



Storage and Regulated Entities

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In the Clean Energy Package, storage ownership should be a default competitive activity

- Ownership of storage facilities (Elec. Dir. Art. 36)

Storage is a competitive activity and hence, not for DSO ownership (given that DSOs are neutral market facilitators) except for minor exceptions approved by the NRA. As a general principle CEER advocates keeping the scope for exemptions as small as possible, and under effective regulatory oversight.

- New activities of distribution system operators (Elec. Dir. Art. 36a – EP)

In a fast-changing environment, new activities less developed today or not yet foreseen but presenting challenges comparable to storage and Electric Vehicle charging infrastructures could have to be dealt with in the medium term. This additional article aims at providing a general framework to cover this eventuality in a stable legislative framework.

- Ownership of storage and provision of ancillary services by transmission system operators (Elec. Dir. Art. 54)

Align provisions on storage for TSOs with those of DSOs.



Case: Storage

•Storage: part of flexibility services

- Offers services relevant for (1) grid operators and (2) market
- GOs would not be allowed to enter or deter competition
- Ownership for local short-term control of the distribution system where there is no influence on energy and non-frequency ancillary services markets, and where the NRA has granted its approval (EP)
- A comprehensive set of conditions for exemptions

