REstore response to the ICAROS consultation

1. Transfer of energy regime should also be available and applied for redispatching activations

According to the design note on scheduling and redispatching the Transfer of energy regime cannot be applied for redispatching (p10 chapter 4): we would like to underline that activation of a flexibility for balancing or redispatching needs should answer to the same logic in terms of transfer of energy. Having a separate framework for redispatching activations raises concerns regarding the impact on valorization the flexibility of the sites involved:

- two distinct frameworks will coexist for the activation of the flexibility on the same site, leading to increased complexity and lack of consistency.

- the absence of transfer of energy framework for redispatching could lead to difficulties in accessing at all the flexibility of a site for an independent aggregator (no solution in place, collateral risk to not be able to offer balancing bids on the same site).

2. Voluntary intraday scheduling of a site could constitute an interesting material to implement new baseline methodologies for R3 activations

Having the opportunity to generate and use intraday schedules can be an interesting option to widen the scope of methodologies used for baselining and settlement of activations of demand-response in R3: this type of methodologies has been implemented in other countries like in France, and is very well suited for some sites for which the standard baseline method used in R3 does not work.

3. FSP and scheduling agent roles should be distinguished as much as possible, or at least not lead to any irrelevant obligations or complications.

The role of FSPs is to value the flexibility of a site, and not to forecast and follow the power profile of the site: the FSP only ensures that a delta power is available and can be activated when needed. Therefore, the FSP should not be automatically and inevitably be considered as scheduling and outage agent: this has to remain optional.

Also, this can raise issues for sites where the flexibility has not been valued yet and where the supplier could secure its position as scheduling agent, therefore blocking access to an independent aggregator wanting to become FSP afterwards.