



Barriers for RES aggregation

Fabian Pause, SUER - Stiftung Umweltenergierecht
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SUER - Stiftung Umweltenergierecht

Foundation for Environmental Energy Law

- Non-profit think tank devoted to the research on environmental energy and climate protection law; founded in March 2011; based in Würzburg/Bavaria
- About 15 qualified lawyers with expertise in national, European and international law
- Providing advice to federal and state governments and agencies and to the European Commission
- **Our guiding question:**
How do we have to change the legal framework in order to achieve the energy and climate policy objectives?

WP2: BestRES project: March-September 2016

- D2.1: Existing business models
- D2.2: Benefits of aggregation
- D2.3: Barriers for aggregation



Subject of this presentation

D2.3: EU legal and regulatory framework

- EU regulation for aggregators not yet sufficiently differentiated
- In general, aggregators are incorporated in the market and accepted as market participants → However, no aggregator-specific regulation
- Legal provisions not up to date with variety of existing BMs (see e.g. EED: formal definition of ‘aggregator’ just seen from the load side and not also from the generation side)
- But more to come?! COM draft proposal on New Electricity Market Design expected 30/11/2016 (Preliminary results of public consultation):
 - “Need to support the development of aggregators by removing obstacles for their activity to allow full market participation of renewables”*

D2.3: Technical barriers (TU Vienna)

- *Missing smart grid infrastructure*
- *Lack of forecast quality*
- *Shorter life cycle of storage technologies*
- *Need of standardisation*
- *Lack of data provision/access*

D2.3: Legal and regulatory barriers

Main barriers

Lack of regulation

- *Lack of standard contracts as well as standards and processes*
- *Clear and specific objectives/more proactive approach of regulators*
- *Data and privacy protection*

Market rules

- *Wholesale and network tariffs*
- *Complex of bids*
- *Prequalification for market participation*



Thank you!

Fabian Pause

SUER- Stiftung Umweltenergierecht
pause@stiftung-umweltenergierecht.de