

Building a NWE market by 2012:

NWE Day-ahead price coupling:

- EURELECTRIC welcomes the **progress made** but points at the **genuine lack of transparency and interest in associating market participants**;
- EURELECTRIC has repeatedly asked the project leaders to present a **comprehensive and robust plan** which warrants **robustness, sense of urgency, extendibility and flexibility**, preferably by end of 2012. EURELECTRIC has not received **any reply** to date;
- This plan now exists in the form of the **APCA agreement** ('All Parties Cooperation Agreement') but despite congestion management is a public function, it was **refused to circulate it to market parties**;
- This level of confusion is further exacerbated by the fact that the **NC CA CM risks re-opening and re-starting the process** from scratch.

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NWE Intra-Day platform:

- In the context of fast growing RES development, an **integrated intra-day platform** is instrumental in allowing market participants to balance their positions thereby reducing the need for balancing services and/or cross-border re-dispatch measures;
- EURELECTRIC sees that a **whole year has been spent working** on a NWE intra-day model which will not deliver before 2014:

EURELECTRIC proposals:

- We request that the **APCA agreement** is **urgently communicated to the market** together with relevant background information/feedback;
- The involved PXs must speed up the **implementation of ID interim model** (select the 1-2 absolutely vital requirements for a prompt go-live of the interim model and improve it over time with additional requirements) + **reporting procedures in AESAG** must be **significantly improved**.
- We support the **EC governance guidelines** which foresee a clear representation of market stakeholders and recommend to implement it without delay. **Consistency of the APCA with the guidelines should also be ensured.**

EURELECTRIC views on the NC CA CM

- According to the Third Energy Package, the Code is meant to set **common and harmonized binding rules** so that TSOs jointly calculate the capacity and deal with congestions **at European level** thereby replacing current less efficient combination of varied national practices.
 - The NC should build on AESAG process, target models and cross-border roadmaps as well as existing market models.
- However, the Draft Code mainly **focusses on processes rather than content** and we see the risk that these rules will be defined at a later stage by System Operators in the absence of any clear decision-making rules and involvement of ACER and market parties.
 - We thus deem it necessary to **institutionalize in the Code** the ENTSOE Stakeholders Group as an Advisory Body;
 - The **Stakeholders Group should be consulted and updated through** regular meetings of ENTSO-E stakeholders' group. ACER should be well informed about the outcome of such meetings and take due actions in case the proposed set of rules is not well justified and does not maximize the socio-economic welfare
- **Leaving the final decision on essential rules of the code on a national level will not deliver a single European solution** – a situation which EURELECTRIC sees most worrying and not consistent with the letter and spirit of the Third Energy Package.