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European Union Agency for the Cooperation of Energy Regulators

Policy paper on further development of the EU electricity forward market

Public workshop – 6 July 2022 Martin Povh Thomas Kawam



Opening 9:00 – 9:10

Christophe Gence-Creux, Head of Electricity Department, ACER

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Forward electricity markets ...

- Carbon neutrality and structural shocks increased the uncertainty of the future electricity prices
- Growing importance of forward electricity markets crucial to provide some stability to stakeholders

... Assessed in an ACER policy paper

- The objectives of this draft policy paper are to:
 - identify the main problems experienced in the EU's electricity forward market
 - identify possible solutions that policy makers could introduce to address these problems
- If the evaluation and analysis following the consultation confirm the assumed improvements, <u>ACER</u> <u>may recommend amendments of the applicable legal framework in a way to accommodate one</u> <u>or several policy options</u>.



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Slido



Indicative time	Agenda Speakers			
8:50-9:00	Dial-in time			
9:00-9:10	Opening Christophe Gence-Creux, ACER			
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	Session 1:		
9:10-9:50	 Objectives and problems statement Policy options: No regrets and regulatory intervention 	Martin Povh, ACER Thomas Kawam, ACER	
9:50-10:00	Q&A Session 1		

10:00-10:25	Session 2: Policy options: TSO intervention (1/2) Thomas Kawam, ACER			
10:25-10:40	Coffee Break			
10:40-11:10	 Policy options: TSO intervention (2/2) 	Martin Povh, ACER		
11:10-11:20	Q&A Session 2			

11:20-11:45	 Session 3: Policy options: TSOs' transmission products Evaluation and recommendations 	Thomas Kawam, ACER Martin Povh, ACER
11:45-11:55	Q&A Se	ssion 3

11:55-12:00	Closing session	Mathieu Fransen, ACER
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Further development of the EU electricity forward market



 Scoping of the amendment to FCA Regulation Recommendation on amendment to FCA Regulation (subject to the EC's



Objectives and problems description 9:10 – 9:35

Martin Povh – Senior Expert, Electricity Department, ACER

Ask question via Slido in MS Teams, by scanning the QR code or using the direct link:





- 1. Facilitate sufficient forward hedging opportunities
- 2. Each market participant should be able to hedge its exposure:
 - (a) effectively (objective 1), in the sense that the available hedging products:
 - i. can provide effective hedge against the risk;
 - ii.for each bidding zone (regardless of its size); and
 - iii.in all timeframes ahead of delivery; and
 - (b) efficiently (objective 2), in the sense that hedging products are available:
 - i. at competitive prices (low bid-ask spread, low risk premium); and
 - ii. in a way that is efficient for market participants to contract them.



- 1. PTR Physical Transmission Right: the right to physically transfer electricity from one zone to another zone or to a common hub.
- 2. FTR Financial Transmission Right: the right to receive the day-ahead market spread between one zone and another zone or a common hub.
 - FTRs are issued by allocation of cross-zonal capacity and TSOs act as a counterparty
 - FTRs can be options (holder receives only positive market spread from TSOs) or obligations (holder receives positive market spread and pays negative market spread to TSOs)



- 3. CfD Contract for Difference: the right (the obligation) to receive (to pay) the day-ahead market spread between one zone and another zone or a common hub.
 - CfDs are not issued by TSOs, the counterparty is another market participant or power exchange
 - CfDs are obligations (holder receives positive market spread and pays negative market spread)
- 4. EPAD Electricity Price Area Differential: takes the same meaning as a CfD
- 5. EPAD Combo or CfD/FTR Combo: means a combination of two CfDs from two different bidding zones linked to a common hub price.
 - Such combos would be issued by TSOs with allocation of cross-zonal capacity



Identified problems





Figure 34: Churn factors in major European forward markets – 2016–2020

² 0 DE GB FR NL RO PL BE HU Nordic IT SI CZ BG Iberia 2016 2017 2018 2019 2020

Source: ACER MMR, Electricity wholesale volume 2020



Problem 2: LTTRs are competing with zonal energy forwards/futures – split/shift of liquidity

- LTTRs provide alternative way to satisfy demand for hedging
- LTTRs increase liquidity in liquid markets and decrease in less liquid market

Problem 3: There is no secondary market for LTTRs

- LTTRs cannot be acquired on a continuous basis
- LTTRs are not able to satisfy demand for hedging when the exposure arises

Problem 4: Forward market is a significant barrier for bidding zone reconfiguration

- Any discussion on bidding zone reconfiguration always stumbles upon forward market liquidity
- Good market design should not destroy liquidity when biding zones are changed







Problem 5: LTTRs are issued only for one year ahead

- Existing LTTRs are able to support forward market only up to 1 year ahead
- There is significant hedging need at least up to 3 years ahead

Problem 6: PTRs/FTRs options offer only one sided hedge

- Options are not well compatible with the main products in forward market, i.e. Futures
- Options don't support secondary market,
- Options are not well suited for bridging/arbitraging between two forward markets (i.e. buy Futures_A + FTR_AB = sell Futures_B)







Problem 7: LTTRs are continuously undersold

- If LTTRs are predominantly used for hedging, risk premia should be zero or positive
- LTTR auction prices generally below expected market spread negative ex-post risk premia
- Existence of caps do not explain significant negative risk premia

Problem 8: Non-coordinated exemptions for TSOs to offer LTTRs

- Legal framework allows NRAs to exempt TSOs from offering LTTRs
- Application of this legal framework is not transparent and non-harmonised







Policy options – No regrets 9:35 – 9:40

Thomas Kawam – Seconded National Expert, Electricity Department, ACER

Ask question via Slido in MS Teams, by scanning the QR code or using the direct link:

https://app.sli.do/event/aUd9LqaV9eAktx1q4yVX6P





1. Equalize CNTC and FB requirements in all timeframes

- Flow-based should become a default in all timeframes.
- CNTC can be used in cases where there is no interdependence between borders •



Day-Ahead timeframe



2. Introduce monthly products at 1YA auction

- Yearly PTR/FTR auction currently allocated only yearly baseload
- To add 12 monthly baseload products at yearly auction

	Current auction planning	Proposed auction planning	
Yearly products	One auction in November of Y-1	One auction in November of Y-1	
Monthly products	One auction in M-1	One auction in November of Y-1 and in M-1	



Policy options – Category 1: Regulatory intervention 9:40 – 9:50

Thomas Kawam – Seconded National Expert, Electricity Department, ACER

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Legal background to determine regulatory intervention:

Regulation 943/2019, Article 9(1)* : In accordance with Regulation (EU) 2016/1719, <u>transmission system</u> <u>operators shall issue long-term transmission rights or have equivalent measures in place</u> to allow for market participants, including owners of power-generating facilities using renewable energy sources, to hedge price risks across bidding zone borders, <u>unless an assessment</u> of the forward market on the bidding zone borders performed by the competent regulatory authorities <u>shows that there are sufficient hedging opportunities in the concerned</u> <u>bidding zones</u>.

Option 1.0: Status quo: Regionally different approaches

- Not solving Problem 8: Non-coordinated assessment and decisions of NRAs
- Legally feasible, but not preferred



*Underlined section were added by ACER in the context of this presentation



Option 1.1: Coordinated assessment and decisions on hedging opportunities

- NRAs in regions jointly assess and decide on possible exemptions for TSOs to issue LTTRs
- ACER to provide an EU wide recommendation on the assessment and decisions on exemptions
- Largely solving Problem 8: Non-coordinated assessment and decisions of NRAs
- Legally feasible and preferred policy option

Option 1.2: Mandatory TSOs' involvement: Not compliant with Article 9(1) of Regulation 943/2019

Option 1.3: No regulatory intervention: Not compliant with Article 9(1) of Regulation 943/2019





Q&A for Session 1 9:50 – 10:00



Moderator: Mathieu Fransen, Team Leader, Electricity Department, ACER

Ask question via Slido in MS Teams, by scanning the QR code or using the direct link:





Policy options – Category 2: TSO's intervention (1/2) 10:00 – 10:25

Thomas Kawam – Seconded National Expert, Electricity Department, ACER

Ask question via Slido in MS Teams, by scanning the QR code or using the direct link:





Policy options, Category 2: TSOs' support Option 2.0: Bidding zone border LTTRs





Policy options, Category 2: TSOs' support Option 2.0: Bidding zone border LTTRs





Policy options, Category 2: TSOs' support Option 2.1: Improved allocation and product timeframes

Option 2.1: Improved allocation and product timeframes

- Introduce 3YA, 2YA, 1YA allocation timeframes and products
- Introduce more frequent auctions: e.g. M auctions with Y products, W auctions with M products
- Introduce continuous/secondary market

Y	′-3 Y	-2 Y	-1 Delivery year
One auction	Twelve auction	Twelve auctions	Fifty-two auctions
Yearly product	Yearly product	Yearly + monthly products	Monthly + weekly products
TSO only sells product	TSO sells and MPs resell product	TSO sells and MPs resell product	TSO sells and MPs resell product





Policy options, Category 2: TSOs' support Option 2.2: Zone-to-zone LTTRs





While the Z2Z feature is supported, this option in overall is not preferred



Policy options, Category 2: TSOs' support Option 2.2: Zone-to-zone LTTRs





Policy options, Category 2: TSOs' support Option 2.3: Zone-to-hub LTTRs

Option 2.3: Zone-to-hub LTTRs

- All LTTRs are issued from a common hub to a zone
- Bidding can be Z2Z or Z2H, in case of Z2Z the holder gets LTTR combo
- Hub price defined as aggregation of several bidding zones (e.g. weighted average)







Policy options, Category 2: TSOs' support Option 2.3: Zone-to-hub LTTRs





Coffee Break 10:25-10:40





Policy options – Category 2: TSO's intervention (2/2) 10:40 – 11:10

Martin Povh – Senior Expert, Electricity Department, ACER

Ask question via Slido in MS Teams, by scanning the QR code or using the direct link:





Policy options, Category 2: TSOs' support Option 2.4: Coupling with CfDs

Option 2.4: Forward market coupling with CfDs

- Products are standardised CfDs offered by PXs/NEMOs in each biding zone: Y, Q, M
- TSOs provide long term cross-zonal capacities
- Market coupling operator organise market coupling by simultaneously matching CfDs and cross-zonal capacities at auctions + continuous trading
- Implicit allocation of long term cross-zonal capacities
- Relies on liquid forward market at the hub





Policy options, Category 2: TSOs' support Option 2.4: CfDs without coupling





Policy options, Category 2: TSOs' support Option 2.4: Coupling with CfDs





Policy options, Category 2: TSOs' support Option 2.5: Coupling with Futures

Option 2.5: Forward market coupling with Futures

Products are standardised Futures offered by PXs/NEMOs in each biding zone: Y, Q, M

- TSOs provide long-term cross-zonal capacities
- Market coupling operator organise market coupling by simultaneously matching Futures and crosszonal capacities at auctions + continuous trading
- Implicit allocation of long term cross-zonal capacities
- Does not require on any new products or hubs





Policy options, Category 2: TSOs' support Option 2.5: Coupling with Futures





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Policy options, Category 2: TSOs' support **Option 2.6: Market making**

Bid-ask spread

Example Option 2.6: Market making Without market With market **Problem solving** maker maker TSOs organise a tender for market Buy Sell Sell Buy making function 60 60 58 58 Selected market makers are obliged to 57 57 55 facilitate order books for forward 55 products at PXs (Futures, CfDs) with an **Bid-Ask** Bid-Ask objective of reducing the bid-ask spread Spread Spread = 10= 2 Jânnâ They will charge a fee for this service [⊃]rice [€/MWh [⊃]rice [€/MWh 45 45 which is covered from network tariffs 43 43 42 42 5 The financial risk for TSOs is partially 40 40 limited by the tendering outcome MP's bid at X Market maker's bid [€/MWh] for a at X [€/MWh] for a volume of 1 MW volume of 1 MW.



Policy options, Category 2: TSOs' support Preliminary analysis

Summary of the options on the type of TSO intervention Preferred policy options							
	Option 0	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6
	BZB LTTR	Products and timeframe	Z2Z LTTR	Z2H LTTR	CfD Coupling	Futures Coupling	Market Making
Problem 1 🗮		0	+	++	++	++	+
Problem 2	0	0	0	++	++	++	++
Problem 3	0	+	-	+	++	++	++
Problem 4		0	0	++	++	+	0
Problem 5		+ +	1	1	1	1	++
Problem 7	0	0	+	+	++	++	++

Problems 6 and 8 are not included in the table as they are addressed respectively by the type of products offered by the TSO and the need for intervention.



Q&A for Session 2 11:10 – 11:20



Moderator: Mathieu Fransen, Team Leader, Electricity Department, ACER

Ask question via Slido in MS Teams, by scanning the QR code or using the direct link:





Policy options – Category 3: Type of TSOs' transmission products

Thomas Kawam – Seconded National Expert, Electricity Department, ACER

Ask question via Slido in MS Teams, by scanning the QR code or using the direct link:





Policy options, Category 3: Products Option 3.0: PTRs and FTR options

Option 3.0: Status quo (PTRs and FTRs options)

- PTRs with Use-It-Or-Sell-It, FTR Options
- Firmness regime same as today: full firmness with possible caps
- Options provide more flexibility to some market participants
- Options are not well compatible with the main products in forward market, i.e. Futures
- Options don't support secondary market
- Options are not well suited for bridging/arbitraging between two forward markets (i.e. buy $Futures_A + FTR_{A \Rightarrow B} = \text{sell } Futures_B$)

Problem solving



Policy options, Category 3: Products Option 3.1: PTRs/FTRs with reduced firmness

Option 3.1: PTRs and FTR options with reduced firmness

- TSOs want to reduce compensation in case of decoupling
- In such cases the remuneration would be based on the price of fallback/shadow auction
- This would significantly reduce LTTRs' firmness
- If NRAs conclude that hedging opportunities in the market are inadequate...
- .. it would be counterproductive to offer hedging tools that are not providing proper hedge





Policy options, Category 3: Products Option 3.2: FTR obligations

Option 3.2: FTR obligations

- Two sided hedge and remuneration
- Only one product per border single direction
- More compatible with Futures
- Supporting secondary market
- In case of Z2H model, FTR obligations are the only way to go





Evaluation and Recommendations

11:30 - 11:45

Martin Povh – Senior Expert, Electricity Department, ACER

Ask question via Slido in MS Teams, by scanning the QR code or using the direct link:





Preliminary summary analysis

- Existing forward markets do not function as a single integrated electricity forward market
- (Excess) supply in one zone is not meeting (excess) demand in another zone...
 - ...because of cross-zonal price risk
- We want to bridge national forward markets into one single integrated EU market
 - ...to match (excess) supply and demand for hedging
- Existing long term capacity allocation is not successfully integrating the forward markets...
 - ...like we see in the SDAC or SIDC
- Electricity forward markets can only be improved if we pool the demand and supply from areas larger than one single bidding zone



Preliminary recommendations

- 1. Harmonise the assessments and decisions of regulators when exempting TSOs from supporting forward markets (with capacity allocation)
 - Coordinated regional decisions, soft EU-wide harmonisation
- 2. Improve the allocation of long-term cross-zonal capacities in a way that integrates national forward markets into a more integrated EU forward market:
 - *i.* Longer allocation horizons, more frequent auctioning, strengthening of continuous/secondary market
 - *ii.* Three promising design options: zone-to-hub FTRs, market coupling with CfDs and market coupling with Futures
- 3. If TSOs continue to allocate LTTRs, these should be allocated in a form of **FTR obligations**



Q&A for Session 3 11:45 – 11:55



Moderator: Mathieu Fransen, Team Leader, Electricity Department, ACER

Ask question via Slido in MS Teams, by scanning the QR code or using the direct link:





For the policy paper draft for consultation: we would very much welcome your comments and concrete proposals of improvements.

All the responses will be published after the end of the public consultation, and the ACER reply to the responses will follow.



- 1. Do you agree with the identified problems of existing electricity forward markets in EU?
- 2. Do you agree that the proposed policy options are able to address the identified problems of existing electricity forward markets in EU?
- 3. What is the main element that the policy paper fails to address? (open text two words maximum)





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