaller capacities. • Cross-border participation of foreign capacities is limited by the need to secure interconnectors capacity. • It does not discriminate in favour of generators with regards to contract lengths of only 1 year. Upon request from the Commission, TSO is implementing multi-annual contracts for new capacities (including decentralised energy resources). • Although the capacity certificates can be either for production or load shedding capacities, RTE has decided storage (and vehicle-to-grid) cannot have both, although technically possible¹¹.

¹⁰ It does not include Northern Ireland’s market.

¹¹ However, an ongoing dedicated consultation process of RTE on storage might change this treatment.