

#### Fundamental criteria

- FB should only be introduced after market participants have been given sufficient preparation to allow for a smooth transition. (Whereas (7) of EU 2015/1222)
- Changes should lead to improvement and not inefficiency
- Socio economic welfare is not restricted to the DA-market
  - $\triangleright$  SEW<sub>TOT</sub> = SEW<sub>DA</sub> + SEW<sub>ID</sub> + SEW<sub>FM</sub>
  - > SEW incorporates other costs e.g. reduced transparency and consequences for competition
  - > SEW also comprises costs and benefits outside the electricity market



## Output of External Parallell Run

- EPR shows overuse of hydropower in the northern regions
- Leaving only 1% of SEW<sub>DA SE</sub> and 67% of SEW<sub>DA</sub>
  Nordic
- What are the effects if we consider Norway?





#### Indirect effects outside Day ahead

- How can SEW<sub>TOT</sub> be appreciated without "decision" on ID-capacities?
- In what way are effects on competition incorporated in the calculated SEW?
  - Secrecy of CNECs
  - More complicated model
  - Less transparency! Less competition, uncertain pricing-> higher risk premiums





### Questions to TSOs and NRAs

- Why is SEW<sub>TOT</sub> restricted to DA?
- How does the overproduction of hydro affect the calculated SEW?
- If FB is further delayed what is the plan for
  - mFRR EAM
  - NBM projects dependent on mFRR EAM





# Questions to TSOs and NRAs

- Intra day market
  - 23 November Kinect...
  - Money machine or a breach of the 70% rule?
  - EPR FB ID, will we have six months of ID capacitys?
- Merging with CORE in accordance with CACM art 15 and 20:5
  - Is there a plan and does it include stakeholders?



