

Synergrid reaction to Low Carbon Tender consultation

From a DSO perspective, we would like to raise the following points concerning the design of the Low Carbon Tender:

- The design should clarify that combinations of LV and MV Delivery Points in one CMU will not be supported. This would defeat the purpose of the Virtual CMU as it would require that some LV Delivery Points be treated as MV.
- The design should clarify that LV participation will be at the level of the Access Point (metering requirements should specify a digital meter)
- The metering requirements will further include that the activation of the communication functionalities of the (digital) meter needs to be accepted by the customer (no 'flight mode')
- The design should clarify that the conversion of the Virtual CMU for LV Delivery Points to an existing CMU may include a check of the grid constraints by the affected DSO (through a Network Flexibility Study or NFS)
- The DSOs propose to base the verification of the 'newness' of the capacity for batteries on the notification date towards the DSO (in line with the regional notification requirements)
- The DSOs propose to include the possibility to choose the bid volume also in the CRM design as it will allow taking into account limitations through NFS in the bid
- The design should clarify that secondary market transactions on LCT contracts will be notified to the DSO (to take into account in NFS process)
- As for CRM, an agreement between the LCT candidate and the DSO is required. The design should clarify that this will be the FSP-DSO contract, for which LCT will be treated according to the process and rules defined for CRM