

Electricity Balancing Stakeholder Group (EB SG) Meeting

Date: 26 October 2023
Time: 10:00-15:00
Place: Physical meeting (Brussels) & telco

Participants

No.	Surname	Name	Company	Present (Y/N)
1.	Tellidou	Athina	ACER	Y
2.	Fransen	Mathieu	ACER	Y
3.	Pavesi	Marco	ACER	Y
4.	Viehhauser	Martin	ACER	Y
5.	Brantl	Christina	ACER	Y
6.	Rossi	Stefano	ARERA	Y
7.	Behrens	Simon	BNetzA	Y
8.	Zwinka	Barbara	BNetzA	Y
9.	Ishii	Eveliina	Energiavirasto	Y
10.	De Chambure	Cyprien	SIA-Partners	Y
11.	Veslin	Florian	SIA-Partners	Y
12.	Maenhoudt	Marijn	CREG	Y
13.	Bertrand	Gilles	CREG	Y
14.	Petsinis	Konstantinos	ADMIE	Y
15.	Horn	Evelyn	CREOS	Y
16.	Vanska	Vesa	Fingrid	Y
17.	Šarūnas	Burdulis	Litgrid	Y
18.	Peregrina Mayoral	Ester	Red Electrica	Y
19.	Pascua Baron	Miriam	Red Electrica	Y
20.	De-Veyrac	Antoine	RTE	Y
21.	Sawicki	Grzegorz	PSE	Y
22.	Łyżwa	Wojciech	PSE	Y
23.	Lavriková	Natália	SE	Y
24.	Cerman	Anton	SEPS	Y
25.	Onofrej	Jakub	SEPS	Y
26.	Anandha	Jayaram	Accenture	Y
27.	Janson	Stefan	ENBW/EFET	Y
28.	Hernández Galvis	Dione	RWE	Y
29.	Biglia	Lorenzo	EFET	Y
30.	Korčák	Štefan	EFET	Y

31.	Romanchenko	Daniel	Europex	Y
32.	Stretti	Michele	Europex	Y
33.	Robaye	Helene	Eurelectric	Y
34.	Bonneville	Claire	Eurelectric	Y
35.	Van den Kerckhove	Olivier	Eurelectric	Y
36.	Peerhossaini	Donia	Eurelectric	Y
37.	Holm	Inger Kristin	CERRE	Y
38.	Beckstedde	Ellen	Vlerick Business School	Y
39.	Schlipf	Dominik	ENTSO-E	Y
40.	Vakhtangishvili	Nino	ENTSO-E	Y
41.	Costa	Daniel	ENTSO-E	Y
42.	Brandauer	John	ENTSO-E	Y
43.	Bjellerup	Victoria	ENTSO-E	Y
44.	Gasimov	Nijat	ENTSO-E	Y
45.	Marcenac	Ludivine	ENTSO-E	Y
46.	Oliveira	David	ENTSO-E	Y
47.	Tanwar	Megha	ENTSO-E	Y
48.	Brun	Vanessa	ENTSO-E	Y
49.	Csete	Márk	ENTSO-E	Y
50.	Steber	David	ENTSO-E	Y
51.	Pierreux	Nicolas	ENTSO-E	Y
52.	De Haan	Jerom	ENTSO-E	Y
53.	Vrolijk	Ruud	ENTSO-E	Y
54.	De La Fuente	Jose Ignacio	ENTSO-E	Y
55.	Grosso	Leonardo	ENTSO-E	Y
56.	Przychodzien	Krzysztof	ENTSO-E	Y
57.	Pentasuglia	Enzo	ENTSO-E	Y
58.	Farrokhsesht	Mana	ENTSO-E	Y
59.	Schindler	Jonathan	ENTSO-E	Y
60.	Pflanzer	Vaclav	ENTSO-E	Y

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Minutes

1. Welcome and introduction

ACER representative and ENTSO-E representative welcome participants and introduce the agenda. ENTSO-E representative reminds all attendees online that any recording of the session (by an artificial intelligence minutes recorder or otherwise) is not allowed; the official meeting minutes will be posted on the ENTSO-E website following the meeting.

2. Balancing platform updates

ENTSO-E representative presents an update about the status of all European Balancing Platforms. Highlighted progress includes the inclusion of new TSOs to the platforms (go-live of ESO in IGCC, TERNA in PICASSO and APG in MARI), design improvements, changes to local procurement rules and significant economic surplus for the IGCC platform of around €280 million in the first half 2023, as well as an economic surplus for the first time of €7.1 million for MARI, €100 million in Q1-Q3 2023 for PICASSO, and €200 million from January to September for TERRE. He notifies that the accession roadmaps for 2024 are now developed and will be published in late October.

EBSG discusses:

- EFET representative asks about the situation of the Nordics, and if the ENTSO-E representative could expand on this.
 - ENTSO-E representative clarifies that Energinet and Fingrid plan to connect to the platforms before the legal deadline and that Statnett and SVK published a statement on this topic.
- EURELECTRIC representative asks if stakeholders could have some updates during the next EBSG on the Capacity Management IT Solution implementation.
 - ENTSO-E representative states that the Capacity Management IT Solution had its technical [go-live](#) on 4 October 2023.

➤ **ENTSO-E to provide an operational update on the Capacity Management IT Solution in the April 2024 EBSG meeting.**

a. IGCC

ENTSO-E representative informs that, since the go-live of ESO (Bulgaria) in March 2023, all EU TSOs are connected to the platform. He points out that there could be a new accession roadmap coming soon to bring more members to the platform. He adds that there was an all-time high in terms of the total netted volume (in July 2023) and that the platform is using 79% of the total netting potential available.

EBSG discusses:

- EFET representative asks if there are any plans from the TSOs for an “IGCC exit strategy” that

is similar to the accession roadmap.

- ENTSO-E representative replies that there is no such roadmap and that as long as there is a TSO on the IN-platform and not on PICASSO, TSOs will still need the optimisation function and ENTSO-E will keep it running until then.

b. MARI

The ENTSO-E representative updates on MARI developments. He states that APG joined the platform in June 2023 and that, since APG go-live, only one price incident has happened. He adds that there was an economic surplus of €7.1 million from January to September 2023.

EBSG discusses:

- ACER representative asks for clarification about the term “unsatisfied elastic demand” on slide 11.
 - ENTSO-E representative states that unsatisfied demand was the demand that was submitted but not met.
 - ENTSO-E representative clarifies that ENTSO-E should elaborate this explanation during the PICASSO part of the slides, and that the wording should be *additional* unsatisfied demand.
 - ACER representative asks to clarify what is the economic surplus.
 - ENTSO-E representative notes that ENTSO-E should clarify this slide at a later stage.

➤ **ENTSO-E to clarify the MARI unsatisfied demand calculations and theoretical assumptions behind.**

c. PICASSO

ENTSO-E representative presents the updates on the recent developments in the PICASSO platform and notes that TERNA accessed the platform in July 2023, and that remaining Member TSOs will gradually join the platform. He provides an insight into the structure of the PICASSO CMOL and mentions that the Merit Order List (MOL) is stable and between 400-500 euros per MWh.

EBSG discusses:

- EFET representative asks whether the ENTSO-E representative can clarify when TERNA will publish their aFRR demand report.
 - ENTSO-E representative is not able to answer this question and notes that this question would need to be submitted to TERNA representatives.
- EFET representative states that satisfied demand numbers of TERNA are significant, while economic surplus numbers are small. Referring to slide 16, he asks if that means that Italy exceeds the 500MW that is offered in the platform.
 - ENTSO-E representative clarifies that the low economic surplus could mean that bids in this area are cheap, and that if you have bids that are not competitive, the economic surplus is not very high. In terms of the number of additional demand, he agrees with the EFET representative that the amount is negligible compared to the total demand present in the platform.
 - EFET representative asks how the aFRR prices of Italy are calculated.

- ENTSO-E representative states that he would need to ask TERNA and that he could not answer the question, but clarifies that prices are set by BSPs which then submit them to TERNA.
- ACER representative asks the ENTSO-E representative to further clarify the graphical representation on slide 20.
 - ENTSO-E representative notes that ENTSO-E did a virtual activation of the CMOL at 1500 MW, and states that the MOL in a positive direction at 1500 MW is stable and in the range of 400-500 euros/MWh, with few outliers, while for negative direction, there is also a kind of seasonal behaviour of the MOL bids, with prices in July and August a bit higher compared to the period of late-August and September, as well as more dependency on the weekends.
- EURELECTRIC representative asks if it is possible to have an idea of the number of BSPs active on the PICASSO CMOL.
 - ENTSO-E representative states that this information is not available in the platform as ENTSO-E gets the bids in an anonymized manner. He notes that ENTSO-E might have a database for further evaluation, and that he would need to clarify this with colleagues.

➤ **ENTSO-E to clarify when the aFRR activation of TERNA is published.**

d. TERRE

ENTSO-E representative explains the latest developments in TERRE and indicates that TERRE TSOs met NRAs during an Interest Group (IG) meeting in October to share the main results of the public survey and possible way forward with the number of clearings. He adds that updates will be communicated during the next Balancing Platform Stakeholder Workshop on 30 November.

EBSG discusses:

- On slide 23, ACER representative asks if the difference between the demand volumes and the bid activation volume is mainly unsatisfied elastic demand, or if there are cases of unsatisfied inelastic demand (especially focusing on the representation of positive RR in September in the demand volumes chart, as it is not following the trend).
 - ENTSO-E representative responds that there could be an error or an unexpected cost and that he would need to clarify this point.
 - ACER representative notes that this is the opposite from what ACER would expect.

➤ **ENTSO-E to clarify the TERRE KPI for September for accuracy (with regard to demand volumes).**

3. Co-optimisation

ENTSO-E representative provides an update on Co-optimisation and asks market participants to provide a Bidding Guide. He adds that ACER deleted the unilateral linking in the CZCA Harmonised Methodology but understands it still that linking between balancing capacity products and DAM products remains part of co-optimisation. He asks market participants to provide an answer to

ENTSO-E by 15 January, and refers to the Explanatory Note provided in the EBSG meeting materials.

EBSG discusses:

- ACER representative asks if the bidding guide is needed, and why would not ENTSO-E just launch a public consultation asking some very clear questions instead of spending one year to get some input from market participants. He adds that the Explanatory Note does not show any clear questions that market participants should answer.
 - ENTSO-E representative points out that TSOs proposed unilateral linking. He adds that TSOs would like to ask the market participants to provide their inputs on the three points that are highlighted in the Explanatory Note.
 - ACER representative notes that this puts the burden on the market participants, and notes that a one-year period is too much, in their opinion. He asks the ENTSO-E representative to clarify, on the implementation footnote on slide 2, which type of R&D would be foreseen before 2026 or whether TSOs and NEMOs put everything on hold.
 - ENTSO-E representative mentions that R&D is a NEMOs action since it relates to the algorithm development, not a TSOs' one, and that it is fully up to NEMOs to decide when and how NEMOs run their R&D, and that TSOs are not taking part in that.
 - ACER representative indicates that there is nothing stopping NEMOs from starting the R&D. He asks why there is such a long period for the Bidding Guide, and that it seems that TSOs are trying to postpone co-optimisation or blame other parties for co-optimisation not moving forward.
 - ENTSO-E representative clarifies that the bidding guide does not impede the R&D to be done by NEMOs, but is rather be supplementary to that. As a reaction to ACER's comments, he notes that TSOs would like to give freedom to market participants on how market participants see the process, but that TSOs would provide their expertise to work further on co-optimisation.

EFET presentation

EFET representative responds to the Bidding Guide request and states that market participants are happy to engage in discussions about the necessity for bidding but highlights that EFET does not see co-optimisation as the way forward due to a gap between the theory to practical implementation. He provides sequential bidding as an illustration of his concern and adds that in terms of consequences, market participants will have to include premiums or reduce volumes at simultaneous markets, to account for the uncertainty involved.

EBSG discussions:

- EURELECTRIC representative states her support for EFET representative's comments and presentation and reminds that EURELECTRIC is sceptical about co-optimisation. She notes that ENTSO-E is putting forward deadlines when TSOs are not sure about the R&D themselves

and feasibility itself. She adds that EURELECTRIC could provide inputs to the Bidding Guide but points out that EURELECTRIC cannot be the only one developing the document. She clarifies that EURELECTRIC would need to limit themselves with qualitative feedback in the Bidding Guide, due to anti-competition rules, including key principles and features of the linking. She asks to be reassured that this qualitative feedback would be useful to R&D.

- EURELECTRIC representative further asked how TSOs intend to transpose the Bidding Guide into the next steps.
 - ACER representative agrees with the comments from EURELECTRIC, and on the need to continue working on R&D. On the input to the Bidding Guide, he states that ACER would not expect market participants to develop the whole Bidding Guide and it is TSOs who need to further clarify what it is needed.
 - EURELECTRIC representative clarifies that EURELECTRIC did not ask the R&D to continue now but wants first to clarify the linking issues and that EURELECTRIC also would like to raise attention to not set binding deadlines now.
 - ACER representative re-states their disagreement on the need of a year for the Bidding Guide exercise.
- EURELECTRIC representative asks for clarification if the implementation of co-optimisation is limited to the SDAC Algorithm Methodology, and that there would not be a back and forwards with the CZCA Harmonised Methodology.
 - ACER representative notes that, in the Algorithm Methodology, it should be more detailed how to integrate co-optimisation in the SDAC. He adds that ACER would expect to receive the Algorithm Methodology a month from now and that ACER would put forward a public consultation on their decision.
- **ENTSO-E is asked to consider providing to the market participants a request with clear questions from TSOs and NEMOs on the bidding guide, along with the clear way forward, clear scenarios, etc.**

4. Implementation Framework Survey

ENTSO-E representative provides an overview of the IF Survey outcomes and the next steps planning.

EBSG discusses:

- ACER representative asks if stakeholders consider it relevant to conduct the stakeholder survey in Q2 2024.
 - ENTSO-E representative asks market participants to state if Q2 2024 is too early for another stakeholder survey.
 - EFET representative states that it would be relevant to react in terms of the harmonisation progress and depending on the progress, there could be a need for new surveys depending on the rounds of harmonisation. He notes that it is too early to say.

- ACER representative clarifies that the next year's timeline could be kept until July 2025, but then the next one (third arrow) could be considered in the next EBSG.
- **ENTSO-E to come back to the question about the need for a new IF survey in 2024 in the April 2024 EBSG meeting.**

5. High Prices Mitigation Measures

ENTSO-E representative provides an update on the Stakeholder Webinar of 23 October and next steps, and states that the [public consultation](#) on potential amendments to the IFs and Pricing Methodology is open from 12 October to 12 December 2023. He explains the content of each of the measures in the consultation and asks stakeholders to provide feedback to the consultation. He adds that ENTSO-E will publish quarterly pricing reports from Q3 2023 on the ENTSO-E website by the end of 2023.

EBSG discusses:

- ACER representative asks about the slides of the 23 October Stakeholder Webinar and if ENTSO-E can share them.
 - ENTSO-E representative replies that the slides are available on the public consultation website.
- EURELECTRIC representative provides feedback on the voluntary elastic aFRR demand proposal and on the 23 October Stakeholder Webinar, noting that EURELECTRIC believes that elastic demand should not behave like a price cap. She asks for clarification on whether this concern has been considered.
 - ENTSO-E representative answers that the measures will not go above the necessary limits.
 - EURELECTRIC representative notes that the curves mentioned in Article 3.5 should be published in any case, and EURELECTRIC does not see why there would not be a reason why TSOs would not be transparent.
 - ENTSO-E representative states that TSOs have taken the content already approved in the mFRR IF as a template and see no need to go beyond this.
 - EURELECTRIC representative notes that TSOs are proposing changes in the demand curve, but this is an issue if it was not highlighted previously, and that ENTSO-E should consider the raised transparency concerns.
- ACER representative mentions that in Article 3(5), the reference should be to 4(c) instead of 4(b).
- ACER representative asks to clarify if TSOs' accessions are meant to be conditional upon the implementation of these proposed measures, should they be approved, or if that is not the case.
 - ENTSO-E representative notes that these concerns should be raised to NRAs.
 - ACER representative asks if TSOs have a plan in terms of the accession roadmaps and if there are plans for TSOs to join.
 - ENTSO-E representative notes that TSOs have approved the accession roadmap with conditionality elements stated in footnotes.
 - ACER representative asks for a clarification on one of the TSOs' technical issues to join the platforms, and if these issues are no longer of concern.

- ENTSO-E representative clarifies that those technical issues are fixed now, but as high prices are seen in the platforms, a TSO's NRA asked the TSO to include some mitigation measures to be able to connect to the platform. She adds that this TSO's connection is not only linked to technical issues but also linked to regulatory concerns.
- ACER representative is grateful for the clarification of the ENTSO-E representative on the technical readiness and their transparency.
- EFET representative states that their feedback has not been considered since the last EBSG meeting. He adds that transparency should be expanded as EFET questions the methodology applied and the thinking process of the mitigation measures.
 - ENTSO-E representative mentions that TSOs are not hiding anything, but from TSOs point of view, there are national concerns, which result in the way these mitigation measures were proposed.
 - EFET representative clarifies that EFET did not make remarks about mitigation measures specifically, and that instead EFET asked to give markets a heads up. He further notes that the other statement EFET made is that there is limited attractiveness to participate in the market for several reasons, including that market participants are facing unprecedented regulatory risks, and the evaluation is taking as a given that there is exercise of market power.
 - ENTSO-E representative clarifies that TSOs did not say that there is an exercise of market power, and TSOs did not state something like this in the document. He clarifies that literature referred to in the explanatory note clearly underlines that the given conditions at EU balancing energy markets makes the exercise of potential market power more likely.
 - EFET representative adds that EFET suspects that none of the measures would increase the attractiveness of new market parties and that general issues would not be resolved.
 - ENTSO-E representative notes that under much more restrict national market conditions as the harmonised EU market conditions new assets enter into the market (such as batteries) and that therefore the argument of non-attractiveness is at least questionable.
 - EFET representative follows up stating that TSOs are judging the efficiency of the market.
 - ENTSO-E representative clarifies that EB Regulation states that TSOs could add measures to ensure the efficient working of the market, and that it is obvious that balancing energy market in Europe is not meeting the requirements for an efficient functioning. He refers to the explanatory document which elaborates that certain conditions lead to inefficiencies and TSOs need to limit this inefficiency.
- EURELECTRIC representative states that EURELECTRIC's feedback at the previous EBSG meeting has not been considered enough either. She notes on the price cap, that it is too early to put forward these mitigation measures. Furthermore, she adds that there is no economic rationale for marginal pricing.
 - ENTSO-E representative notes that there are disparities in the messages provided by EURELECTRIC members at the national level and at the European level.
 - EURELECTRIC representative clarifies that EURELECTRIC is not opposed to the

mitigation measures, and that the feedback provided is a consolidation of national feedback.

- NRA representative states that, regardless of the proposed mitigation measures (which look reasonable from the NRA's side), there is a legal obligation to join the platforms by the end of the derogation deadline. He adds that, from a legal point of view, it is not possible to postpone or cancel the connection to a balancing platform dependent on the outcome of the approval process of these mitigation measures.
 - ENTSO-E representative replies that the EB Regulation contains provisions on derogations, and that derogations are up to NRA's approval and are thus a national responsibility. He adds that the project planning on platform level and presented in accession roadmaps is based on pure national implementation planning.

➤ **ENTSO-E to correct the reference in Art. 3(5) to 4(c) instead of 4(b).**

6. Transparency platform updates

ENTSO-E representative provides answers to raised points in the previous EBSG meeting relevant to EB Regulation as well as an overview of the recent developments and next steps for the Transparency Platform workplan. He adds that Nijat Gasimov (ENTSO-E) would take the role of Market Advisor on the Transparency Platform and asks stakeholders to refer to him in the future.

a. ENTSO-E feedback on questions from previous EBSG meeting

1. ENTSO-E and Transparency Platform experts from TSOs are expected to discuss internally whether to transfer the historic data from the gap solution location Transnet website published there before Q1 2023 to the Transparency Platform.

ENTSO-E representative notes that netted and exchanged volumes are transferred to the Transparency Platform. He states that the change request on cross-border marginal prices was deployed at the Transparency Platform on 17 October, and the data is ready to be transferred.

EBSG discusses:

- ACER representative asks ENTSO-E's representative to send an email to EBSG members when the transfer of Cross Border Marginal Prices data is ready.
 - ENTSO-E representative answers that he will send an update email to EBSG members once the Cross Border Marginal Prices data is published on the Transparency Platform.
 - EFET representative asks if there are plans to decommission the Transnet website.
 - ENTSO-E representative replies that ENTSO-E needs to start to decommission it and that there should be one source of information, but there is no deadline yet to do so.
2. ENTSO-E and Transparency Platform experts from TSOs to research the possibility of clarifying the definition of the batteries for the purpose of data reporting and to report the data for batteries separately on the Transparency Platform.

ENTSO-E representative replies that on 22 November there will be an ENTSO-E Transparency User Group (ETUG) meeting to share the proposal on Energy Storage and stakeholders can provide their views then.

EBSG discusses:

- EFET representative asks for a clarification about the timeline and, as there is a week for stakeholders to react, he asks if ENTSO-E representative can share the document before the end of November.
 - ENTSO-E representative states that the proposal can be shared before other materials are ready to give stakeholders time for feedback.
- 3. ENTSO-E and Transparency Platform experts from TSOs are expected to add a description for balancing data on the Transparency Platform and consider creating a correspondence or explanatory table to support Transparency Platform data querying.

ENTSO-E representative notes that this has been implemented and that data descriptions are updated for all Balancing domains on interoperability tests (IOP) & production, and that ENTSO-E has updated the Graphical User Interface (GUI) titles and subtitles. He states that if no other comments today, ENTSO-E should close this topic.

EBSG discusses:

- ACER representative notes that the reason the topic was left open was to allow stakeholders to provide feedback, and that otherwise it could be closed.
 - EFET representative notes that EFET has not received any comments and accepts to close the topic.
- **ENTSO-E to send an update email to EBSG members once the Cross Border Marginal Prices data is published on the Transparency Platform.**

7. Closing and next steps

Reminder on next meetings:

- a) [Balancing Platforms Stakeholders' Workshop](#) (online): 30 November
- b) EBSG dates for 2024 are announced: 17 April and 6 November (physical/hybrid meeting in Brussels)

EBSG discusses:

- EFET representative asks whether an additional EBSG meeting can be held sometime following the TSOs' accessions in July 2024.
 - ACER representative notes that there is a possibility to have an additional meeting in case of a need, but this can be decided on an ad-hoc basis.

ENTSO-E representative and ACER representative thank the participants and close the meeting.