

Information Exchange Guidelines for Congestion Management Market

1 Introduction

This information exchange guideline pertains to the joint Congestion Management Market FinFlex. The market follows the terms and conditions approved by the Energy Authority for providers of congestion management flexibility capacity and flexibility energy¹ (hereinafter referred to as Terms and Conditions).

2 Definitions

The Congestion Zone refers to the geographical area defined by the System Operator on the Marketplace, based on which the System Operator allocates the Congestion Management flexibility capacity and flexibility energy it has acquired.

Flexibility Service Provider refers to a Trading Party approved for the Marketplace that has entered into an agreement with the System Operator or the Marketplace to participate in the Marketplace's Congestion Management capacity and energy market. The Flexibility Service Provider can be the owner of a Controllable Unit, a representative authorised by the owner, an Open Supplier or a Balance Responsible Party.

A Service Providing Unit (SPU) refers to an entity with regulating capacity consisting of one or more controllable units at a single distribution network metering point or transmission grid connection point.

A Service Providing Group (SPG) refers to an entity consisting of one or more Service Providing Units that a Flexibility Service Provider offers to the Marketplace. A Service Providing Group can only contain Service Providing Units belonging to the balance portfolio of the same Balance Responsible Party and to the same Congestion Zone.

A Marketplace refers to the Marketplace acquired by the System Operators for the purpose of flexibility trading, to which the Flexibility Service Providers submit Capacity and Energy Offers. The Marketplace is publicly announced on the System Operator's website.

The Rulebook refers to the Marketplace usage guide (NODES rulebook), which can be found on the Marketplace website for registered users.

A Market Period refers to the trading period of the market with the accuracy of which bids are submitted. The length of the Market Period is 60 minutes.

A Baseline refers to the average power level during the Market period, which is sent by the Flexibility Service Provider or determined by the Marketplace. It represents the behavior of the Service Providing Group when no activation has taken place. By comparing the Baseline with the measurement data, the amount of activated flexibility is verified.

¹ [Terms and Conditions for Congestion Management Market](#)

Power change time or Ramp time refers to time taken to change the active power produced or consumed by the Service Providing Group as a result of the activation of the Energy Offer or the time taken to change the power level back to the power level that the Service Providing group would have had without the activation.

Delivery date refers to a day during which the Service Providing Group has one or more accepted trades.

Working day means any day, that is not Saturday, Sunday or public holiday in Finland or Norway.

A *System Operator* refers to the distribution and transmission system operators that apply these terms and conditions, in this document Fingrid Oyj ja Helen Sähköverkko Oy (later in the document *System Operators*).

3 Registration on the Marketplace

A Flexibility Service Provider registers on the Marketplace online² through the provider of the Marketplace³. After the Flexibility Service Provider's registration, the System Operators verify the information and approve the participant for the market.

During registration, the System Operators must be provided with a phone number for urgent contact. The phone number must be sent via email to both System Operators at the email addresses listed in chapter 10. The Flexibility Service Provider must be reachable before the start of the Market periods for which they have submitted binding offers and during those market periods. Changes to contact information must be reported to the System Operators via email (see chapter 10).

The Flexibility Service Provider can add new users to their organization on the Marketplace. This is done in the section *Organization admin > Invite user*.

4 Management of Service Providing Unit Data

The Flexibility Service Provider enters the Service Providing Units (SPU) they use on the Marketplace into the Marketplace system. At least the mandatory fields must be filled in for the resources. The metering point identifier field is filled in with the metering point identifier or transmission grid connection point identifier. Small units can also be entered as aggregated, in which case "Aggregated" is written in the metering point identifier field. After this, the unit is marked as pending approval by the System Operators. No separate activation test is carried out for the Resources.

After approval, the Flexibility Service Provider creates a Service Providing Group (SPG) from one or more of their SPUs, which they use for trading. The System Operator determines the Congestion Zone for the SPUs. If the SPG contains SPUs from multiple Congestion Zones, the offers linked to the SPG are only available at the highest level of the zone hierarchy. If the Flexibility Service Provider's SPGs are not from its own

² <https://portal.nodesmarket.com/onboarding/dashboard>

³ <https://portal.nodesmarket.com/>

balance, the SPGs must be grouped such that only SPUs under a certain electricity retailer-Balance Responsible Party pair are in the same SPG.

According to the Terms and Conditions, chapter 4, the Flexibility Service Provider or the owner of the flexible resource must agree with the Balance Responsible Party and the Open Supplier about using the SPU in Congestion Management Capacity and Energy Markets. Additionally, the Flexibility Service Provider is obliged to notify the System Operators in writing about the existence of the agreement. The notification of the agreed participation of an SPU in the Congestion Management Market must be made by completing the notification form found on the websites^{4, 5} of both System Operators (Notification of agreed participation of a flexible resource in the Congestion Management Market). The notification form must be sent to Helen Electricity Network and/or Fingrid according to the instructions provided in the form. Appendix 1 lists the matters that, according to the System Operators, the Flexibility Service Provider or the resource owner should at least discuss with the Balance Responsible Party and the Open Supplier when agreeing on participation.

The Flexibility Service Provider or the owner of the flexible resource commits to notifying the System Operators about changes to the information provided in the notification form no later than 14 days before the changes take effect, in writing via the email addresses provided in chapter 10.

If the Balance Responsible Party or Open Supplier of the flexible resource changes, the Flexibility Service Provider or the resource owner must agree on participation with the new Balance Responsible Party and Open Supplier and submit a new notification form. The Flexibility Service Provider must also update the changed Balance Responsible Party and electricity retailer information for the SPU on the Marketplace's resource information modification view on the day the change takes effect.

If other details of the SPU need to be updated, the Flexibility Service Provider can change the location, name, resource nominal power, metering point identifier, and power change rate of the SPG on the Marketplace. Changes in contact information must be notified to the System Operators via email (see chapter 10).

The Power change time (also known as "Ramp Time") that needs to be considered for the imbalance settlement of the SPG is a maximum of 120 minutes. It is permissible for the SPU to have a longer Ramp Time, but the imbalance settlement considers a maximum Ramp Time of 120 minutes. When entering the data of the SPG into the Marketplace, it should be noted that the Ramp Time is entered as the power change rate (MW/min). If the SPG consists of many small separate units with very fast Ramp Time, it is recommended to set the ramp time to zero.

5 Trading on the Marketplace

The exchange of information related to trading primarily takes place on the Marketplace according to the Rulebook. Notifications regarding accepted offers and upcoming

⁴ <https://www.fingrid.fi/en/grid/power-transmission/transmission-management/congestion-management-market/>

⁵ https://www.helensahkoverkko.fi/ajankohtaista/jouston_paikallismarkkina/jouston-paikallismarkkina

activations can be subscribed to from the section *Organization Admin > Manage Notifications*. The same information is also available via the API.

If the Flexibility Service Provider is unable to maintain the capacity according to the accepted Capacity offer or deliver the energy according to the accepted Energy offer, the Flexibility Service Provider must notify immediately. The notification must be sent by email (see chapter 10) to the System Operator who is the counter party for the trade in question.

The Flexibility Service Provider should note that if a SPG is activated in the Congestion Management Market, and the Balance Responsible Party submits a production plan to Fingrid, the Balance Responsible Party must update the production plan according to the applicable Balance Management terms⁶ to consider the accepted offer.

6 Measurement data and Baseline reporting

The SPG is required to provide a Baseline for the Congestion Management Market, which is an estimate of the group's consumption or production. The Baseline can be calculated by the Marketplace from the measurement data submitted, or the Flexibility Service Provider may provide the Baseline. The Flexibility Service Provider reports the measurement data and any Baselines of their SPGs to the Marketplace by uploading the data through the user interface or via the API.

If the Flexibility Service Provider wishes to use or change their own defined Baseline calculation method, they must get the calculation method approved by the System Operator to whose zone the SPG belongs. The Baseline calculation method must be described in writing and sent to the System Operator via email (see chapter 10). The System Operator may ask for clarifications regarding the submitted Baseline calculation method before its approval. More detailed requirements for submitting the Baseline are specified in the Rulebook (NODES Rulebook Schedule 5, section 3.1).

For the measurement data and Baseline reporting to the Marketplace, the following notation rules apply:

- Positive values: energy supplied to the grid
- Negative values: energy withdrawn from the grid

Delivery of measurement data for the SPG when using the Baseline calculated by the Marketplace:

- Measurement data must be delivered for the Delivery Day and the previous seven days no later than the day following the Delivery Day.

Delivery of measurement data and Baseline for the SPG when using its own Baseline:

- Measurement data for the Delivery Day must be delivered no later than the first Working Day of the following month.

⁶ <https://www.fingrid.fi/en/electricity-market/balance-service/>

- Baseline values must be delivered for all market time periods on the Delivery Day before submitting the offer. The Baseline can be updated until the beginning of each Market Period.

Detailed requirements for submitting measurement data are specified in the Marketplace guidelines (NODES Rulebook Schedule 5, section 3.4).

When delivering measurement data, the Flexibility Service Provider must consider that during the activation periods of accepted offers in the Congestion Management Market, the effect of reserve activations must be corrected in the measurement data. For example, if the Flexibility Service Provider has offered part of the capacity of the flexible resource to the reserve market and part to the Congestion Management Market, the effect of potential reserve activations must be corrected in the delivered measurement data.

If the Flexibility Service Provider notices errors in the measurement or Baseline data delivered from their SPG, they must immediately contact the System Operator, who is the counterparty in the trade. The System Operator will handle the situation on a case-by-case basis, considering the provisions of force majeure.

7 Imbalance settlement

The energy trades concluded in the Congestion Management Market after the Day-ahead market, are reported by Fingrid as bilateral trades to eSett. When creating the first SPU related to the Balance Responsible Party - Retailer pair, Fingrid creates the trade reporting parties in eSett. After this, the Balance Responsible party being the counterparty must accept the created structure in eSett Online Service. Fingrid uses the balance responsible "FGV Fingrid siirtojenhallinta" and the description field reads "Siirtojenhallinnan markkina".

Unlike the bilateral trades usually reported, energy trades in the Congestion Management Market are reported retrospectively, and the counterparty responsible for the balance does not need to report the energies related to the energy trades to the imbalance settlement.

Trades made before the Day-Ahead Market are not reported to the balance settlement. In this case, the Flexibility Service Provider must notify their Balance Responsible Party and Open Supplier of the trades according to the Terms and Conditions, chapter 8 (Reporting by the Flexibility Service Provider).

Regarding the trades in the Congestion Management Market reported to the imbalance settlement, it should be noted that in addition to the energy of the accepted offer, the ramps related to the Power Change are reported to the imbalance settlement if a Ramp Times are indicated in the information of the SPG.

8 Invoicing

Invoicing is carried out once a month. The Marketplace calculates and sends the invoice within seventeen (17) Working days from the end of the invoicing month, assuming that

all necessary information has been provided to the Marketplace on time. The payment term for the invoice is forty-five (45) calendar days.

Each trading party is obligated to maintain up-to-date payment information with the Marketplace. The information can be submitted through the Marketplace section: *Organization Admin > Manage Invoices*.

9 Changes in delivery capability

The Flexibility Service Provider is obligated to notify the System Operator in accordance with the Terms and Conditions of the Congestion Management Market if they replace the missing approved flexibility capacity from other SPG in the respective Flexibility Procurement Area. The notification is made via email to the email addresses specified in chapter 10.

The Flexibility Service Provider must also promptly inform the System Operator in writing via email to the addresses specified in chapter 10 about the occurrence of force majeure, its estimated duration, and its cessation.

10 System Operator contact information

In communications with the System Operators, it should be clearly stated which SPU or SPG the message concerns and who the contact person is for the inquiry.

The contact details for System Operators regarding questions and notifications related to the Congestion Management Market are:

Fingrid Oyj

finflex@fingrid.fi

Helen Sähköverkko Oy

finflex@helen.fi

APPENDIX 1: Agreement between the Flexibility Service Provider or resource owner and the Balance Responsible Party and Open Supplier - points to consider

According to section 4 of the Terms and Conditions for Congestion Management Flexibility Capacity and Flexibility Energy (Terms and Conditions), the Flexibility Service Provider or Resource Owner must agree with the resource's Balance Responsible Party and the Open Supplier (electricity retailer) on the use of the resource in the Congestion Management Capacity and Energy Markets. According to the Congestion Management Market information exchange guidelines, the existence of the agreement must be notified in writing to the System Operators using the notification form "*Notification of agreed participation of a flexible resource in the Congestion Management Market.*"

The content of the agreement is a contractual matter between the parties, and the System Operators do not comment on the content of bilateral agreements. It is sufficient for the System Operators to receive the information on the notification form that an agreement exists between the Flexibility Service Provider or Resource Owner, the Balance Responsible Party, and the Open Supplier regarding the use of the resource in the Congestion Management Market.

The System Operators suggest that the Flexibility Service Provider or resource owner, the Balance Responsible Party, and the electricity retailer should discuss at least the following points when agreeing to participate:

- The Flexibility Service Provider's notice to the Balance Responsible Party and the electricity retailer of the amount of flexibility energy accepted in the Congestion Management Energy Market and the method of notification (see the requirement set in section 8 of the Terms and Conditions for the Flexibility Service Provider).

Background information:

- In the Congestion Management Market auction (D-1 at 10.00 EET/EEST), the accepted bid is not reported by the System Operator for imbalance settlement. This means that the Balance Responsible Party/electricity supplier of the Service Providing Group (SPG) must take into account the accepted bid in the auction in their trading to avoid balance deviations due to the Flexibility Service Provider's accepted bid in the Congestion Management Market auction and its corresponding flexibility delivery.
- Fingrid reports the energy and ramp energy of transactions made in the continuous energy trading of the Congestion Management Market after the Day-Ahead Market (D-1 from 15:00 onwards) to the imbalance settlement (eSett). Energy reporting is done between Fingrid and the Balance Responsible Party-electricity supplier pair for each balance settlement period within 13 days from the accepted energy offer. The reporting of transactions in the Congestion Management Market to eSett is not done on a Flexibility Service Provider basis. The amount of ramp energy to be reported in the imbalance settlement is calculated based on the power change information provided by the SPG. The Flexibility Service Provider must agree on the use

of Ramp Times of the SPG with the Balance Responsible Party and the electricity supplier (see section 4 of this document).

- If the subject of the contractual flexibility delivery is a Service Providing Unit (SPU) or s Service Providing Group (SPG) whose Balance Responsible Party is obliged to provide Fingrid with the resource's production plans according to the terms of balance management, the production plan for the SPU or SPG must be updated to take into account the impact of the accepted bid in the Congestion Management Market (see section 5 of this document).
- Balance Responsibility in Contractual Flexibility Delivery in the Congestion Management Market
 - In contractual flexibility delivery, the Balance Responsible Party of the flexible resource is responsible for any balance deviations potentially caused by the actions of the Flexibility Service Provider.
 - In the Congestion Management Market auction (D-1 at 10.00 EET/EEST), the accepted bid is not reported by the System Operator for imbalance settlement.
 - Regarding energy trades in the Congestion Management Market after the Day-Ahead Market (D-1 from 15:00 onwards):
 - The correction of the balance in the imbalance settlement by the Balance Responsible Party is based on the accepted bid, that is, the activation energy ordered from the Flexibility Service Provider and the ramp information reported by the Flexibility Service Provider, not the adjustment energies delivered by the Flexibility Service Provider.
 - The Flexibility Service Provider should always strive to deliver exactly the amount of activation energy according to the accepted bid and possibly reported ramp information. However, if the Flexibility Service Provider delivers a different amount of flexibility energy than the accepted bid and reported Ramp Times, this will result in a balance deviation for the Balance Responsible Party.
- Financial compensation between the Flexibility Service Provider / owner of the flexible resource and the electricity supplier / Balance Responsible Party regarding energy trades in the Congestion Management Market made after the Day-Ahead Market (D-1 from 15:00 onwards)

Background Information:

- The electricity supplier is responsible for procuring electricity for the flexible resource in the electricity market.
- In contractual flexibility delivery, any compensations and related information exchanges are to be agreed bilaterally by the parties involved.
- This is not independent aggregation but contractual flexibility delivery. Independent aggregator participation in the Congestion Management Market

is currently not possible, and independent aggregation compensation models⁷ are not applied by network companies for contractual flexibility delivery.

⁷ The compensation model for independent aggregation (compensation calculation method) refers to the cost incurred by the electricity supplier or the increased sales revenue due to the flexibility provided by the independent aggregator. This results in financial compensation between the independent aggregator and the Balance Responsible Party of the electricity supplier at a defined reference price. In the independent aggregation compensation model, the direction of the compensation payment is determined as follows: in upward regulation, the independent aggregator compensates the Balance Responsible Party of the electricity supplier, and in downward regulation, the Balance Responsible Party of the electricity supplier compensates the independent aggregator. In the independent aggregation model, the compensation for the electricity supplier is implemented through its Balance Responsible Party.