

EFET response to ENTSO-E consultations on harmonisation of shadow allocation rules

Channel CCR: 44 CACM – Amendment of the Channel CCR Fallback Procedures (incl. shadow allocation rules)

SWE CCR: 44 CACM – First amendment of the SWE CCR Fallback Procedures (incl. shadow allocation rules)

Fallback procedure for Greece-Italy Capacity Calculation Region

Italy North CCR: 44 CACM – First amendment of the Italy North CCR Fallback Procedures (incl. shadow allocation rules)

Core CCR: 44 CACM – First amendment of the Core CCR Fallback Procedures (incl. shadow allocation rules)

EU Shadow Allocation Rules – Amendment – CCR Hansa and NO-borders Public Consultation

Fallback procedure for SEE Capacity Calculation Region

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The European Federation of Energy Traders (EFET)¹ would like to thank the transmission system operators (TSOs) for their proposal aiming to align the shadow auction rules across capacity calculation regions (CCRs). We support this harmonisation in order to facilitate the readability of procedures by market participants in case of (partial) decoupling and incentivise their participation to the shadow auctions. As a result, we generally support the proposed changes.

For the Core region, we request further details as to the proposed change to article 17.1. Indeed, this article foresees that, contrary to other borders, shadow auctions will be performed at the Italian-Slovenian border only in case of a decoupling known in advance, and not in case of unforeseeable incident. As no explanatory document was provided to justify this choice, we are not in a position to support this change.

Looking more broadly at the subject, we believe that a more general discussion should be started on shadow auctions. The repetition of decoupling events since June 2019 – and limited participation of market participants to the shadow auctions – showed the necessity to organise

¹ The European Federation of Energy Traders (EFET) promotes and facilitates European energy trading in open transparent, sustainable and liquid wholesale markets, unhindered by national borders or other undue obstacles. We currently represent more than 100 energy trading companies, active in over 28 European countries. For more information, visit our website at www.efet.org

regular testing and trainings to ensure the market is fully prepared. Despite discussions between TSOs, nominated electricity market operators (NEMOs) and market participants, no such testing has yet been organised. In addition, we invite TSOs to propose further reforms for the industrialisation and standardisation of bidding processes across shadow auction platforms. Since this concerns all bidding zones, a debate at the Market European Stakeholders Committee (MESCC) before the end of 2020 would be necessary.