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EFET response to Nordic TSOs' proposal for ramping restrictions (amended)

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The European Federation of Energy Traders (EFET) would like to thank ENTSO-E for the opportunity to comment on the amended Nordic TSOs' proposal for ramping restrictions.

We understand that the proposed change concerns the addition of NordLink and no other material amendments to the original proposal have been made. We have no objections to this amendment. However, we would like to make some additional comments and proposals.

EFET in general questions the application of system ramping restrictions, especially the introduction of maximum changes to the trading plans from one hour to the next. We find that there is insufficient justification for these restrictions. As long as the aggregate of market participants act according to their trading plans, and they will, there is no need for measures to alleviate concerns that large changes in the trading plans (e.g. change from full export to full import (or vice versa) in all DC interconnectors) would have a serious negative impact on the frequency of the Nordic system.

As long as system ramping restrictions are deemed necessary, EFET proposes to apply a sum limitation to all DC interconnectors connected to the synchronous Nordic system, instead of limitations on each DC interconnector individually. Such a sum limitation would allow trade across one DC interconnector to remain unrestricted if trade across another DC interconnector would anyhow not result in changing trade schedules. This solution would allow the Nordic TSOs to limit large variations in the Nordic power balance with fewer limitations to cross-zonal trade. Therefore, the forthcoming amendment must be used to replace individual limitations by sum limitations, as far as possible.

Furthermore, priority should be given to the prompt introduction of an imbalance settlement period (ISP) of 15 minutes. This should relieve the balancing/ ramping challenges and thus, result in less restrictive ramping restrictions on DC interconnectors.

Finally, NSL - the new DC interconnector between the UK and Norway - is not mentioned and should also be covered as it is supposed to come online early next year.