



To:
NordREG
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NordREG's public consultation on draft reports to the Electricity Market Group of the Nordic Council of Ministers

Finnish Energy Industries thank for the opportunity to comment NordREG's draft reports. However, due to the rather short consultation period given, comments are very brief and we would like to have the opportunity to comment these projects also at a later phase.

A common Nordic Platform for balancing services

We welcome the progress concerning balancing services. This development is a prerequisite to achieving a common Nordic end-user market. In order to allow market actors to minimize their imbalance, it is important that the development of the intra-day market (EIBas) is continued. Balancing is important when extreme market situations take place, and thus related to peak load arrangements. This relationship merits further study by NordREG.

Regulation of the Nordic TSOs with focus on Market Efficiency and Harmonisation

Nordel and NordREG work on increased transparency on system planning, coordination of common rules on congestion management, size and use of congestion income. This work supports the implementation of the CBT regulation. Common transparent rules e.g. on congestion management enhance trust on the functioning of the market, so pressure for swift progress on this area is well in order.

Monitoring of Regulation Power Market

Regulation power market is also in principle common to Nordic countries. However, it has more national characteristics than rest of the physical market for instance the availability of Elbas market and the differing arrangements to maintain peak load reserves.

The link between the regulation market and other physical markets is important and we find that monitoring of the regulation power market should be connected to surveillance of other physical markets. As a minimum, monitoring rules and processes shall be transparent and the same in the Nordic area. Preferably monitoring should be done by a common body, e.g. Nord Pool market surveillance.

Costs and benefits of a Nordic retail market Integration

The Nordic Council of Ministers had asked for a socio-economic analysis of common retail market with reconsidered timetable.

A cost-benefit analysis is of course challenging, but it would be appreciated if deeper analysis, also involving at least some quantitative parts, would be there in a final report.

The present timetable with the target to year 2010 is assumed to be challenging. If timetable is very strained, costs rise. Stakeholders would be interested to see an analysis on how NordREG sees the next steps and the time they are expected to take.

Finnish Energy Industries

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