





Cross-Regional Roadmaps

Comments by SW TSOs







Cross-Regional Roadmaps: Long Term (I)

- □ Harmonization and integration of the allocation rules
 - #3: SWE TSOs prefer to separate the decision on the type of product to be implemented in NE, NE-Continent & Baltic, on one side, and IPE on the other side. The reasons are the different geographical scope and the clear need of a coordinated LT product in IPE.

Moreover:

- Unless derivative markets are mature enough, there is a necessity for transmission rights according to ACER FWGL on CACM (section 4.1)
- #6: The roadmap doesn't contain a detailed description for the SWE Region
- □ Harmonization and integration of the allocation platforms
 - #7: From the SWE region perspective, it exists the possibility to integrate IPE in CASC.EU in parallel or subsequently to IFE. Therefore, it is proposed to tackle IFE and IPE on one side, and NE, NE—Continent & Baltic on the other side.







Cross-Regional Roadmaps: Long Term (II)

- **□** #8: Harmonization of the nomination process:
 - The harmonization of the nomination process may be subject to the potential evolution towards FTRs;
 - This issue should be tackled together with the decision of a move towards FTRs in a multiregional scale.
- **□** Possible implementation of FTRs:
 - #9: A solid impact assessment will be done to analyse the impact of FTRs on the market model;
 - #10: Regarding the Implementation Plan, a pan-regional or even multi-regional approach would be preferable.







Cross-Regional Roadmaps: Day-Ahead (I)

- □ The whole process is very dependent on NWE region progress;
 □ NWE region should ensure sufficient exchange with non-NWE countries in the development process so that non-NWE member states may prepare in parallel.
 □ Information exchange with all NWE and non-NWE regions in the discussion on final EPC governance arrangement from the very beginning is essential.
 □ The discussion on the governance arrangement shall remain open for all EU stakeholders and regions from the very beginning in order to ensure preparedness of all member states.
 □ Clear process of cost negotiation with service providers needed:
 - Non-NWE stakeholders are not participating and cannot influence the future actual costs of the NWE solution;
 - ACER and NRAs shall ensure that arrangements for the allocation of costs for the EPC are established on the European level







Cross-Regional Roadmaps: Day-Ahead (II)

- **□** #4: Validation of PCR algorithm:
 - The PCR algorithm is already assumed validated in the roadmaps, however it has not been selected yet as a EPC solution;
 - In the proposed roadmap, ENTSO-E only preliminary analyses whether PCR can meet TSO requirements concerning capacity allocation and technically asses the PCR;
 - No clear link to the subsequent validation by NRAs
- Missing indication on Competition Law Compliance revision process
- ☐ #12: Updates on the SWE roadmap are needed since SWE is already working on the implementation, by mid 2012, of operational aspects
- #12: To be in disposition of joining the EPC also by end 2012, SWE region should analyse to what extent governance arrangements are needed







Cross-Regional Roadmaps: Intraday

- ENTSO-E and Europex agreed to develop an interim solution for the ID target model by the end of 2012, at least in NWE-region, and by the end of 2014 in Europe fully compliant with FWGL CACM and NC.
- #3: According to what is provided in this cross-regional roadmap and the FWGL CACM, IPE transmission capacity should be allocated through the ID continuous platform since it is a cross-zonal interconnection.
- #13: The whole ID roadmap in the region is conditional to this first milestone. Once the agreement is reached, the subsequent steps will follow
 - The compatibility of implicit auctions and continuous trading at regional level is still under study and assessment. No agreement has been still reached in the SWE Region.







Cross-Regional Roadmaps: Capacity calculation

□ SWE TSOs are planning to harmonize the ATC calculation methodologies in the region by the foreseen preparation of a unique procedure for IFE & IPE borders