

**RD-ES** is a working group composed of companies interested in operating as Independent Aggregators in Spain, once the regulatory framework allows it.

We advocate for the full transposition and effective implementation of EU regulations to ensure that Independent Aggregators can establish themselves as full-fledged participants in all Spanish electricity markets under fair and non-discriminatory competition conditions.

This will enable this new market player to unleash its full potential in the context of the Energy Transition, empowering consumers with tools to provide demand response and flexibility services. Our goal is to contribute to the creation of consumer-centric, flexible, fair, and competitive electricity markets, ensuring non-discriminatory access for all resource providers and customer types while facilitating demand aggregation. This aligns with Regulation (EU) 2019/943, Directive (EU) 2019/944, and the measures introduced in the Action Plan for Affordable Energy and the Clean Industrial Pact, presented by the European Commission in February 2025.

## **I. Core Principles of RD-ES**

- 1.** Enabling Independent Aggregators to operate in all electricity markets without requiring a prior agreement with the Balance Responsible Party (BRP)/supplier.
- 2.** Supporting a centralized imbalance correction model to ensure that flexibility services provided by Independent Aggregators do not negatively impact BRPs/suppliers.
- 3.** Promoting a centralized compensation model that removes barriers to demand-side flexibility participation, fosters business model development, and ensures economic viability. We advocate for mechanisms that mitigate the compensation impact on aggregators, such as recognition of system benefits, mutualization, or other alternatives.
- 4.** Monitoring regulatory and competitive barriers in the future Spanish Independent Aggregation framework and working with regulatory authorities to ensure compliance with EU legislation.
- 5.** Contributing to the development of new electricity markets (e.g., local flexibility markets, capacity markets, or flexibility auctions) where Independent Aggregators can operate as a recognized player in the energy sector.

## **II. Commitment and Collaboration**

The working group will meet monthly to discuss industry developments, assess public consultations on regulatory proposals, and raise awareness about demand flexibility and independent aggregation among consumers and energy operators.

RD-ES will also serve as a resource for institutions, authorities, and market players, offering expertise to support the development of a regulatory framework that fosters flexibility and competition in the Spanish electricity markets. As a first step, the group will communicate its formation to MITECO (Ministry for Ecological Transition), IDAE (Institute for Energy Diversification and Saving), and CNMC (National Commission on Markets and Competition).

Finally, RD-ES will promote its activities through social media, industry events, and relevant communication channels to expand its impact and encourage broader participation.