

**SYMPOWER CONTRIBUTION**  
**Consultation 2026/101**

[Sympower](#) is Europe's leading flexibility service provider, balancing electricity grids through its local operations to create a truly sustainable energy system. It enables battery project developers and owners, commercial and industrial businesses, grid operators, and other energy stakeholders to participate in energy flexibility services.

We welcome the opportunity to share our contribution on aggregation of resources below 1 MW in the mFRR market.

We commend Statnett for taking a significant step toward enabling the participation of smaller resources in the mFRR market through aggregation. This initiative aligns with the broader European goal of fostering a more inclusive, flexible, and sustainable energy system. Nevertheless, the proposed changes are not enough to fully open the market and increase competition, as the opening of the market to independent BSP is not foreseen by the proposal.

**Positive Developments**

- **Aggregation for Smaller Resources:** The introduction of aggregation for resources below 1 MW is a progressive move. It recognizes the value of distributed energy resources and their potential to contribute to grid stability and efficiency. This change will encourage innovation and competition in the balancing market.
- **Clarity in Definitions:** The new definitions for "Resource" and "Flexibility Group" provide much-needed clarity, ensuring that all stakeholders understand the requirements and processes for participation. The establishment of a Flexibility Register is also a positive development, as it will streamline qualification, prequalification, and data exchange. Nevertheless, it is still to be seen how the register will be set up, and then implemented. It should not become an additional administrative burden for market participants.

**Areas for Further Improvement**

As previously mentioned, while the proposed changes are a step in the right direction, Sympower believes that additional measures are necessary to fully unlock the potential of independent BSPs and smaller market participants:

- **Barriers for Independent BSPs:** The current framework still presents significant challenges for independent BSPs seeking to participate on their own. The requirement that resources behind a single metering point can only be assigned to one BSP limits flexibility and may discourage new entrants. We recommend allowing

resources to be split or shared among multiple BSPs, provided that technical and operational feasibility is ensured.

- **Transparency and Accessibility:** The Flexibility Register should be designed with user-friendliness in mind, ensuring that all market participants—regardless of size—can easily register, update, and manage their resources. Clear guidelines and support mechanisms should be provided to facilitate this process.
- **Minimum Size Requirements:** The 1 MW minimum size for flexibility groups may still exclude many smaller but valuable resources. Consider revisiting this threshold or introducing a phased approach to gradually lower the minimum size, enabling even broader participation over time.
- **Maximum Size Requirements:** The 5 MW Maximum size limit should be reconsidered. It disproportionately favors incumbents with significant portfolios, while excluding innovative Balancing Service Providers and aggregators. This limits competition and stifles innovation in the balancing market. Moreover, many European TSOs (for instance SVK) allow for bigger or no maximum size limits for aggregated bids in their balancing markets. This shows that there is no technical limitation.
  - Proposed Alternatives
    1. **Remove the Maximum Size Cap:** Allow flexibility groups of any size above the 1 MW minimum, enabling market-driven optimization.
    2. **Regional Flexibility:** Adjust the cap based on bidding area characteristics, allowing smaller limits in regions with lower resource density.

Sympower strongly supports Statnett's efforts to modernize the mFRR market and create opportunities for smaller resources. However, to fully realize the benefits of aggregation and foster a competitive, innovative balancing market, we urge Statnett to consider the above recommendations. By addressing these areas, Statnett can further empower independent BSPs and accelerate the transition to a more flexible and sustainable energy system.

We appreciate the opportunity to contribute to this important consultation and look forward to continuing the dialogue on these critical issues.

Yours sincerely,

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