



Suggestions for improved stakeholder engagement in Balancing Pilot Projects

A joint statement by EFET, Eurelectric, Europex and EWEA



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The European Federation of Energy Traders (EFET), Eurelectric, Europex and the European Wind Energy Association (EWEA) have welcomed and are actively involved in the initiative of ENTSO-E and TSOs to run pilot projects to help the design and pre-implementation of the electricity balancing target model, since its inception.

However, stakeholder involvement in the Balancing Pilot Projects remains problematic, despite valuable efforts in some of the projects. Market participants continue to feel that important decisions are being taken without having a proper view on what their impact will be, and without having any influence when different options are being considered.

We urge both TSOs/ENTSO-E and NRAs/ACER to streamline the information towards market participants and involve stakeholders better, and at an earlier stage in the decision-making process. In this regard, we would like to point to the appreciated effort in improving stakeholder involvement in the formulation of the Standard Products, where a dedicated meeting resulted in a better understanding from market participants of the different elements of the proposal, and the possibility to give some early feedback to ENTSO-E. Such early involvement improves the process further down the road and avoids having to backtrack for reasons that could have been signalled much earlier.

To improve stakeholder involvement in the different Balancing Pilot Projects, we ask that the following three elements are tackled:

- **Information towards stakeholders:**

- The standard reporting on the Balancing Pilot Projects is still lacking. Despite efforts from our four associations to better frame the standard reporting, the only slide set that was presented in this regard (BPP SG of March 2015) was incomplete. Such standard reporting should at least include:
 - Key learning points for wider implementation across Europe
 - Key decisions, both upcoming and taken
- Information distribution should be both local and within the BPP SG (or the BSG in the future):
 - Points of wider interest to be communicated to the BPP SG (BSG)
 - Detailed implementation information to be communicated to local stakeholders

- **Involvement of stakeholders:**

- Stakeholder involvement is mostly limited to information distribution during ad-hoc workshops (e.g. IGCC and TERRE). Given the amount of information distributed during such a workshop and the lack of information available beforehand, there is little opportunity for deeper discussion and providing real feedback. For proper involvement, regular meetings with information distributed well beforehand are required.
- In case of key decisions on different design options, stakeholder consultations should be performed. Stakeholders are currently left to the undesirable, negative role of criticising and reversing unfavourable design decisions, instead of constructively discussing the merits of different options.

- **Contact between stakeholders and the Balancing Pilot Projects:**

- The consolidated contact list of TSO / NRA SPOCs should be completed with missing contacts, and an updated version distributed when necessary.
- The presence of one of the SPOCs for each Balancing Pilot Project during the Balancing Stakeholder Group would help discussions and answer questions from stakeholders. Given that there are now only 6 active Balancing Pilot Projects, we feel this would not excessively enlarge the group.
- All BPP SG (BSG) members should be invited to local BPP meetings, and receive the information regarding the BPPs that is distributed in local groups, meetings and workshops. In this regard, the information exchange platform that was to be implemented to distribute information is still not in place.