

Response ID ANON-9WUV-XPTS-A

Submitted to All TSOs' proposal for the day-ahead firmness deadline (DAFD)

Submitted on 2016-05-18 22:27:40

Introduction

1 What is your name?

Name:

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2 What is your email address?

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3 What is your organisation?

Organisation:

Interim All NEMO Committee (and answers also supported by Europex)

Questions and general comments

1 Does the DAFD proposal satisfy the needs for harmonization and simplicity?

Does the DAFD proposal satisfy the needs for harmonization and simplicity?:

It is positive that the proposed DAFD is harmonized for all Cross Zonal Borders that will be part of the Single Day Ahead Coupling (SDAC). However, while it is expressed with simplicity it lacks needed precision, or reference to the operational impact of this deadlines. For example, to explain that this does not have an impact on the normal procedures for TSOs to provide Cross Zonal DA (ATC and/or FB) capacities to relevant NEMOs.

2 How does the DAFD proposal affect your internal, market-related processes (if applicable)? Please explain.

How does the DAFD proposal affect your internal, market-related processes (if applicable)? Please explain.:

It affects the orderly and timely operation of the DA MCO Function that we as NEMOs are responsible for, and therefore it is crucial that clarity is given not only about how long before the SDAC GCT (which is set at 12:00 noon CET in CACM GL) the DAFD will be, but also (a) how much earlier CZ capacities normally at the latest shall be provided, and (b) clarity on backup procedures if such submission of CZ capacities is delayed.

We understand that the proposed DAFD corresponds to the current 11:45 deadline in DA Multi Regional Coupling (MRC), which represents the final deadline for TSOs to submit CZ capacities to NEMOs for day-ahead market coupling. With implementation of the DAFD this deadline will move to 11:30. Today in MRC there are backup procedures to manage situations when operational deadlines are missed, and we expect that we will be able to maintain such arrangements under SDAC.

3 Would you suggest any modifications to the proposal? If so, please provide a justification for the changes (please refer to specific articles).

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At least two additions to the DAFD proposal are in our view needed, namely an explanation of the operational impact:

(1) Add an explanation in the recitals about backup procedures if normal delivery of CZ capacities is delayed, thus causes a risk that the DAFD cannot be kept. Under SDAC we expect to be able to maintain backup procedures to handle situations where operational deadlines have been missed.

(2) Add an explanation in the recitals that we do not expect the DAFD proposal to impact normal procedures and timelines for TSOs to submit capacity (and subsequent publication times) in Multi Regional Coupling (MRC), the deadlines defined in Article 46 of CACM GL shall be respected.

4 Are there any relevant provisions missing from the DAFD proposal? If so, please provide a justification for the comment.

Are there any relevant provisions missing from the DAFD proposal? If so, please provide a justification for the changes.:

See answer to question 3, and in addition note that the additions we propose are in-line with since long established and approved practice across the countries part of DA MRC, and such recognition of existing well-functioning practices is recommended in CACM GL.

5 Do you have any other comments on the proposal and/or consultation process?

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The DAFD has clear impact on the timely submission of DA orders by market participants to the NEMO's respective DA markets, and the subsequent operation by operational NEMOs of the DA MCO Function that delivers the SDAC. The All NEMO Committee would have welcomed the opportunity to discuss proposal with TSOs before the consultation was launched. We believe that the further development of operational arrangements and procedures for SDAC should be managed under the joint governance of TSOs and the All NEMO Committee.