

Electricity Balancing Stakeholder Group (EB SG) Meeting

Date: 6 November 2024

Time: 10:00-15:00

Place: Physical meeting (CEER premises, Cours Saint-Michel 30a, 1040 Brussel) & telco

Participants

No.	Surname	Name	Company	Present (Y/N)
1.	Radanovic	Heni	ACER	Y
2.	Fransen	Mathieu	ACER	Y
3.	Pavesi	Marco	ACER	Y
4.	Viehhauser	Martin	ACER	Y
5.	Tellidou	Athina	ACER	Y
6.	Bertrand	Gilles	ACER	Y
7.	Brantl	Christina	ACER	Y
8.	Bitoiu	Viviana	ANRE	N
9.	Dutoiu	Mirela	ANRE	N
10.	Rossi	Stefano	ARERA	Y
11.	Cariello	Francesco	ARERA	N
12.	Klap	Sam	ACM	N
13.	Guillaume	Henri	ACM	Y
14.	Behrens	Simon	BNetzA	Y
15.	Khun	Rose	BNetzA	Y
16.	Zwinka	Barbara	BNetzA	Y
17.	Lob	Nathalie	BDEW	N
18.	Goulley	Thomas	CRE	N
19.	Fortanier	Vincent	CRE	Y
20.	Maenhoudt	Marijn	CREG	Y
21.	Nieto Sandoval Martín de la Sierra	Antonio	CNMC	N
22.	Kabinger	Alexander	E-CONTROL	N
23.	Ishii	Eveliina	Energiavirasto	Y
24.	Roldão	Pedro	ERSE	N
25.	Speicher	Yves	ILR	N
26.	Karpavičiūtė	Lina	NERC	N
27.	Kellerer	Alexander	NVE	Y
28.	Bilstad Neraasen	Sigrid	NVE	Y
29.	Denninger	Bjorn	Forsyningstilsynet	Y

No.	Surname	Name	Company	Present (Y/N)
30.	Studente	Vija	SPRK	N
31.	Bieļa-Dailidoviča	Edīte	SPRK	Y
32.	Van den Beld	Matthieu	VEMW	Y
33.	Orzechowski	Adrian	URE	N
34.	Chlusta	Michal	URSO	N
35.	Jantzen	Annette	EUGINE	N
36.	Van Staveren	Rick	Energie-Nederland	N
37.	Weiss	Arnold	EPEX-SPOT	N
38.	Stretti	Michele	Europex	Y
39.	Van den Kerckhove	Olivier	Eurelectric	Y
40.	Peerhossaini	Donia	Eurelectric	Y
41.	Schneider	Max	Eurelectric	Y
42.	Beckstedde	Ellen	FSR	Y
43.	Dembi	Vidushi	WindEurope	N
44.	Boussetta	Selim	<u>Eurelectric</u>	Y
45.	Teske	Stephan	Uniper	N
46.	Holm	Inger Kristin	CERRE	N
47.	Buhr Broge	Astrid Buhr Broge	Green Power Denmark	N
48.	Jantzen	Annette	EUGINE	N
49.	Janson	Stefan	Energy Traders Europe	Y
50.	Biglia	Lorenzo	Energy Traders Europe	Y
51.	De Chambure	Cyprien	SIA-Partners	Y
52.	Schlipf	Dominik	ENTSO-E	Y
53.	Marcina	Kristine	ENTSO-E	Y
54.	Vakhtangishvili	Nino	ENTSO-E	Y
55.	Costa	Daniel	ENTSO-E	Y
56.	Brandauer	John	ENTSO-E	Y
57.	Marcenac	Ludivine	ENTSO-E	N
58.	Vrolijk	Ruud	ENTSO-E	Y
59.	Brun	Vanessa	ENTSO-E	N
60.	Thies	Marlon	ENTSO-E	Y
61.	Steber	David	ENTSO-E	Y
62.	Linnemann	Christian	ENTSO-E	N
63.	Maier	Sarah	ENTSO-E	Y
64.	Kasper	Ulf Sebastian	ENTSO-E	N
65.	De La Fuente	Jose Ignacio	ENTSO-E	N
66.	Cinque	Adriano	ENTSO-E	N
67.	Kasper	Ulf	ENTSO-E	N
68.	Pflanzer	Vaclav	ENTSO-E	Y
69.	Dalena	Michele	ENTSO-E	N
70.	Martina	Pede	ENTSO-E	N
71.	Peregrina Mayoral	Ester	ENTSO-E	N
72.	Pascua Baron	Miriam	ENTSO-E	Y
73.	Pierreux	Nicolas	ENTSO-E	Y
74.	Onofrej	Jakub	ENTSO-E	N

No.	Surname	Name	Company	Present (Y/N)
75.	Džačovský	Tomáš	ENTSO-E	N
76.	Linnemann	Christian	ENTSO-E	N
77.	Smolira	Kamil	ENTSO-E	N
78.	De La Cueva Garcia-Hirschfeld	Javier	ENTSO-E	Y
79.	De Haan	Jerom	ENTSO-E	Y
80.	Kostov	Milen	ENTSO-E	Y
81.	Gasimov	Nijat	ENTSO-E	Y

Contents

1. Welcome and Introduction	4
2. Balancing platform updates.....	4
2.1. General update.....	4
2.2. MARI	4
2.3. TERRE.....	4
2.4. PICASSO	5
2.5. IGCC.....	5
3. Implementation Framework (IF) Survey: harmonisation needs	5
4. CZC allocation harmonised methodology	6
5. NCDR	7
6. Co-optimisation update.....	7
7. Transparency Platform (TP).....	9
8. AOB, Next Steps and Closing remarks	9
8.1. 2024 Balancing Platforms Stakeholder workshop.....	9
8.2. Proposed EBSG dates for 2025.....	9

Minutes

1. Welcome and Introduction

ACER representative and ENTSO-E representative welcome participants and introduce the agenda.

2. Balancing platform updates

2.1. General update

ENTSO-E representatives present a general update about all European balancing platforms, including the accession roadmap status as well as the status of the implementation of high price mitigation measures implementation in the aFRR pricing algorithm.

EBSG discusses:

- Energy Traders Europe representative asks, with regards to slide 9, whether the data profile would look similar if the time period changed.
 - ENTSO-E representative responds that it depends on the merit order structure. The general price level is a little bit lower, so the overall price level is generally reduced.
 - Energy Traders Europe representative notes that the amount paid for pay-as-bid cleared will increase as you will have more situations in which BSP is remunerated at its bid price.
 - ENTSO-E representative elaborates that the volume of pay-as-bid bids does not change and suggests that this question can be investigated.
- Energy Traders Europe representative asks whether there was any difference in the behaviour of market participants observed since the methodology change.
 - ENTSO-E representatives respond that the behaviour change was observed, but it was more due to seasonal effects like the heating season. Additionally, ENTSO-E representatives consider it too early to derive conclusions on changes of bidding behaviour.
 - Energy Traders Europe representative asks whether lower prices were observed in October.
 - ENTSO-E representative clarifies that October is included in the analysis and that the market participants can do the same assessment themselves as the data is publicly available. He further adds that since TenneT NL joined the PICASSO platform, the number of incidents has reduced.

2.2. MARI

ENTSO-E representative explains the latest developments in MARI, including the latest go-live of Baltic TSOs.

2.3. TERRE

ENTSO-E representative explains the latest developments in TERRE.

EBSG discusses:

- Energy Traders Europe representative highlights that Terna plans to disconnect from the TERRE platform on 1 January 2025 and asks about the plans of other TSOs to withdraw from the operational participation in the TERRE platform sooner than the communicated timeline.
 - ENTSO-E representative replies that while some TSOs may withdraw sooner, others still plan to stay until December 2025.
 - ACER representative clarifies that the detailed timeline of TERRE decommissioning was also presented in the webinar organised by the TERRE TSOs in May 2024.
- ACER representative notes that a TSO cannot just exit the TERRE platform because operational processes need to change first and asks how TSOs manage that.
 - ENTSO-E representative replies that TSOs are in contact with their NRAs on this topic. NRA representative confirms.
 - ACER representative asks whether TSOs' exits from TERRE and accessions to MARI are mirroring each other in terms of the number of TSOs.
 - ENTSO-E representative responds that, while RR and mFRR products are partly similar, when a TSO joins or exits balancing platforms is a national issue.
- Eurelectric representative asks about the operational workstream of decommissioning.
 - ENTSO-E representative responds that this concerns the submission of data to the Transparency Platform, as well as to CMM.

2.4. PICASSO

ENTSO-E representative explains the latest developments in PICASSO, including the most recent go-live of Energinet, TenneT NL and SEPS.

EBSG discusses:

- ACER representative notes about the usual process of pre-netting in PICASSO and post-netting in IGCC and asks about the possibility of explaining this process and its consequences to market participants.
 - ENTSO-E representative suggests that the 11 December annual Balancing Platforms webinar would be the best place to clarify these processes.
- Eurelectric asks about the re-accession date for Terna to the PICASSO platform.
 - NRA representative responds that there was no clear date set yet.

2.5. IGCC

ENTSO-E representative explains the latest developments in IGCC.

3. Implementation Framework (IF) Survey: harmonisation needs

ENTSO-E representative provides an overview of the Implementation Frameworks (IF) Survey 2024 and the next steps, including the upcoming public consultation.

EBSG discusses:

- ACER representative notes that there is no need to wait for the NCDR finalisation before proceeding with the harmonisation and standardisation efforts as the Framework Guideline has already been

approved.

- ACER representative notes that several harmonisation proposals by TSOs appear to be very detailed and of a nature that can be resolved at the national level. He further asks whether this is considered necessary.
 - Energy Traders Europe representative suggests that the Terms & Conditions (T&Cs) and the data provisioning should be differentiated. For market participants, the ENTSO-E Transparency Platform (TP) operational data is not meeting requirements and expectations, while the data provided by connecting TSOs is meeting those requirements. Therefore, the connecting TSO approach (e.g., German TSOs) should be considered the default approach for all TSOs.
 - ENTSO-E representative comments that the TP issue will be addressed under another agenda point today, but TSOs are of the opinion that a harmonised data submission approach indeed should be the way forward in order to harmonise TSO-BSP interactions.
 - ACER representative reiterates that ENTSO-E and TSOs' efforts should be focused on improving the TP to the level that meets stakeholders' expectations.
- ACER representative notes that the topic of data exchange standards is very challenging, but it is instrumental in a lot of operational processes. Therefore, he advises that things that can be kept national should be kept national and only things that have to be European should be European.
- TSO representative asks market participants whether IT harmonisation is viewed as a key enabler of European harmonisation.
 - Market Participants' representatives confirm.

4. CZC allocation harmonised methodology

ACER representative provides an overview of the recent developments and next steps for the CZCA Harmonised Methodology (HCZCAM).

ENTSO-E representative provides an update on the COBRA project.

EBSG discusses:

- Eurelectric representative inquires about ACER's process.
 - ACER representative clarifies the next steps, as per the slides, and confirms that this is the standard process.
- Energy Traders Europe representative asks what is the aim of this project, if the forecasting errors and penalties methodologies are included and whether all TSOs involved in the COBRA project plan to apply the HCZCAM.
 - ENTSO-E representative explains that the COBRA project is there to develop the algorithm, but it is up to TSOs and regional TSO balancing capacity cooperations to decide whether to use it and to develop those methodologies. She notes that for existing applications – Nordic and soon Baltic – there is an obligation to switch from their regional market-based methodology to the HCZCAM.
- Energy Traders Europe representative asks about the involvement of RCCs in the COBRA project and the algorithm development.
 - ENTSO-E representative elaborates that, as per the RCC Procurement Methodology, RCCs have also a role in the process of interface development. Therefore, TSOs interact with RCCs within the COBRA project.

5. NCDR

ACER representative provides an overview of the recent developments and the ACER's decision-making process on the Network Code Demand Response (NCDR).

EBSG discusses:

- ENTSO-E representative inquires about integrating aggregation models related amendments into the Imbalance Settlement Harmonisation Methodology (ISHM). He adds that, if this is required, then EB Regulation should be amended first.
 - ACER representative replies that Art. 18 of EB Regulation, in the ACER's public consultation package, already has the proposed provisions. Therefore, once the amendments are adopted, there should be amendments to the national T&Cs and the ISHM.
 - ENTSO-E representative notes that this may not be the optimal order of steps as a general definition of aggregation model may first required before it can be further defined how those should be incorporated in the subsequent market processes or in other methodologies.
 - ACER representatives reply the EB Regulation amendments that are currently being finalised would introduce aggregation model definitions and requirements to harmonise national approaches, and subsequently, ISHM would harmonise provisions at the national level.
- ENTSO-E representative asks about the specific timelines for the ISHM amendment.
 - ACER representatives respond that there is timeline for the entire process, but not of each interim step. For ACER, the final deadline of implementation of all processes as they relate to NCDR is important, which is around the 2027-2028 timeline.
- ENTSO-E representative asks about ACER's request for TSOs and DSOs to take the initiative for the Demand Response Stakeholder Group.
 - ACER representative clarifies that the group will be organised by ACER and NRAs, so no organisational efforts are required by TSOs and DSOs for now.
- Eurelectric representative asks whether comitology in 2025 will cover EB Regulation and whether amendments will be limited to NCDR topics only.
 - ACER representatives confirm that ACER's proposal to the European Commission (EC) was that the comitology process by the EC should include EB Regulation amendments but be only limited to the NCDR-related amendments, excluding any EB Regulation 2.0. amendments (i.e., the entire scope of EB Regulation).
 - ENTSO-E representative asks ACER to provide TSOs with the legal basis for the EC to perform only NCDR-targeted amendments to EB Regulation.
 - ACER representative responds that there is no specific provision that addresses this scope revision, it is just the standard process followed by the EC that the targeted revisions and full revisions processes are separated.
 - ENTSO-E representative states that, as per TSOs understanding, TSOs can also propose amendments to EB Regulation to ACER at any time.

6. Co-optimisation update

ENTSO-E representative provides an update on the latest co-optimisation developments, informal survey of the market participants and the ongoing Research & Development (R&D) activities.

Energy Traders Europe and Eurelectric representative expresses appreciation to TSOs and NEMOs for organising the informal survey on co-optimisation among market participants and presents about uncertainty around the

co-optimisation benefits.

EBSG discusses:

- Eurelectric representative inquires about the interviews of the individual participants who submitted responses to the informal co-optimisation survey.
 - ENTSO-E representative replies that all responses will be first screened, and then individual respondents will be approached for scheduling additional interviews.
- Eurelectric representative asks if the date for the follow-up physical workshop was set.
 - ENTSO-E representative states that the likely date will be 19 December and that the workshop will be organised in the hybrid mode with the possibility to also attend remotely.
- Eurelectric representative welcomes this first draft planning as MPs' involvement is key to ensure that the work delivers actionable results. Eurelectric representative asks for more detailed planning and underlines that 1-month public consultation every once in a while, is not sufficient considering the topic at hand, the need to involve busy experts and the need to think through the questions asked. Eurelectric representative asks that more visibility is provided to market participants on the content of the public consultation ahead of time.
 - ENTSO-E representative responds that the deadlines and timeline are driven by ACER's decision from 23 September 2024. Since the deadline for the final report is September 2025, it may not be possible to extend the public consultation further. However, TSOs will discuss with NEMOs the possibility of sharing more information ahead of time.
- ACER representative asks about the source of the remarks on the "heavy redesign of market concepts" similar to "US style markets" in the slide deck of the Eurelectric and Energy Traders Europe.
 - Energy Traders Europe representative responds that this is coming from 11 October webinar organised by TSOs and NEMOs.
 - ACER representative states that ACER's conceptual proof-of-concept study shall not be viewed as the exact market design to be implemented in Europe. The subsequent Research & Development (R&D) steps will further get into what design provisions will be needed and not needed in the European context.
 - Energy Traders Europe representative notes that if ACER's conceptual proof-of-concept study was fully theoretical consideration, it is hard to see how co-optimisation can be applied in reality.
 - ACER representative replies that any theoretical study needs to rely on assumptions, but that does not take away from the relevancy of the study. He emphasises that the theoretical study is not the same as the practical implementation approach.
- Energy Traders Europe representative raises a concern about co-optimisation causing liquidity issues in the market if we lose the sequential bidding process, but our point is more to research it further.
 - ACER representative invites market participants to provide further details about the liquidity concern.
 - ENTSO-E representative states that the default approach should assume that the current level of liquidity in the market should be guaranteed under co-optimisation. The algorithm, if well designed, should deliver benefits. For TSOs, it is still a concern whether R&D allows for enough time to investigate all aspects of the well-designed algorithm, due to some short-cut assumptions.
 - Energy Traders Europe representative notes that in the co-optimisation set-up, the same level of liquidity cannot be offered to the market as in the sequential approach. Market participants do not want any arbitrary algorithms governing market outcomes and their bids.
 - ENTSO-E representative confirms that the liquidity concern will be also passed on to the group working on the R&D but solution has to ensure sufficient market liquidity.
 - Eurelectric representative notes that ACER clarified that substantial redesign are out of the scope of the R&D and underlines that such misunderstanding is the result of insufficient sharing

of information. Eurelectric representative notes that market participants would appreciate more interactions during the ongoing R&D.

7. Transparency Platform (TP)

Energy Traders Europe and Eurelectric representative presents the market participants feedback on the use of the TP.

EBSG discusses:

- ENTSO-E representative thanks the Energy Traders Europe and Eurelectric for the feedback provided.
- ENTSO-E representative provides responses to the raised concerns by the market participants. On the frequent slowdowns in data upload and display, he states that the TPR2 is reaching its limits and, therefore, a switch to TPR3 is taking place, which will have more resilient architecture redesign. He adds that the existing performance issues in new TP is due to ongoing development and that new TP is not yet delivered.
- ENTSO-E representative notes that timely data upload to the TP is the responsibility of the data providers and not TP administrators.
 - Eurelectric asks whether TSOs or Balancing Platforms can provide data more quickly to the TP.
 - ENTSO-E representative explains the process for data provision to the TP from the Balancing Platforms.
 - ENTSO-E representative asks whether it is of the highest importance to the market participants to have the merit order list available that quickly and what are the reasons for the need to have that data available earlier. He invites market participants to provide an explanation.
- ENTSO-E representative clarifies that the change request on the enhanced options for data export and filtering need to be submitted to ENTSO-E by market participants and then it will be reviewed.
- ACER representative asks whether the new TP will be the only official data source.
 - ENTSO-E representative confirms that it is the case from September 2025 and that the transition period has already started.
- ACER representative asks whether the transition to the new TP will only be, in practice, the transition of data between the environments, or whether it entails something more.
 - ENTSO-E representative explains that there are two projects - TP Vision and TP Re-design – and neither of these projects address changes in the data requirements or data provisions; both are related to the upgrade of platform.
- ACER representative asks whether there are any ACER representatives in ETUG meetings.
 - ENTSO-E representative confirms.

8. AOB, Next Steps and Closing remarks

8.1. 2024 Balancing Platforms Stakeholder workshop

ENTSO-E representative notes that the 2024 Balancing Platforms Stakeholder workshop will take place online on Wednesday, 11 December. She invites EBSG members to see [ENTSO-E webpage](#) for further information and registration.

8.2. Proposed EBSG dates for 2025

ENTSO-E representative and ACER representative note that EBSG dates for 2025 are the following two meetings

with both of them being physical:

- Wednesday, 2 April (physical);
- Tuesday, 28 October (physical).

EBSG participants confirm that they prefer to organise both meetings in 2025 in Brussels.

ENTSO-E representatives note that physical participation should be encouraged, independent of the location.

- **ENTSO-E representative is asked to send out the meeting invitations to all EBSG members for 2025 EBSG meetings.**

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