

# All TSOs IF amendments & T&Cs Common Harmonisation Proposal

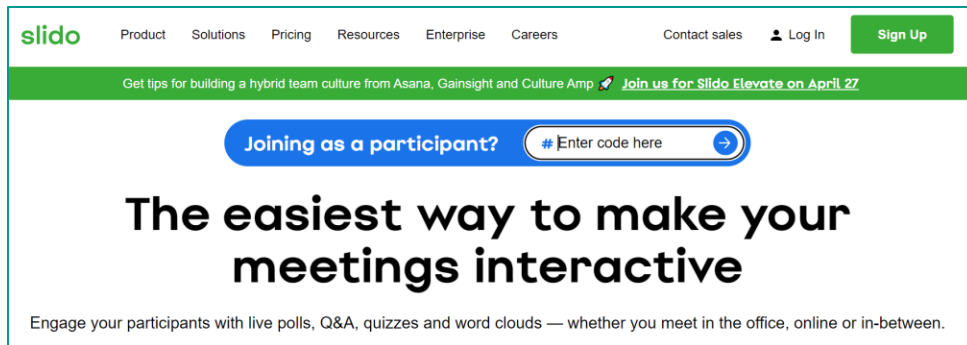
16 July 2025



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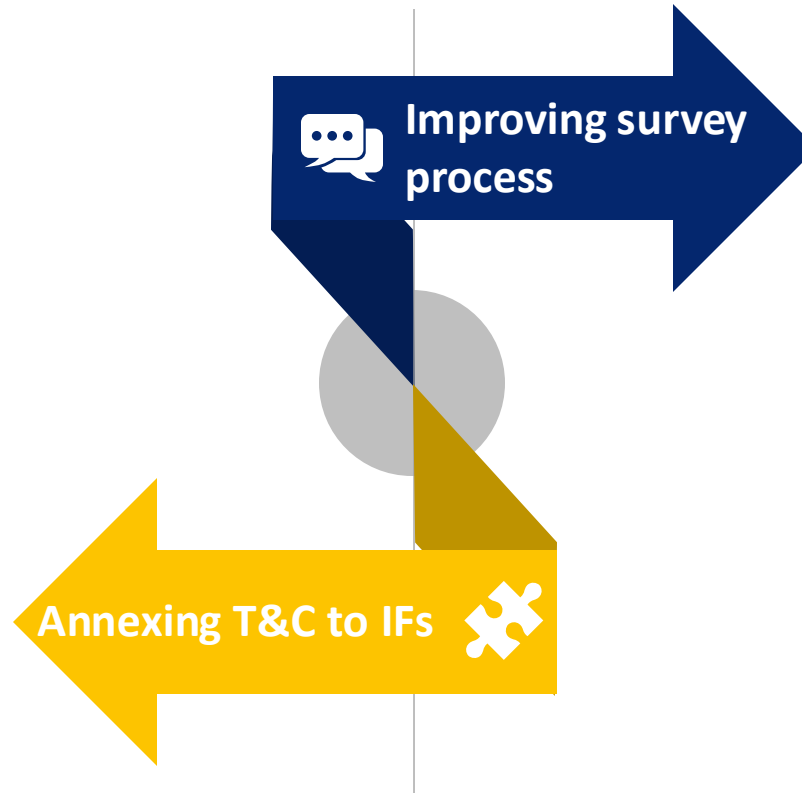


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# 1. Amendments to the mFRR and aFRR Implementation Frameworks

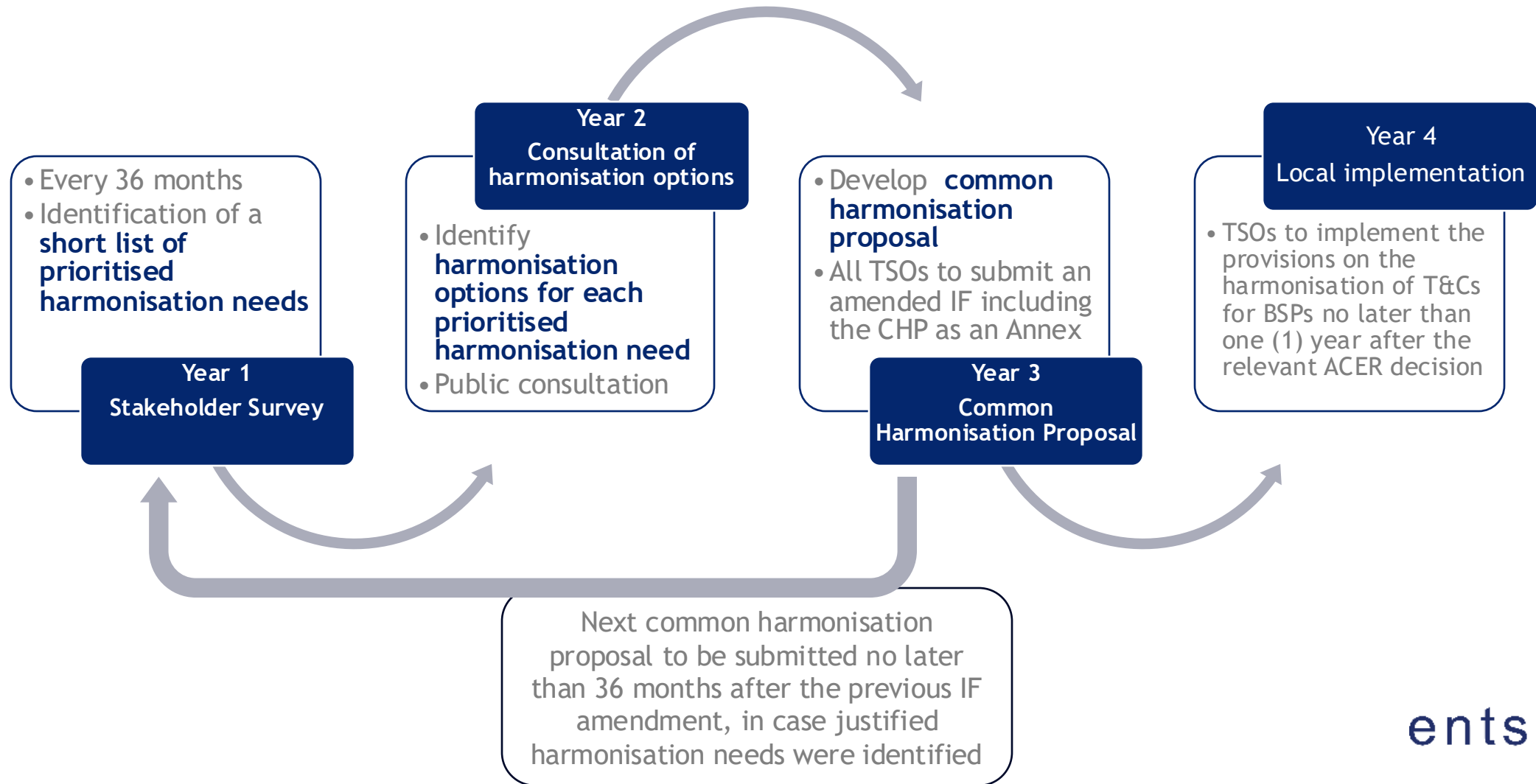
# Implementation Frameworks (IFs) amendment content

New article adding T&C  
harmonisation  
mFRR/aFRR IFs



Improving the yearly  
survey process: proposal to  
run a harmonisation needs  
survey every 3 years.

# Updated Process for harmonization of T&Cs for BSPs



## **2. Common Harmonisation Proposal key takeaways**

# 1. Recent developments

- All TSOs Common Harmonisation Proposal (CHP) **contains a framework for harmonisation of T&Cs related to FRR** to be further specified following the process as defined in the aFRRIF and mFRRIF. Besides general provisions, **it specifies six (6) areas for harmonisation:**
  - a. English Publication of T&Cs;
  - b. Permission of English communication between TSOs and Balancing Service Providers (BSPs);
  - c. Harmonisation of FRR Prequalification Process;
  - d. Switching of reserve providing units (RPU) and reserve providing groups (RPGs) between BSPs;
  - e. Re-Prequalification; and
  - f. Data exchange standards.
- The All TSOs CHP is included as an annex to both the aFRRIF and mFRRIF.



## 2. English publication of T&Cs and use of English in communication

All TSOs have developed the below proposals for the Common Harmonisation Proposal.

### English Publication of T&Cs

- The TSO shall publish the full or summarised version in English on Transparency Platform, the TSO website and, if relevant, joint-TSOs websites.
- Each TSO that publishes a summarised version of their national terms and conditions, the version should include at least:
  - Basic technical requirements,
  - Requirements on communication between BSP and the TSO;
  - The step-by-step process how to become a BSP.

### Use of English as a communication language

- Allow written and verbal communication between BSPs and TSOs in English, except any legally binding documents.
- Communication with TSO's control room operators shall be in a national language, if not specified otherwise.



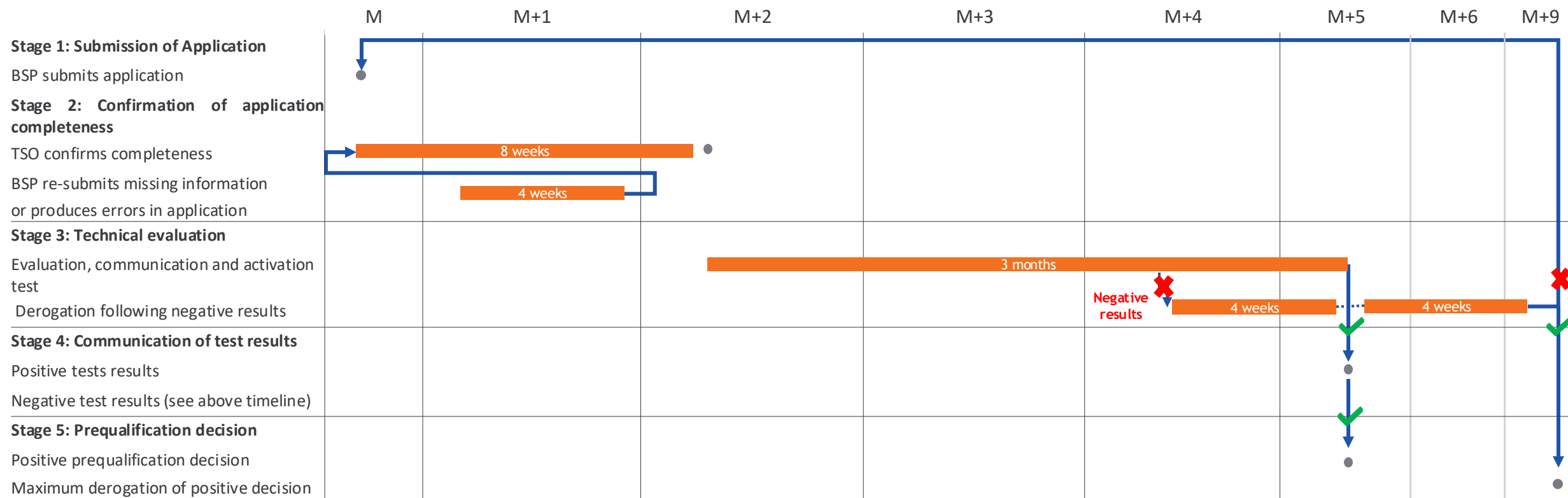
## 2. Harmonisation of FRR prequalification processes

- All TSOs propose two **new definitions: 'Ex-post verification' and 're-prequalification'**.
  1. **'Ex-post verification'** means the evaluation by the reserve connecting TSO of the ability of an RPU/RPG to provide the relevant service based on the monitoring activities according to the Article 158 (5) of the SO Regulation.
  2. **'Re-prequalification'** means the reassessment of qualification as defined in Article 159 (6) of the SO Regulation.
- The harmonised FRR prequalification process shall apply to standard products of the MARI and PICASSO platforms and be defined by the following steps:
  1. **Submission of an FRR prequalification application** (requirements defined in detail in Article 6)
  2. **8 Weeks:** The procuring TSO shall therefore confirm whether the application submitted is accepted.
    - **In case of errors or missing information**, the BSP shall be required to submit additional details to supplement the application within 4 weeks or the process is terminated.
  3. **3 Months:** TSO technical evaluation of the submitted application in comparison with the corresponding balancing product requirements of Article 158 of SO Regulation.
    - The BSP shall demonstrate by an activation test the ability of the RPU/RPG to provide the relevant service. The national T&Cs for BSPs may further specify in which cases an ex-post verification is applied instead of activation test.
    - The connecting or designated TSO shall notify their decision to the potential balancing BSP without undue delay.
    - **In case of negative outcome**, an extension may last no longer than 9 months from the submission of the FRR prequalification application.

## 2. FRR Harmonisation Process

### FRR prequalification timeline

Table 1: FRR prequalification timeline



● Milestone

## 2. Switching of RPU/RPGs between BSPs

- Simplified Process under the **following conditions**:
  - a) The communication infrastructure between BSP and RPU/RPGs of both the previous BSP and the new BSP shall be compatible;
  - b) The new BSP shall have a valid qualification status as defined by Article 16 of the EB Regulation;
  - c) The new BSP shall have demonstrated the ability to control a similar RPU or RPG for the provision of the same service. The criteria for similarity shall be subject to the reserve connecting TSOs' T&Cs for BSPs; and
  - d) The RPU or RPG affected by the switch has a prequalified capacity less than the threshold defined in the connecting TSO T&Cs.
- **In case of fulfilling all conditions**:
  - TSO may perform an ex-post verification of the BSP's newly added RPU or RPG.
  - **Timeline**: Process of switching shall be carried out within 6 weeks after TSO has all necessary informations, and fullfilment of all conditions.
- **In case of non-fulfilment of at least one condition above**:
  - TSO shall decide whether a prequalification process with activation test or ex-post verification is necessary.
  - **Timeline**: to be defined in the relevant national T&Cs starting from the moment the TSO has all necessary information.
- In case of a switch, the PQ status of the previous BSP shall also be checked, as it may be affected by the switch.
- The validity period of the prequalification status of the RPU/RPG that switched between BSPs shall be in accordance with national terms and conditions.

## 2. Re-Prequalification

### Notification Requirement

- BSP must notify the procuring TSO of changes to their RPU or RPG within 6 weeks, before the planned implementation date of any changes take place (established under Article 9).
- TSO must assess the need for re-prequalification or verification within 4 weeks upon receiving the notification.
- If re-prequalification or verification is required, TSO must notify the service provider, specifying the scope.

### Conditions for Re-Prequalification or verification (Article 9)

1. BSPs to notify TSO if at least one of the following conditions are met:
  - Capacity change of more than 10% or 3 MW (whichever is lower);
  - Significant ICT system changes impacting reliability or efficiency;
  - Information related to application submission is no longer valid;
  - Last prequalification took place over 5 years ago and no service within the past 12 months.
2. TSO may request re-prequalification of the respective RPU or RPG depending on certain conditions.

### Continuity of Services

- If re-prequalification is required, the service provider may continue services (changes in capacity/ICT system change/ application information no longer valid).
- If there is a capacity change or any details from the application submission are no longer valid, the service provider may continue with already prequalified capacity.

## 2. Termination

### Termination of prequalification status or (re-)prequalification process

- The TSOs may terminate the prequalification status of a RPU or RPG if one of the following conditions takes place:
  - a BSP did not deliver the corresponding service on RPU or RPG level in line with the service requirements in a 1-day period. If the BSP does not show improvement within 3 months, the prequalification of RPU or RPG may be terminated by reserve connecting TSO; or
  - Trigger of condition in Article 9(2), where a TSO can request re-prequalification if a BSP has failed to deliver the corresponding service in accordance with the service requirements set out in Article 158 SO Regulation.
- The TSO may terminate any prequalification or re-prequalification process if one of the following conditions takes place
  - Failure to complete the prequalification process.; or
  - the FRR qualification process takes longer than the TSO derogation to repeat the activation test according to Article 5 (5); or
  - Lack of delivery of the corresponding service in accordance with the service requirements set out in Article 158 SO Regulation.

## 2. Data exchange standards

- By 18 months from approval, ENTSO-E shall define and publish a list of European data exchange standards based on ETSI-CEN-CENELEC set of standards. Such standards shall focus on procurement, non-real-time activation, and settlement.
- By 24 months after the publication of the list above, each reserve connecting TSO shall implement the use of the European data exchange standards. Data exchange standards already implemented at the national level may continue to be applied.

### 3. Timeline

TSOs aim to progress on the Common Harmonisation Proposal according to the below timeline:

| Timeline                  | Milestones   |
|---------------------------|--|
| 2 July - 2 September 2025 | Public Consultation                                    |
| 16 July 2025              | Public Consultation Webinar                            |
| Late November 2025        | Submission of IFs + T&C Harmonisation Proposal to ACER |





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