

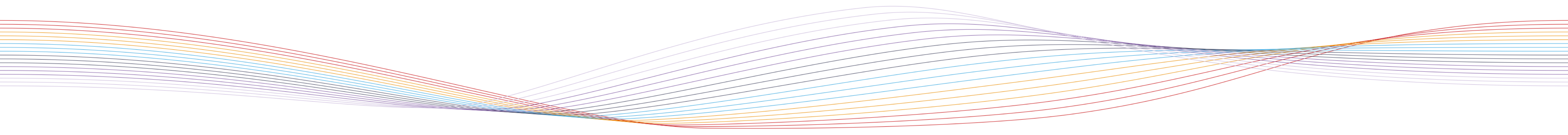
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Imbalance Settlement Harmonisation Methodology Assessment

Energy Traders Europe's summary position

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Bruxelles



Key Points from the ISHM assessment

While there has been implementation progress, the current level of harmonisation is not delivering a genuine European level playing field. There are **OPPORTUNITIES** to improve the **ISHM application** and focus on the **harmonisation progress**.

Report and Study Feedback

- **Limited quantitative evaluation:** few KPI (averaged over TSOs and time) used for assessing different market design characteristics (missing causal relationship acknowledged; still conclusions drawn)
- **Missed opportunity:** no evaluation of ISHM harmonisation and features, e.g. convergence of imbalance prices for uncongested areas or impact of additional components (harmonised trading incentives)
- **Different interpretations of the ISHM** are mentioned, but no details on the correct reading and resulting implementation deviations are given

Process Feedback

- No market participants were involved in scoping and evaluation of the study, or providing feedback from a BRP perspective
- Qualitative statements are based on TSO survey responses, self-assessing their ISHM compliance and need for further harmonisation

Main recommendations

- Deliver **genuine European harmonisation** & Set a clear implementation objective
- **Improve price signals and market incentives**; limit additional charges
- **Retain single imbalance pricing**
- **Strengthen regulatory consistency and transparency**

Contact

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