

Sympower contribution to the RAAE Public Consultation regarding the proposal of ADMIE S.A. to Amend the Reference Load Calculation Methodology Regarding the Participation of Demand Response Load Distributed Portfolios in the Day-Ahead Market and the Intraday Market

Sympower is a flexibility service provider that helps customers adapt successfully towards the energy transition. By combining proprietary software and hardware, we provide an end-to-end solution that offers real-time monitoring and balancing of electricity supply and demand. Our software platform manages over 1,5 GW of flexible distributed energy resources in 10+ countries (Sweden, Finland, Norway, Denmark, Netherlands, Poland, Hungary, Czechia, Greece and Italy). We operate in the Greek balancing market with 70MW of demand-side assets.

First of all, we would like to express our contentment for having Greece opening its wholesale market to Demand Response and plan for a specific baselining method.

You will find below a list of questions and comments we have, regarding the methodology proposed by RAAE:

Questions:

- It is stated that in case an activation occurs following combined orders of the market schedule and reserve activation at the same PTUs, the average X/Y applies for the whole activation. It is not clear what happens if, for example, a portfolio has market schedule up direction and receives mfrd down (i.e a balancing market) activation at the same time, which is something possible. Could you clarify how the articulation between wholesale and balancing markets works? Example: in the same PTU we sell 5 MW Up in wholesale and on that PTU I receive a down activation for 3MW
- What happens if a Market Schedule Instruction and a balancing one happens one right after the other?
- Are there any price limits in the DOWN direction ? (referring to the limitations of down direction in the balancing market)