



**smartEn**  
Smart Energy Europe

# **Response to consultation on the proposal for a European Resource Adequacy Assessment Methodology**

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## About smartEn - Smart Energy Europe

**smartEn is the European business association integrating the decentralized solutions of the clean energy transition.** We create opportunities for every company, building and car to support an increasingly renewable energy system.

### Our vision:

Every European benefits from playing an active role in the clean energy transition.

### Our mission:

- **Promote system efficiency** through the advanced management and integration of electricity demand and supply in homes and buildings, transportation, businesses and decentralised energy projects.
- **Empower energy users** by enabling them to participate in the energy market through flexible demand, storage, self-generation and the participation in community projects, and giving them control of their energy data.
- **Encourage innovation and diversity** by enabling new market players and service offers that provide attractive choices for consumers and allow for healthy competition.
- **Drive the decarbonisation of the energy sector** through the cost-effective integration of renewable sources and the electrification of heating, cooling and transport.

### smartEn membership



## European Resource Adequacy Assessment Methodology Consultation

smartEn has identified a series of outstanding issues in the current proposal for a European resource adequacy assessment methodology that need to be addressed for a correct implementation of new flexible, digital and decentralized solutions.

### 1. Demand Side Response Potential

smartEn has observed that while the consultation document states *“explicit and implicit DSR shall be considered in the assessment if such technology is considered as available, mature and competitive within the concerned period of the assessment”*, no clear way has been presented as to how this will be achieved. So far, a clear and transparent methodology has not been presented to calculate the present and future potential of DSR. The current proposal depends on the reporting of TSOs to aggregate and calculate the potential of DSR, leaving it to them to decide the methodology to measure this potential. To fully take into consideration the potential of DSR, smartEn recommends a clear and transparent methodology that is applicable on all EU countries.

### 2. Modular model – Lack of EU-wide vision

The current resource adequacy methodology proposal is dependent on each European TSO providing information on the DSR use in their network. This approach might provide a fragmented vision of the actual use of DSR across Europe. To limit this risk, smartEn encourages ENTSO-E to create a clear and transparent methodology, with homogeneous requisites, for TSOs to report data to ENTSO-E in a comparable way. So far no blueprint that includes the data to be reported has been included in the methodology proposal. The objective should be to have a more structured approach on monitoring the existing DSF and its future potential.

### 3. “Mature and Robust technologies”

smartEn acknowledges the need to guarantee system stability and the preference of planning mostly with technologies that are deemed as mature and robust. Nonetheless smartEn thinks that the current process to determine which technologies are considered mature and robust is not very clear, and can easily be biased towards existing generation technologies, leaving innovative solutions like DSR outside of the methodology. If such considerations shall be taken, a transparent argumentation as to what is a robust technology (including KPIs and other technical requirements) should be provided, with a clear timeline to revisit a categorization. Alternatively, smartEn suggests that all technologies able to provide the required service, should be able to do so.

#### 4. Bring green technologies to the forefront

In the creation of the resource adequacy assessment methodology the EU Green Deal and the EU goals for decarbonisation need to be in the forefront. For this reason, technologies like DSR and storage, that facilitate the inclusion of RES in the grid, and are a reliable tool to counteract the increasing variability in a decentralised energy system, should be given a prominent role when assessing the need for new investments in infrastructure.