

ACER's public consultation on all TSOs' proposals to amend the implementation frameworks for exchange of balancing energy with manual frequency restoration reserve activation and automatic frequency restoration reserve activation

Fields marked with * are mandatory.

Introduction

All transmission system operators (TSOs) submitted to The European Union Agency for the Cooperation of Energy Regulators (ACER) on 18 December 2025 their proposals to the amendment of implementation frameworks for the European platforms for the exchange of balancing energy from frequency restoration reserves with automatic and manual activation (hereafter 'the Proposals') in accordance with Article 20(3)(f) and Article 21(3)(f) of Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing ('EB Regulation').

ACER will review these proposals and revise them where necessary, in order to ensure that they are in line with the purpose of the Regulation (EU) 2017/2195 and Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity. ACER may also introduce editorial amendments to improve clarity, conciseness, consistency and readability of the Proposals.

Objective

The objective of this consultation is to gather views and information from stakeholders to inform ACER's decision-making on the Proposals, in accordance with Article 6(10) of Regulation (EU) 2019/942.

Target group

This consultation is addressed to all interested stakeholders, including but not limited to: electricity Transmission System Operators (TSOs), electricity Distribution System Operators (DSOs), investors, network users, producers, suppliers, new market players, exchanges, balancing providers, public authorities, academics, think tanks, environmental groups, civic society and other interested parties.

Contact and deadline

The contact point for this consultation is: ACER-ELE-2025-012@acer.europa.eu

All interested stakeholders are invited to submit their comments by **23 February 2026, 17:00 (CET)**.

Related Documents

- [Regulation \(EU\) 2019/942](#) of the European Parliament and of the Council of 5 June 2019 establishing a European Union Agency for the Cooperation of Energy Regulators ('ACER Regulation').
- [Regulation \(EU\) 2019/943](#) of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (recast) ('Electricity Regulation').
- [Commission Regulation \(EU\) 2017/2195](#) of 23 November 2017 establishing a guideline on electricity balancing ('EB Regulation')
- [Commission Regulation \(EU\) 2017/1485](#) of 2 August 2017 establishing a guideline on electricity transmission system operation ('SO Regulation')
- **Submitted documents by all TSOs:**
 - [TSOs' amendment proposal on the implementation framework for the European platform for the exchange of balancing energy from frequency restoration reserves with automatic activation](#)
 - [TSOs' amendment proposal on the implementation framework for the European platform for the exchange of balancing energy from frequency restoration reserves with manual activation](#)
 - [Explanatory document to all TSOs' Proposals for the harmonisation of terms and conditions for BSPs in accordance with Article 20\(3\)\(f\) and Article 21\(3\)\(f\) of the Commission Regulation \(EU\) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing](#)

Legal Framework

Articles 20(3)(f), and 21(3)(f) of the EB Regulation, require all TSOs to develop proposals to amend the implementation framework for the exchange of balancing energy with manual Frequency Restoration Reserve activation (mFRR IF[1]) and automatic Frequency Restoration Reserve activation (aFRR IF[2]), respectively. In particular these Articles require that the mFRR IF and aFRR IF include a framework for the harmonisation of the terms and conditions (T&Cs) related to balancing in accordance with Article 18 of EB Regulation that requires the TSOs to develop a proposal regarding the terms and conditions for balancing service providers.

Further, Article 20 of the mFRR IF and aFRR IF set out the framework for the harmonisation process of terms and conditions, which requires amending the mFRR IF and aFRR IF to include a common harmonisation proposal. According to Article 20 of the mFRR IF and aFRR IF, this process begins with an annual stakeholder survey[3], which helps to prioritise harmonisation needs. TSOs should then develop harmonisation options for each priority area, in close cooperation with stakeholders and regulatory authorities. These options are subject to a two-month public consultation[4], after which the TSOs should assess the feedback and prepare a common harmonisation proposal, including a timeline for implementation. Finally, the mFRR IF and aFRR IF

should then be amended in line with Article 6(3) of the EB Regulation.

The TSOs have taken the above-mentioned process and have submitted all TSOs' proposals for amendment of the mFRR IF and aFRR IF to ACER on 18 December 2025 with the aim of harmonising the T&Cs for BSPs pursuant to Article 18 of the EB Regulation including the common harmonisation proposal (hereafter 'the Annexes of the Proposals'). In the Proposals, all TSOs propose to harmonise the rules on the following six topics.

English publication of T&Cs; permission of English communication between TSOs and BSPs; harmonisation of FRR prequalification process; switching of reserve providing units (RPU) and reserve providing groups (RPG) between BSPs; re-prequalification; and data exchange standards.

The Proposals should align with the specific requirements and objectives set out in the EB Regulation (Article 3 (1), Article 20 3(f), and Article 21 3(f)), the Electricity Directive (Article 40), and the SO Regulation (Articles 158 and 159).

[1] ACER Decision No 14/2022 of 30 September 2022 on the implementation framework for a European platform for the exchange of balancing energy from frequency restoration reserves with manual activation: Annex II.

[2] ACER Decision No 08/2024 of 5 July 2024 on the amendments to the implementation framework for a European platform for the exchange of balancing energy from frequency restoration reserves with automatic activation: Annex I.

[3] On 15 May 2023 all TSOs launched the first survey (available at: https://consultations.entsoe.eu/markets/if_survey/) asking stakeholders for input to evaluate the terms and conditions for Balancing Service Providers to identify possible harmonisation needs in the European balancing market. This was followed by a second survey in 2024 (available at: https://consultations.entsoe.eu/markets/if_survey_2024/).

[4] All TSOs' public consultation on identified harmonisation options concerning terms and conditions related to the aFRR and mFRR Platforms, available at: <https://consultations.entsoe.eu/markets/public-consultation-on-if-amendments/>

Data Protection

ACER will process personal data of the respondents in accordance with [Regulation \(EU\) 2018/1725](#), taking into account that this processing is necessary for performing ACER's consultation tasks.

More information on data protection is available in ACER's [data protection notice](#) and on [ACER's website](#).

ACER will not publish personal data.

Please confirm that you have read [the Data Protection Notice](#)

Confidentiality

Following this consultation, ACER will make public:

- the number of responses received;
- company names, unless they should be considered as confidential;
- all non-confidential responses; and
- ACER's evaluation of responses. In the evaluation, ACER may link responses to specific respondents or groups of respondents.

You may request that the name of your company or any information provided in your response is treated as confidential. To this aim, you need to explicitly indicate whether your response contains confidential information.

You will be asked this question at the end of the survey.

I have read the information provided in this section.

How To Navigate Through The Survey

When providing your input to the questionnaire, please consider the following guidance:

Definitions and Clarifications

For the purposes of this public consultation, the following terms are used throughout the text:

'the Proposals': All TSOs' proposals to the amendment of implementation frameworks for the European platforms for the exchange of balancing energy from frequency restoration reserves with automatic and manual activation.

'the Annexes of the Proposals': All TSOs' common harmonisation proposals included as Annex 1 to the Proposals.

'mFRR IF': the implementation framework for the exchange of balancing energy with manual Frequency Restoration Reserve activation. (ACER Decision No 14/2022 of 30 September 2022 on the implementation framework for a European platform for the exchange of balancing energy from frequency restoration reserves with manual activation: Annex II.)

'aFRR IF': the implementation framework for the exchange of balancing energy with automatic Frequency Restoration Reserve activation. (ACER Decision No 08/2024 of 5 July 2024 on the amendments to the implementation framework for a European platform for the exchange of balancing energy from frequency restoration reserves with automatic activation: Annex I.)

For the purpose of this public consultation, the following definitions from the [Annex 1 to the Implementation framework for the European platform for the exchange of balancing energy from frequency restoration reserves with automatic activation](#) and with [manual activations](#):

'Activation test' means a test whereby the reserve connecting TSO sends an activation signal to ensure that the RPU or RPG is capable of being activated and meets the product requirements.

'Ex-post verification' means the evaluation by the reserve connecting TSO of the ability of a RPU or RPG to provide the relevant service based on the monitoring activities according to the Article 158(5) of the SO Regulation.

'Re-qualification' means the reassessment of qualification as defined in Article 159(6) of the SO Regulation, if at least one of the conditions of Article 10 (1) is met.

'Controllable unit' or 'CU' means a single power-generating module and/or demand unit or an energy storage module, when these units or an ensemble of these units are located behind the same (metering) point and these units are commonly controlled.

'RPU' means a reserve providing unit as defined in Article 3(2)(10) of SO Regulation.

'RPG' means a reserve providing group as defined in Article 3(2)(11) of SO Regulation.

For definitions of further terms please see Article 2 of [Annex 1 to the Implementation framework for the European platform for the exchange of balancing energy from frequency restoration reserves with automatic activation](#) and with [manual activations](#).

Providing Comprehensive Feedback

Please support your responses with arguments. ACER's final assessment will be based on the provided reasoning, helping us to better understand the current market needs.

Need Assistance?

We appreciate your participation and effort in this consultation. If you have any questions or require assistance, please contact our team.

Your detailed and well-reasoned feedback is crucial for us to accurately assess the market's needs. Thank you for your valuable contribution.

Respondent's Data

* Country

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- Iceland
- Norway
- Switzerland
- United Kingdom
- Other

* Company's name

50 character(s) maximum

* Email address

This information will not be published.

* Area of business

- Energy supplier
- Utility Company (or association)
- Trader (or association)
- Aggregator (or association)
- Generator (or association)
- End-user (or association)
- Market operator (or association)
- Distribution network operator (or association)
- Transmission network operator (or association)
- Regulatory authority
- Academia (or association)
- Other (please specify)

If relevant, please specify other area of business

Consultation Topics and Questions

Topic 1: Frequency of stakeholder survey

According to Article 20(2)(a) of the mFRR IF and aFRR IF, the stakeholder survey to identify a shortlist of prioritised harmonisation needs should be organised every year. In Article 20(2)(a) of the Proposals, the TSOs propose that a stakeholder survey should be organised every three years.

ACER considers that conducting the stakeholder survey every three years could result in delays in the further harmonisation process. Therefore, ACER intends to revise Article 20 of the Proposals in order to reduce the interval of the stakeholder survey from every three years to every two years. This approach would reduce the time gap between the identification of the stakeholder needs and thereby improving responsiveness and efficiency in the harmonisation process.

1.1 Do you agree with ACER's proposed modification to reduce the frequency of the stakeholder survey to every two years?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

1.2 Please provide an explanation for your answer above.

1500 character(s) maximum

Topic 2: Proportionality of the prequalification process

The prequalification was originally designed for large generation units, where the process, although time-consuming and complex, had a relatively limited impact due to their size and available resources. However, today the system is more decentralised, with many smaller units participating in the market. For these smaller units, applying the same prequalification process becomes disproportionately burdensome and costly. Therefore, applying the exact same prequalification framework may no longer fit today's reality. At the same time, cross-border exchange of balancing products is increasing due to the development of more integrated European balancing markets. This further reinforces the need for a level playing field for BSPs across Member States to avoid BSPs in one country undergo a more complex prequalification process than BSPs in another country, while they are providing the exact same product.

Therefore, ACER believes it is important to ensure a simplified and streamlined process for all units but in particular for small, identical or standardised units with requirements and conditions that are proportionate with the real impact these units may cause on the system security and network operation in case of non-delivery.

2.1 Do you agree that the prequalification process proposed by TSOs is sufficiently proportionate and inclusive for all types of market participants?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

2.2 Please provide an explanation for your answer above.

1500 character(s) maximum

Topic 3: Level of harmonisation

ACER observes that the Proposals still contain several Articles that refer to national terms and conditions for the specification of certain requirements. These include the conditions for performing ex-post verification under Article 6 of the Annexes of the Proposals, certain application submission requirements under Article 7 of the Annexes of the Proposals, conditions for switching RPU from one BSP to another while retaining their prequalification status under Article 8 of the Annexes of the Proposals, as well as conditions related to re-prequalification and termination processes under Articles 9, 10, and 11 of the Annexes of the Proposals.

ACER considers that the overall objective of the Proposals to amend the FRR IFs should be to harmonise prequalification and ex-post verification processes across Member States, thereby, among other objectives, creating a level playing field for all BSPs and contributing to the achievement of the objectives of the Electricity Regulation.

3.1. Do you agree that the current level of harmonisation in the Proposals fulfils the requirements for harmonising FRR prequalification and ex-post verification processes in order to provide a level playing field for all BSPs across Member States in an integrated European balancing market?

- Fully agree
- Partially agree
- Partially disagree
- Disagree
- No opinion

3.2 Please provide an explanation for your answer above.

1500 character(s) maximum

Topic 4: FRR prequalification process

In Article 5(2) of the Annexes of the Proposals, the timeline for the FRR prequalification process proposed by the TSOs is based on the maximum permissible durations established under Article 159 of the SO Regulation; according to Article 159(3) of the SO Regulation: “...Within 8 weeks from receipt of the application, the reserve connecting TSO or the designated TSO shall confirm whether the application is complete. Where the reserve connecting TSO or the designated TSO considers that the application is incomplete they shall request additional information and the potential FRR provider shall submit the additional required information within 4 weeks from the receipt of the request..” , and according to Article 159(4) of the SO Regulation “Within 3 months after the reserve connecting TSO or the designated TSO confirms that the application is complete, the reserve connecting TSO or the designated TSO shall evaluate the information provided and decide whether the potential FRR providing units or FRR providing groups meet the criteria for a FRR prequalification. The reserve connecting TSO or the designated TSO shall notify their decision to the potential FRR provider.”

According to Article 5(2)(b) of the Annexes of the Proposals, the timeline for the “Confirmation of application” should be complete within four weeks of its submission, however, in exceptional cases, the reserve connecting TSO may extend the confirmation process up to a maximum of eight weeks in accordance with Article 159 of the SO Regulation.

According to Article 5(2)(b) of the Annexes of the Proposals, the timeline for the technical evaluation is within three months after the reserve connecting TSO confirms the completion of the application. According to Article 5(4) of the Annexes of the Proposals, in the event of a negative result of the technical evaluation, the reserve connecting TSO may grant an extension to the BSP to repeat the activation test. The BSP shall submit the requested supplementary information or perform the repeated activation test requested within four weeks. The

reserve connecting TSO shall assess the supplementary information or/and the requested activation test within four weeks following its receipt.

According to Article 5(3) of the Annexes of the Proposals, if there are missing information provided under any of the prequalification steps, or the provided information is rejected by the reserve connecting TSO, the BSP is required to submit additional or corrected information within four weeks in accordance with Article 159(3) of the SO Regulation and the reserve connecting TSO shall assess within four weeks the updated application.

Finally, according to Article 5(4) of the Annexes of the Proposals, the total duration of the prequalification process shall not exceed nine months from the date of submission of the FRR prequalification application.

While these deadlines reflect the upper limits allowed by the Regulation, ACER considers the proposed timeline to be too long, with the potential to adversely affect the business case for prospective BSPs, in particular when aggregating small, identical or standardised units that may face greater and unnecessary administrative and financial burdens during prequalification. With the increasing participation of smaller and decentralised units in the market, applying the same prequalification process as used for large generation units can be more burdensome, particularly given their limited size and capacity.

ACER observes that some TSOs have already implemented shorter intermediate deadlines[1]. In cases where a BSP can demonstrate that all units exhibit identical technical capabilities and operational behaviour, it may be sufficient to conduct prequalification measurements on only a portion of the total capacity or on a representative subset of units since this good practice is already implemented in certain Member States, such as Denmark[2], Finland or the Netherlands[3].

Nevertheless, ACER acknowledges that any reduction in procedural timeframes must strike a careful balance between maintaining the security and reliability of balancing services for system operators and ensuring fair, timely access for service providers. It is essential that the timeline does not jeopardise the system operator's ability to assess operational risks, while at the same time avoiding undue delays that could deter or disadvantage potential balancing providers.

In light of these considerations, ACER intends to explore the feasibility of introducing proportionate exemptions or streamlined procedures for RPU or RPGs with small, identical and standardised units, in order to protect such participants from disproportionately long waiting periods and ensure fair and non-discriminatory access to the FRR prequalification process.

[1] 2023 ACER Market Monitoring report on Demand response and other distributed energy resources: what barriers are holding them back?, available at: https://www.acer.europa.eu/sites/default/files/documents/Publications/ACER_MMR_2023_Barriers_to_demand_response.pdf

[2] 2024 Energinet report on Prequalification of Units and aggregated portfolios, available at: <https://energinet.dk/media/ox0gqmvw/gaeldende-prequalification-of-units-and-aggregated-portfolios.pdf>

[3]. [3] 2021 ACER Wholesale Electricity Market Monitoring report on prequalification processes for the provision of balancing services, available at: https://www.acer.europa.eu/sites/default/files/documents/Publications/ACER_Prequalification_BAL_Services.pdf

4.1 Do you agree that the FRR prequalification process proposed by the TSOs is compatible with all types of market participants features?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

4.2 Please provide an explanation for your answer above.

1500 character(s) maximum

4.3 Do you agree that the timeline for the FRR prequalification process proposed by the TSOs in Article 5 of the Annexes to the Proposals is excessively long?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

4.4 In case your answer to Question 4.3 is “Fully agree” or “Partially agree” or “Partially disagree”, could you propose a specific timeline or deadline for different phases of the prequalification process as outlined in Article 5(2)(b) (timeline for ‘Confirmation of application’), Article 5(2)(c) (timeline for ‘Technical evaluation’), Article 5(3) (timeline in case of incorrect and missing information) and Article 5(4) (timeline in case of negative results)?

1500 character(s) maximum

4.5 Do you agree with ACER that the timeline and steps required to complete the prequalification process, as outlined in Article 5 of the Annexes to the Proposals, are excessively long and not fully compatible with small, identical, and standardised units?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

4.6 If your answer to Question 4.5 is “Fully agree” or “Partially agree” or “Partially disagree”, could you propose a specific timeline or deadline, and indicate which phases of the prequalification process should be included or excluded, as set out in Article 5 of the Annexes of the Proposals?

1500 character(s) maximum

4.7 Do you agree with ACER that the timeline in the event of a negative result of the technical evaluation proposed by the TSOs in Article 5(4) of the Annexes to the Proposals should be shorter than the general FRR prequalification process?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

4.8 Please provide an explanation for your answer above.

1500 character(s) maximum

Topic 5: Prequalification with activation test and ex-post verification process

According to Article 6 of the Annexes to the Proposals, prequalification with an activation test is considered the standard process for the prequalification of an RPU or RPG. However, the reserve connecting TSO may apply ex-post verification as an alternative to the activation test. The conditions under which the TSO may allow ex-post verification for RPUs, or RPGs are listed in Article 6(3) of the Annexes to the Proposals.

The ex-post verification process is primarily intended to demonstrate the actual performance of an RPU or RPG through market participation. Therefore, if the system security conditions described in Article 6 of the Annexes to the Proposals are fulfilled, ex-post verification can help RPUs and RPGs, particularly small units, avoid a lengthy prequalification process involving activation tests, thereby enabling quicker access to the markets. Therefore, ACER considers ex-post verification to be on an equal footing with prequalification and views it as an alternative prequalification process.

5.1 Do you agree with ACER that ex-post verification should be considered an alternative to prequalification with an activation test, provided that the conditions required to ensure system security are fulfilled?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

5.2 Please provide an explanation for your answer above.

1500 character(s) maximum

5.3 Do you agree that Article 6 of the Annexes of the Proposals correctly defines the conditions for RPUs and RPGs to carry out ex-post verification?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

5.4 Please provide an explanation for your answer above.

1500 character(s) maximum

5.5 Do you agree with the steps and timeline of the ex-post verification process proposed by the TSOs in Article 6 of the Annexes of the Proposals?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

5.6 Please provide an explanation for your answer above.

1500 character(s) maximum

Topic 6: Granularity of information requirements

ACER observes that certain data elements listed for the application submission requirements in Article 7 of the Annexes of the Proposals appear to be relevant at the RPU or RPG level rather than at the controllable unit level and considers that the level of detail currently required at the controllable unit level may be excessive.

6.1 Do you agree with the current level of detail in the application submission requirements proposed by TSOs in Article 7 of the Annexes of the Proposals?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

6.2 Please provide an explanation for your answer above.

1500 character(s) maximum

Topic 7: Switching of Reserve Providing Units (RPUs) between BSPs

Article 8 of the Annexes of the Proposals outlines the prequalification for the switching of the RPUs between the BSPs. Article 8(a) of the Annexes of the Proposals includes the conditions under which RPUs may retain their prequalification status when switching between BSPs. This article also allows TSOs to perform an ex-post verification of the BSP's newly added RPU. Article 6(3)(a) of the Annexes of the Proposals also states that the reserve connecting TSO may allow for ex-post verification for the switching of RPUs between BSPs according to Article 8(1) of the Annexes of the Proposals. The timeline for switching of RPUs between BSPs is also included in Article 8(6) of the Annexes of the Proposals.

In case of non-fulfilment of the conditions for retain the prequalification status, the new BSP and the reserve connecting TSO, should decide whether a prequalification process with activation test or ex-post verification is necessary. Further requirements for the communication test and validity periods under switching of the RPUs between BSPs are outlined in Article 8 of the of the Annexes of the Proposals.

7.1 Do you agree with the requirements and conditions and timeline of switching RPUs between BSPs proposed by the TSOs in Article 8 of the Annexes of the Proposals?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

7.2 Please provide an explanation for your answer above.

1500 character(s) maximum

7.3 Do you agree that the scope of Article 8 of the Annexes of the Proposals should be limited to switching RPUs and not RPGs between BSPs?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

7.4 Please provide an explanation for your answer above.

1500 character(s) maximum

7.5 Do you agree with the level of harmonisation for the ex-post verification for the switching of RPU between BSPs as outlined in Article 6(3)(a) and Article 8(1) of the Annexes of the Proposals?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

7.6 Please provide an explanation for your answer above.

1500 character(s) maximum

Topic 8: Re-prequalification process and conditions

Articles 9 and 10 of the Annexes of the Proposals outline the re-prequalification process and the conditions, respectively. In Articles 9(1) and 9(2) of the Annexes of the Proposals, subject to the applicable national T&Cs for BSPs, the BSP shall inform the reserve connecting TSO no later than six weeks before the planned implementation date of any changes pursuant to Article 10(1) of the Annexes of the Proposals to their RPU or RPG via the reserve connecting TSO communication interface. Subject to the applicable national T&Cs for BSPs, the reserve connecting TSO shall within four weeks of receiving the notification pursuant to Article 9(1) of the Annexes of the Proposals, assess whether a re-prequalification on RPU or RPG level pursuant to Article 10(1) of the Annexes of the Proposals is required.

ACER acknowledges that the TSOs have provided an explanation regarding the ex-post verification for re-prequalification in Article 6(3)(c) of the Annexes of the Proposals, according to which the reserve connecting TSO may allow for ex-post verification for RPU or RPGs in case of re-prequalifying at the end of the validity period in accordance with Article 10(1)(d) of the Annexes of the Proposals. However, ACER observes that it is not fully clear from Article 10 of the Annexes of the Proposals whether for an RPU or RPG undergoing re-prequalification it is required to repeat all steps from the initial prequalification procedure. This creates uncertainty for market participants and may lead to inconsistent implementation across TSOs. Therefore, ACER sees the need for more clarity: whether and which steps should be repeated in the case of re-prequalification and clearly distinguish the timeline and steps for first-time prequalification and re-prequalification.

8.1 Do you agree with the proposed timeline for re-prequalification by TSOs in Article 9(1) and 9(2) of the Annexes of the Proposals?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

8.2 Please provide an explanation for your answer above.

1500 character(s) maximum

8.3 Do you agree with the proposed conditions by the TSOs to request re-qualification in Article 10(1) of the Annexes of the Proposals?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

8.4 Please provide an explanation for your answer above.

1500 character(s) maximum

8.5 Do you agree with the level of harmonisation for the ex-post verification for the re-qualification in Article 6(3)(c) and Article 10(1)(d) of the Annexes of the Proposals?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

8.6 Please provide an explanation for your answer above.

1500 character(s) maximum

8.7 Do you agree with ACER that, it is unclear whether re-qualification for RPU or RPGs should include all the steps of the prequalification process as outlined in Article 5 of the Annexes to the Proposals?

- Fully agree
- Partially agree
- Partially disagree
- Fully disagree
- No opinion

8.8 If your answer to Question 8.7 is “Fully agree” or “Partially agree” or “Partially disagree”, please specify under which conditions re-qualification for RPU or RPGs should require a full prequalification process or a partial prequalification process. Please also indicate which steps of the prequalification process, as outlined in Article 5 of the Annexes to the Proposals, should be included or excluded.

1500 character(s) maximum

Topic 9: Other comments

If you would like to comment on other topics, please indicate clearly the related Article and paragraph of the Proposals and add a sufficient explanation.

1500 character(s) maximum

Confidentiality Question

* Does your response contain confidential information?

- Yes.
- No.

If your response contains confidential information, you have to claim confidentiality according to Article 9 of [AC ER's Rules of Procedure](#).

How to do it:

1. download a PDF version of your response (see upper right corner of the page);
2. redact confidential information and provide descriptions* of the deleted information (e.g. use a PDF editor or print out your response and manually replace confidential information with descriptions);
3. upload the redacted (i.e. non-confidential) version of your response;
4. upload a separate document where you:
 - clearly identify which persons/undertakings should not have access to the deleted information;
 - provide reasons why the persons/undertakings should not have access to the information;

* Your descriptions of the deleted information must enable any party concerned with access to the file to determine whether:

- the information deleted is likely to be relevant to their defence; and
- there are sufficient grounds to request ACER to grant access to the information claimed to be confidential.

Please upload a redacted (i.e. non-confidential) version of your response:

The maximum file size is 1 MB. If your file is bigger, please send it to PPA.assessment@acer.europa.eu

Please upload a separate document with the information listed in point 4 above:

The maximum file size is 1 MB. If your file is bigger, please send it to PPA.assessment@acer.europa.eu

ACER will assess your confidentiality claim(s) in accordance with Article 9 of [ACER's Rules of Procedure](#).

If you do not comply with the above requirements, we may:

- assume that your answers do not contain confidential information and that you have no objections to the disclosure of your response in its entirety; or
- disregard your entire response because of non-compliance with the procedural requirements for confidentiality claims.

I have read the information provided in this section and Article 9 of [ACER's Rules of Procedure](#).

Free Text Question