

Electricity Balancing Stakeholder Group (EB SG) Meeting

Date: 2 April 2025

Time: 10:00-15:00

Place: Physical meeting (ENTSO-E Office, Rue de Spa 8, 1000 Brussels) & telco

Participants

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

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

No.	Surname	Name	Company	Present (Y/N)
74.	Dalena	Michele	ENTSO-E	N
75.	Martina	Pede	ENTSO-E	N
76.	Peregrina Mayoral	Ester	ENTSO-E	N
77.	Pascua Baron	Miriam	ENTSO-E	N
78.	Pierreux	Nicolas	ENTSO-E	N
79.	Onofrej	Jakub	ENTSO-E	Y
80.	Džačovský	Tomáš	ENTSO-E	N
81.	Linnemann	Christian	ENTSO-E	N
82.	Smolira	Kamil	ENTSO-E	N
83.	De La Cueva Garcia-Hirschfeld	Javier	ENTSO-E	Y
84.	De Haan	Jerom	ENTSO-E	Y
85.	Mirzaee Kakhki	Mahla	ENTSO-E	Y
86.	Acevedo Perosanz	Guillermo	ENTSO-E	Y
87.	Kostov	Milen	ENTSO-E	Y
88.	Gasimov	Nijat	ENTSO-E	Y
89.	Cerman	Anton	ENTSO-E	Y
90.	Luz	Joao	ENTSO-E	Y
91.	Petsinis	Konstantinos	ENTSO-E	Y
92.	Piskarov	Iaroslav	ENTSO-E	Y

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Minutes

1. Welcome and Introduction

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

2. Co-optimisation

2.1. R&D on Co-optimisation update

ENTSO-E representative presents a general update about Research & Development (R&D) activities on co-optimisation, explaining that a statement about its feasibility would only be possible after the completion of the successive research phases.

EBSG discusses:

- Energy Traders Europe representative asks how market participants will be involved after the public consultation.
 - ENTSO-E representative replies that there will be further involvement from Q2 2025 and as soon as a clear plan for market participants engagement is available it will be shared, similar to the market participants survey in October – November 2024.
 - ENTSO-E representative notes that TSOs and NEMOs appreciate market participants' involvement in the process so far. He adds that there are already indications that may put in question the implementation of co-optimisation, which are also resulting from the reflection of intraday situation in ACER's 2024 study; hence, it is important that if co-optimisation is pursued further, it is done in a way that maximises social welfare.
- Eurelectric representative remarks that they appreciated being involved to date in TSOs and NEMOs processes, noting that they would like to continue cooperation in a constructive manner but that scepticism about the co-optimisation concept remains and electricity markets should not "sleepwalk" into its implementation.

2.2. Energy Traders Europe position paper on Co-optimisation R&D

Energy Traders Europe representative highlights that Eurelectric and Energy Traders Europe have developed the position paper on Co-optimisation, which includes some of the concerns of market participants on the topic.

EBSG discusses:

- ENTSO-E representative notes that the current obligation of TSOs and NEMOs is to only conduct an R&D study, and then further steps will be decided based on that study. He notes that, as per TSOs' understanding, ACER acknowledged that all relevant questions to pursue Co-Optimisation further may not be addressed in the current R&D phase and further work will need to be done.
- ENTSO-E representative asks about Eurelectric and Energy Traders Europe's position on the cost-benefit activities (CBA) and what are their concerns.
 - Energy Traders Europe representative states that market participants are concerned that a decision may be made even before the R&D conclusions are available, complexity and further risk of decoupling should be further studied.
- ACER representative notes that the scope of R&D activities was made clear in ACER's decision from

September 2024, noting that a comprehensive CBA is out-of-scope and has never been performed for any other market design decisions previously. He also adds that ACER is well aware that several questions need to be addressed by TSOs and NEMOs before any decision on how to pursue Co-Optimisation can be made.

- Energy Traders Europe representative notes that the need for a CBA was exactly the concern raised in the position paper. The boundaries referred to in this position paper have been touched upon in previous EBSG meeting as well as possible implication of a market design with unit-based bidding (as outlined in ACER's study).
- ACER representative responds that ACER is not advocating for any bidding option and emphasises that currently TSOs and NEMOs are investigating several options, including also portfolio-based ones. He notes that there are three phases of R&D and all three of these phases will need to be taken into account when any further decision is made, not only phase 1 which is currently ongoing. All of the bidding options are being considered currently, so no conclusions are being precluded by ACER before the two years of R&D are completed.
- ENTSO-E representative notes that there may be also different interpretations of the outcomes of the R&D. Therefore, the conclusions of R&D will need to be made very carefully.
- Energy Traders Europe representative emphasises that market participants would like to be involved in qualitative assessment and interpretation of R&D outcomes.

3. Harmonised cross-zonal capacity allocation methodology – ACER Decision

ACER representative provides an overview of the recent developments and ACER's decision on the CZCA Harmonised Methodology (HCZCAM).

EBSG discusses:

- Eurelectric representative asks whether TSOs would have the possibility to submit an amendment to remove the forecasting methodology pursuant to Art.18 as advised by Nordic NRAs.
 - ACER representative replies that this request was not accepted and that TSOs would have to implement the forecasting once other TSOs join the applications.
 - Energy Traders Europe representative asks about Art. 16(2) interpretation and whether the sequential procurement of aFRR and mFRR is feasible.
 - ACER representative replies that if aFRR and mFRR are in different areas, then these areas need to be merged. He also clarifies that two distinct aspects need to be considered: the procurement of the products, i.e. the gate closure time, and the allocation of bids and cross-zonal capacity to each of them. While the HCZCAM requires that the gate closure time has to be unique for all products, it would need to be double checked whether there is an obligation to clear all products in a single auction (in case more than one product is procured) or whether there can still be two separate auctions for aFRR and mFRR.
 -
- **ACER is asked to confirm the interpretation of Art. 16(2) of the CZCA Harmonised Methodology (HCZCAM) with respect to the possibility of sequential clearing of aFRR and mFRR.**
- ACER feedback: According to Article 6(4) of the HCZCAM, if a TSO is involved in an application with two or more standard balancing capacity products and BSPs submit cross-product linked bids, a joint clearing of all concerned products is inevitable. More generally, in case of any interdependence (e.g. different applications in a flow-based capacity calculation region or different products competing for the same cross-zonal capacity), there has to be a single optimisation for them.

4. Balancing platform updates

4.1. MARI

ENTSO-E representative explains the latest developments in MARI.

EBSG discusses:

- Eurelectric representative asks about the chart on slide 10 of the presentation and whether ENTSO-E could perform an analysis of price volatility in its upcoming monitoring .
 - ENTSO-E representative replies that quarterly hourly prices may be challenging to represent on a single chart, but MARI TSOs will see how this data can be presented.
 - NRAs representative asks from where they can get the latest MARI data like price, volume, cross border activated mFRR bids, etc.
 - ENTSO-E representative refers to the balancing section of [ENTSO-E Transparency Platform](#).
- **MARI TSOs are asked to consider whether more detailed data (e. g. on price volatility) can be presented on the mFRR UP and DOWN submitted bids.**

4.2. PICASSO

ENTSO-E representative explains the latest developments in PICASSO.

EBSG discusses:

- ENTSO-E representative confirms that RTE is now connected to PICASSO as of 2 April 2025.
- ACER representative asks about the data presented on slide 24.
 - ENTSO-E representative responds that the 10% on the chart is related to monthly averages. Monthly on average, 10% of submitted volumes are activated in both directions. He adds that demand is equally distributed in both directions, so even if the data was split it would have been more or less equally distributed.
 - ACER representative suggests splitting the direction up and down and notes that this could show better what the need vs. the offer is.
 - ENTSO-E representative also stated that the average value might be misunderstood or misinterpreted. TSOs demand is, from time to time 100%, or even more, of the available amount of balancing energy.
- Eurelectric asks about the deadline for the latest accessions and if there are any other limitations.
 - ENTSO-E representative responds that, usually, more than three TSOs are not supposed to access in the same month due to technical limitations. Also, several accessions within a week are challenging. However, March was an exceptional month with six TSOs accessing.

4.3. IGCC

ENTSO-E representative explains the latest developments in IGCC, including the latest accessions.

4.4. TERRE

ENTSO-E representative explains the latest developments in TERRE, including legal consequences of the stop of the usage of RR products and the stop of platform usage.

EBSG discusses:

- Energy Traders Europe representative asks about the timeline for the disconnection of the four remaining TSOs and how will this be communicated (i.e. nationally or via ENTSO-E?)
 - ENTSO-E representative explains that no precise date for disconnection could not be provided yet. Communication will be at national level and an announcement on the ENTSO-E webpage is foreseen.
- ENTSO-E representative asks about higher demand and even higher bid volume available in April, as presented on the chart in the slides.
 - ENTSO-E representative responds that this corresponds to the economic surplus that was observed.

5. T&C harmonisation

5.1. TSOs update

ENTSO-E representative provides an overview on the recent developments regarding T&C harmonisation.

EBSG discusses:

- Eurelectric representative asks when the options and proposals will be shared with the market participants before the public consultation in Q3 2025.
 - ENTSO-E representative responds that TSOs just presented within this EBSG meeting the different options representing a summary of the previous public consultation in 2024, but the next time the materials will be put forward for the market participants' feedback will be in Q3 2025.
 - Eurelectric representative asks whether further insights into the content of the proposals may be shared in the next MESC in the summer.
 - ENTSO-E representative replies that TSOs will see what is possible to share in MESC, but most likely the next information will be shared already during the public consultation. Also, MESC is not considered the right format to exchange about EB Regulation related proceedings.

5.2. Energy Traders Europe reaction on T&C harmonisation

Energy Traders Europe representative provides a reaction to the recent developments regarding T&C harmonisation, including the proposals for the topics to be covered in the future survey or consultation on T&C harmonisation.

EBSG discusses:

- ENTSO-E representative notes that the Imbalance Settlement harmonisation is not included in the current amendment process because this content is not in scope for the harmonisation of T&Cs for BSPs following the IFs, but also due to the immature market feedback currently available (i.e., until now still several TSOs have not joined the balancing platforms). He adds that the commercial topics were put on hold to wait until the market was more mature, as also indicated in summary of IF survey feedback in November 2024 EBSG meeting. He further notes that NCDR will further harmonise provisions regarding aggregation, which will also address some of the market participants' doubts. Therefore, there are several parallel streams where the topic of harmonisation is being addressed.
- Energy Traders Europe representative asks which controls for T&C compliance are in place for existing and new balancing platform participants.
 - ACER representative responds that there is no explicit compliance check on aggregation and harmonisation, but generally ACER is checking compliance on various methodologies. He

confirms that the delay in TSO accessions also results in the delay of subsequent steps, like further harmonisation.

- ENTSO-E representative notes that Imbalance Settlement harmonisation is already to a certain level harmonised, acknowledging that from the market participants' perspectives there may be further opportunities for improvement of harmonisation.
- ENTSO-E representative supplements that TSOs are looking for a balance of making only necessary harmonisations to avoid adverse impacts on certain market aspects. He adds that there may exist a saturation level of harmonisation, after which any further harmonisations are no longer beneficial.
- Energy Traders Europe representative notes that with new TSOs joining the balancing markets will result in deviations and have impacts from day one.

6. Data quality assessment

ACER representative provides an overview of the data quality assessment.

EBSG discusses:

- ENTSO-E representative asks how the data quality will be measured and which quality parameters will be used.
 - ACER representative responds that there has been no decision made on this yet and confirms that ACER will share this information when available.
 - ENTSO-E representative notes that the Transparency Platform (TP) also has the CCUG (Co-creation User Group) which is coordinating with ACER. He asks ACER to share within the CCUG the quality assessment parameters so that TSOs can provide feedback and have time to react in a timely manner.
 - ENTSO-E representative provides feedback to ACER about the raised feedback on slide 3. In particular, there is data migration plan and transition plan available on the TP in the news section. He adds that User Guides are also published on the Transparency Platform.
 - ACER representative asks when the TP data migration is going to be finished.
 - ENTSO-E representative replies that all TP data provided by users is already available.
- **ACER is asked to share data quality assessment criteria with the ENTSO-E Transparency Platform group to ensure that TSOs are aware and ready to react in a timely manner.**

7. AOB

7.1. Practical information

To avoid confusion, the ENTSO-E Secretariat representative asks to forward to other attendees the correct meeting invite (sent by ENTSO-E Secretariat and not the one automatically generated by MS Teams during the registration).

7.2. Post-meeting survey

ENTSO-E representative asks attendees to complete a brief survey about their meeting experience. This survey outcome will be used for any potential future meeting improvements.

EBSG discusses:

- ENTSO-E representative proposes to merge the annual Balancing Platforms stakeholder workshop and the November EBSG meeting in order to incentivise further physical participation by attendees, but also for efficiency reasons because similar topics are usually discussed in both the EBSG meeting and the December Balancing Platforms stakeholder workshop.
 - Energy Traders Europe representative responds that, in their view, the Balancing Platforms stakeholder workshop and EBSG have different purposes.
 - ACER representative notes that, for ACER, this could be a good option to combine the two on the same day.

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