

OPINION No 03/2025
OF THE EUROPEAN UNION AGENCY
FOR THE COOPERATION OF ENERGY REGULATORS

of 16 April 2025

**on the first amendment of the ENTSO-E Monitoring Plan
in accordance with Article 63(2) of Commission Regulation (EU) 2017/2195
of 23 November 2017 establishing a Guideline on Electricity Balancing**

THE EUROPEAN UNION AGENCY FOR THE COOPERATION OF ENERGY
REGULATORS,

Having regard to 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 Regulators¹, and, in particular, Article 4(2) thereof,

Having regard to Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing ('EB Regulation') and, in particular, Article 63(2) thereof,

Having regard to the favourable opinion of the Board of Regulators of 2 April 2025, delivered pursuant to Article 22(5) of Regulation (EU) 2019/942,

Whereas:

1. INTRODUCTION

- (1) In accordance with Article 63(1) of the EB Regulation, ENTSO-E shall monitor the implementation of the EB Regulation. This monitoring shall cover at least the preparation of the European report in accordance with Article 59 of the EB Regulation and the preparation of a report on monitoring of the implementation of the EB Regulation including the effect on the harmonisation of applicable rules aimed at facilitating market integration².
- (2) In accordance with Article 63(2) of the EB Regulation, ENTSO-E shall submit a monitoring plan on the reports to be prepared and any updates to ACER for an opinion

¹ OJ L158, 14.6.2019, p. 22.

² In its first Opinion 12/2019, ACER already agreed with the approach to merge the two reports into a single report.

by six months after entry into force of the EB Regulation. ENTSO-E submitted the first Monitoring Plan on 6 June 2018. ACER issued its first Opinion 12/2019³ on the Balancing Monitoring plan on 20 May 2019.

- (3) On 10 December 2024, ENTSO-E submitted to ACER for an opinion the First amendment of ENTSO-E Monitoring Plan in accordance with Article 63(2) of the EB Regulation ('Amendment'). Article 63(2) does not specify a clear timeline for ACER to issue this opinion.

2. SUMMARY OF THE AMENDMENT

- (4) The Amendment consists of the following main chapters:
- a. Introduction;
 - b. General overview of the reporting obligations pursuant to the EB Regulation;
 - c. Reporting obligations from the Terms, Conditions and Methodologies ('TCMs') stemming from the EB Regulation; and
two Annexes:
 - d. Annex 1 – Detailed description of the EB Regulation- related reporting.
 - e. Annex 2 – Scope: List of Countries.

3. ACER'S ASSESSMENT OF THE AMENDMENT

3.1. General comments on the Amendment

- (5) Chapter 2 of the Amendment lists the reporting obligations pursuant to the EB Regulation, including the first submission date and the frequency of future submissions. Annex I of the Amendment provides a detailed description of what these reports need to contain in accordance with the EB Regulation.
- (6) Since the submission of the initial Monitoring Plan by ENTSO-E, several decisions on Methodologies in accordance with the EB Regulation have been taken, which required TSOs to further develop analyses on certain aspects of the balancing markets and submit additional reports to ACER. Methodologies containing such provisions are listed in Chapter 3 of the Amendment, and these are the following:
- Implementation Framework for a European platform for the imbalance netting process (IN IF⁴);

³ [ACER Opinion 12-2019 on the ENTSO-E Balancing Monitoring Plan.pdf](#)

⁴ [Annex I of ACER Decision 13/2020](#) on the IN IF, amended by [ACER Decision 16/2022](#)

- Implementation framework for the European platform for the exchange of balancing energy from frequency restoration reserves with automatic activation (aFRR IF⁵);
- Implementation framework for the European platform for the exchange of balancing energy from frequency restoration reserves with manual activation (mFRR IF⁶);
- Implementation framework for the European platform for the exchange of balancing energy from replacement reserves (RR IF);
- Pricing Methodology⁷
- Harmonised Cross-zonal capacity allocation Methodology⁸
- Imbalance Settlement Harmonisation Methodology⁹

(7) ACER considers that all the required reports from the EB Regulation and the Methodologies stemming from the EB Regulation, timings and their frequency of publication have been correctly listed in the Amendment. However, the description of the scope of some of the reports could be improved. For example, the European report on the integration of balancing markets in accordance with Article 59 of the EB Regulation needs to contain all the elements listed down in Article 59(3) of the EB Regulation, and not only those listed in the Amendment.

3.2. Comments related to the reports pursuant to the EB Regulation Methodologies

(8) ACER acknowledges that the deadline for submitting certain reports is approaching. These deadlines were introduced based on the assumption that all or most of the TSOs would be connected to the European platforms for the exchange of balancing energy within 24 months after the legal deadline, which was July 2022 or at the latest before the 2-year maximum derogation deadline which was in July 2024. Given that the derogation deadline has passed, and only a number of TSOs are currently connected to the Platforms, ACER agrees that TSOs may take additional time to issue some of the reports.

⁵ [Annex I of ACER Decision 02/2020](#) on the aFRR IF, amended by [ACER Decision 15/2022](#), and [ACER Decision 08/2024](#)

⁶ [Annex I of ACER Decision 03/2020](#) on the mFRR IF, amended by [ACER Decision 14/2022](#)

⁷ [Annex I of ACER Decision 01/2020](#), amended by [ACER Decision 03/2022](#), and [ACER Decision 09/2024](#)

⁸ [Annex I of ACER Decision 11/2023](#), amended by [ACER Decision 01/2025](#)

⁹ [Annex I of ACER Decision 18/2020](#)

- (9) ACER’s proposal to adjust the timings of certain reports and incorporate them into the European Report in accordance with Article 59 of the EB Regulation is summarized in Table 1 below.

Table 1 The list of ENTSO-E reports from the Methodologies from the EB Regulation and ACER's proposal for new timelines and inclusion in the European report in accordance with Article 59 of the EB Regulation

Methodology	Article	Topic	First submission	Frequency	ACER’s proposal for the new timing	To be added as part of the European report in accordance with Article 59 of the EB Regulation
IFs	Article 5(4) of the aFRR and mFRR IF	Accession roadmaps of the European balancing platforms	Apr-20	Every 6 months	ACER encourages ENTSO-E to publish more frequent accession roadmaps if needed.	No
IFs	Article 21(3) of the aFRR and mFRR IF, Article 19(3) of IN IF	Publication of the algorithm description	Apr-22	One month before go-live of the respective platform and further updated if necessary	No	No
IFs	Article 13(1) of the aFRR IF and mFRR IF	European balancing platforms’ implementation and operation monitoring report	Feb-24/May-24	Yearly	No	Yes
IFs	Article 15 of the aFRR and mFRR IF, Article 11 of the IN IF	Annual work programme of the European balancing platforms	Sep-23	Yearly	No	No
IFs	Article 13(7) of the aFRR and mFRR IF	Efficiency and effectiveness assessment of the European balancing platforms	After the implementation of the Capacity management Function (CMF)	Bi-yearly	Jul-26	Yes
IFs	Article 13(3) of the aFRR IF	Comparison of alternative control models	24 months after implementation deadline of aFRR platform	Only one submission required	Jul-26	Yes

		for aFRR platform				
IFs	Article 13(3) of the mFRR IF	Evaluation of the impact of scheduled counter-activations at mFRR platform	36 months after implementation deadline of mFRR platform	Only one submission required	Jul-27	Yes
Pricing Methodology	Article 11(3)	All TSOs Quarterly report on the pricing of balancing energy and cross-border capacity	7-Dec-22	Quarterly	The report is required to be submitted only until the transitional period expires (until 24-Jul-26)	No
Pricing Methodology	Article 11(4)	All TSOs price incident reports on price spikes at the European platforms	Jun-22	Incident-based	The report is required to be submitted only until the transitional period expires (until 24-Jul-26)	No
Pricing Methodology	Article 11(5)	All TSOs long-term assessment of the functioning of the European balancing markets	36 months after the implementation deadline of the European balancing platforms	Only one submission required	No ¹⁰	No
Pricing Methodology	Article 10(8)	TSOs reassessment of the harmonised maximum and minimum balancing energy prices to the so-called “price limits”, and consultation with stakeholders in forums	Latest 24 months after the implementation deadline of the European balancing platforms	Every two years, under the European Report in accordance with Article 59(2)(a) of the EB Regulation	Not needed	Not applicable
HCZCAM	Article 26(12)	All TSOs cross-zonal capacity welfare report	14 months after implementation of Cross-Zonal Capacity Allocation	Yearly	No	Yes

¹⁰ ACER considers this deliverable has already been fulfilled by the TSOs in the TSO proposal for the 2nd amendment to the Pricing Methodology

			Optimisation Function Software (CZCAOF) software			
ISH	Article 12(3)	Assessment of the need for further harmonisation of the imbalance settlement	24 months after the implementation deadline of the European Platforms	Only one submission required	Initial report to be submitted by Jul-26 and final report submitted to ACER and NRAs by Jul-27	Yes for the initial report

(10) ACER encourages ENTSO-E, should any additional synergies be identified, to propose simplifications to ACER to streamline and reduce reporting obligations without the need to submit another amendment to the Monitoring Plan. In this regard, ACER welcomes the collaboration between ENTSO-E and ACER to simplify the reporting process once the Methodologies containing reporting requirements are submitted for amendments.

(11) Given that ACER proposed that the submission of certain reports is postponed until the majority or all TSOs are connected to the European platforms and sufficient operational data is available to conduct the required analyses, ACER urges ENTSO-E to shift its focus in the meantime from the monitoring activities toward improving the quality of the balancing data required to be published in accordance with Article 17 of Regulation (EU) No 543/2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council the Transparency regulation ¹¹ ('Transparency Regulation), Article 12 of the EB Regulation and Articles stemming from the EB Regulation Methodologies. This would enable all relevant stakeholders, including NRAs and ACER, to conduct their own analyses and monitoring more effectively.

3.3. Alignment of reporting periods of all reporting obligations

(12) In its Chapter 3, ENTSO-E proposes to further align the covered period of all reporting obligations to correspond to a calendar year from 1 January to 31 December.

(13) ACER welcomes this proposal, as aligning all reporting obligations to a calendar year enhances simplicity and clarity by ensuring consistency across reporting periods and making the comparison and analysis of data easier.

¹¹ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:163:0001:0012:EN:PDF>

4. CONCLUSION

- (14) ACER considers that the updated Monitoring Plan fulfils the requirements from the EB Regulation, since it provides a list of the reports that need to be published by ENTSO-E stemming from the EB Regulation, as well as from the respective Methodologies pursuant to the EB Regulation, and contains timelines, frequency and description of the reporting content. ACER notes that certain elements of the updated Monitoring plan such as the description of the content of some of the reports could be further improved.
- (15) ACER acknowledges that the high number of required reports may place significant burden on ENTSO-E's resources and potentially divert attention from other priority tasks. Therefore ACER,

HAS ADOPTED THIS OPINION:

1. Considering the significant delays in some TSOs' accessions to the EB Platforms, ACER acknowledges the need for additional time to produce certain reports. Therefore, ACER recommends that ENTSO-E adopts alternative timelines for their publication. ACER expects that these alternative timelines are formally proposed to ACER once the respective Methodologies are submitted for amendments.
2. ACER recommends that ENTSO-E, in the meantime, prioritise improving the quality of balancing data published on the ENTSO-E Transparency Platform to ensure that stakeholders, NRAs, and ACER can effectively conduct their respective monitoring and analyses. ACER expects ENTSO-E to commence this work without delay.
3. ACER recommends that ENTSO-E promptly notifies ACER upon identifying synergies between reporting obligations, without the need to resubmit the amended Monitoring Plan. This will facilitate more timely discussions and the implementation of the most effective solutions.
4. ACER recommends that ENTSO-E and ACER collaborate to progressively reduce the number of reports that need to be published.

This Opinion is addressed to ENTSO-E.

Done at Ljubljana, on 16 April 2025.

- SIGNED -

*For the Agency
The Director*

C. ZINGLERSEN

Annexes:

Annex I: First amendment of the ENTSO-E Monitoring Plan in accordance with Article 63(2) of Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a Guideline on Electricity Balancing