**Title: Google Response to the Consultation on the Proposal for a Modified Method for Balancing Service Providers (BSPs) and Balance Responsible Parties (BRPs) pursuant to EBGL Article 18**

**Date:** Jun 12, 2026
**Addressed to:** Statnett

### 1. Introduction and Strategic Context

WS Computing AS (Google) is proud to have invested in establishing data center infrastructure in Norway. Data centers represent an essential pillar of Norway's national digital infrastructure, a status that has been explicitly recognized by the Norwegian Parliament and codified under the Electronic Communications Act (Ecom Act), which entered into force on January 1, 2025. Ensuring operational robustness and continuous power availability for data centers in both normal and unexpected situations is crucial to maintaining the security and reliability of digital services for Norwegian businesses and the public.

Google strongly supports Statnett's efforts to implement the European balancing guidelines (EBGL) and transition toward full integration with the Manually Activated Reserves Initiative (MARI) platform. However, the proposed terms and conditions published on 30 April 2026 introduce certain critical operational and contractual rigidities that pose meaningful risks to both demand-side flexibility providers and the commercial viability of multi-party corporate renewable Power Purchase Agreements (PPAs) in Norway. This submission outlines our technical and policy feedback, focusing on two central issues: the rigid baseline methodology of the proposed Consumption Plan and the contractual blockages introduced by the "One BSP per Station Group" rule.

### 2. Proposed Consumption Plan Baseline (Article 64(4) / Section 2.5.1) Requires Operational Tolerances

Statnett proposes to introduce consumption plans as a reference for the delivery of reserves from consumption under Article 64(4), mirroring the production plans already delivered by generators. Under these proposed rules, the verification of mFRR delivery from consumption-side assets will be made directly against these hourly or 15-minute consumption plans, with the consumption plans effectively serving as a binding operational baseline.

While data center operations are typically characterized by a stable, continuous, and

predictable baseload consumption profile, unplanned shifts in load do occur. These occasional shifts are driven by customers starting/stopping workloads, critical operational requirements, including localized equipment and workload testing amongst other reasons. Under the proposed weekly tracking and compliance rules, these necessary operational fluctuations risk being flagged as non-compliant deviations, exposing demand customers to unwarranted compliance penalties and financial liability on top of potential imbalance costs already incurred. The additional layer of potential costs seems to add little in the way of incentives to contribute to grid stability.

Furthermore, using a rigid consumption plan as a binding baseline without operational tolerances creates a major deterrent for large consumers to offer behind the meter flexibility to the market. If an operator's standard operational shifts distort their baseline or are treated as non-compliant, it undermines the mathematical basis used to calculate true, additional flexibility. We note that in Sweden and Finland requirements for consumption planning are substantially looser (in the latter consumption plans are not required at all) than Statnett's current proposal, despite all three countries preparing to join the MARI platform. Deviating requirements as proposed here would likely hinder the integration of the mFRR markets across the Nordics.

**Our Specific Ask:**

To prevent these negative incentives, we request that Statnett introduce clear and explicit safety buffers and tolerances (such as a baseline adjustment mechanism or a reasonable margin of error, similar to the flexible baseline adjustments and tolerances used in other mature European markets) before any financial penalties or compliance reductions are applied. This is critical to ensure that data centers and other large consumer loads are encouraged to participate in voluntary balancing markets to relieve network loads, but not mandated to.

**3. The "One BSP per Station Group" Rule (Article 8(2)(c) / Section 2.1.3) Blocks Multi-Offtaker PPAs**

In Article 8(2)(c) and Section 2.1.3, Statnett proposes to clarify that a single station group can only be assigned to a single Balancing Service Provider (BSP), which must act as the sole BSP for all balancing markets in which the station group participates.

While this may simplify Statnett's administrative processes, it introduces severe commercial and legal blockages on the production side, particularly for large-scale renewable energy projects (wind and hydro) that are structured under multi-party Power Purchase Agreements (PPAs).

Large-scale renewable generation assets in the Nordics are frequently developed and financed based on long-term corporate PPAs involving multiple separate corporate offtakers, each contracting for a specific slice or percentage of the asset's capacity. Under the proposed "One BSP per Station Group" rule, coexisting BSPs are legally prohibited from operating on a single physical generation asset. This forces all offtakers to utilize a single, shared market interface for mFRR and active balancing. Such a restriction directly disrupts how balancing revenues, risk allocations, and split-incentives are commercially structured and managed between independent corporate offtakers.

**Our Specific Ask:**

To protect and encourage corporate PPA investments in Norway—which are essential to achieving Norway's 2030 renewable and climate targets—the regulatory framework must accommodate these multi-party contract structures. Google urges Statnett to introduce a rules-based exemption, a derogation, or a multi-BSP mechanism specifically designed for shared generation assets supporting multi-party corporate PPAs and other similar cases, ensuring that different corporate offtakers can maintain separate market interfaces for their respective shares of the physical asset.

#### 4. Conclusion

Google appreciates the opportunity to submit our feedback to Statnett's proposed EBGL Article 18 terms and conditions. While we strongly support the integration of the Nordic grid with the MARI platform, it is critical that the final terms avoid creating unnecessary barriers to digital and clean energy investments in Norway.

We urge Statnett to:

1. **Implement explicit, flexible safety buffers and baseline adjustment mechanisms** under the Consumption Plan to accommodate valid, punctual load shifts.
2. **Introduce a rules-based derogation** to the "One BSP per Station Group" rule

to support multi-offtaker PPA commercial structures on shared generation assets.

Google remains committed to being a constructive partner to Statnett and is available to engage in further bilateral dialogue to discuss these matters in detail.