



Stakeholder consultation document
and Impact Assessment for the
Capacity Calculation Methodology
Proposal for the Nordic CCR



Table of content:

1	Introduction and executive summary	5
1.1	Proposal for the Capacity Calculation Methodology.....	5
1.2	Content of this document and guideline for the reader	6
1.3	Capacity calculation process	9
2	Legal requirements and their interpretation	10
3	Introduction to Flow Based methodology.....	22
3.1	Motivation behind introducing FB in the Nordics	22
3.2	Description of FB	26
4	ACER recommendation on Capacity Calculation.....	32
4.1	General influence of the ACER recommendation on the proposed CCM	32
4.2	The influence of the first ACER recommendation on the proposed CCM	33
4.3	The influence of the second ACER recommendation on the proposed CCM	36
5	Definition of “undue discrimination”	39
6	DA Capacity calculation methodology.....	41
6.1	Detailed description of the FB capacity calculation approach	41
6.2	Selection of relevant grid constraints for the market domain	52
7	ID Capacity calculation methodology.....	54
7.1	Description of the FB capacity calculation approach	54
7.2	Detailed description of the CNTC capacity calculation approach	55
7.3	Frequency of the ID capacity calculation	59
8	Input parameters to the capacity calculation	60
8.1	Reliability Margin (RM).....	60
8.2	Operational security limits, contingencies, and allocation constraints	66
8.3	Generation Shift Key (GSK).....	70
8.4	Remedial Actions.....	74
9	Methodology for the validation of cross-zonal capacity.....	76
9.1	Methodology for the validation of cross-zonal capacity according to Article 26	76
10	Fallback.....	78



11	Impact assessment	79
11.1	Quantitative impact assessment	79
11.2	Qualitative impact assessment	101
11.3	Cost of implementation and operation	123
11.4	Impact assessment in accordance with CACM article 3	125
12	Timescale for the CCM implementation	127
12.1	Timeline for implementation of the CCM	127
13	ANNEX I: Results from the public consultation	131
13.1	Name of stakeholders	132
13.2	Individual responses to the questions raised in the consultation and TSO answer.....	132
13.3	Question 4	132
13.4	Question 5	137
13.5	Question 6	142
13.6	Question 7	144
13.7	Question 8	148
13.8	Question 9	150
13.9	Question 10	152
13.10	Question 11	153
13.11	Question 12	159
13.12	Question 13	164
14	ANNEX II: Example calculation of nodal PTDFs	169
15	ANNEX III: Model set-up for the Case study NO3-NO5	171
16	ANNEX IV: Detailed mathematical descriptions of power flow equations	174
17	ANNEX IV: Results from the public consultation on the legal document	177
17.1	Name of stakeholders	178
17.2	Individual responses to the question raised in the consultation and TSO answer	178
17.3	Individual comments to the articles in the legal document and TSO answer.....	190



Abbreviations:

AC	Alternating Current
ATC	Available Transfer Capacity
CACM	Capacity Allocation and Congestion Management
CCC	Coordinated Capacity Calculator
CCM	Capacity Calculation Methodology
CCR	Capacity Calculation Region
CGM	Common Grid Model
CNE	Critical Network Element
CNTC	Coordinated Net Transfer Capacity
CO	Critical Outage
DA	Day Ahead
DC	Direct Current
FAV	Final Adjustment Value
FB	Flow-Based
FCA	Forward Capacity Allocation
Fmax	Max Capacity on a CNE
Fref	Flow on a CNE in the base case
Fref'	Flow on a CNE at zero net position
FRM	Flow Reliability Margin
GSK	Generation Shift Key
ID	Intraday
IGM	Individual Grid Model
MCO	Market Coupling Operator
CACM Regulation	Commission regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management Guideline
FCA Regulation	Commission regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline on forward capacity allocation
N-CGM	Nordic Common Grid Model
NEMO	Nominated Electricity Market Operator
NP	Net position
NTC	Net Transfer Capacity
PSIA	Power System Impact Analysis
PTDF	Power Transfer Distribution Factor
PTR	Physical Transmission Right
PX	Power Exchange
RA	Remedial Action
RAM	Remaining Available Margin



RSC
TSO

Regional Security Coordinator
Transmission System Operator



1 Introduction and executive summary

This document is the consultation document provided to the Stakeholders for the Nordic Capacity Calculation Methodology (CCM) proposal. The consultation document describes the proposal for the CCM for day ahead and intraday capacity calculation for the Nordic Capacity Calculation Region (CCR), and provides an impact assessment of the proposed methodology. The intention of this document is to give the Stakeholders the opportunity to comment on the proposed methodologies.

The CCM proposal for the Nordic CCR is required by Article 20 (2) of the Commission Regulation (EU) 2015/1222 establishing a guideline on capacity allocation and congestion management (CACM Regulation).

1.1 Proposal for the Capacity Calculation Methodology

With regard to the CACM Regulation Article 20.2, the Nordic TSOs are proposing to introduce new Capacity Calculation Methodologies for the day ahead, and intraday market. In accordance to CACM Regulation Article 20.1, the capacity calculation approach for the day ahead and intraday market timeframe shall be a flow-based approach unless the requirements in CACM Regulation Article 20.7 are met.

The CACM Regulation article 20.7 states that the TSOs may jointly apply for a coordinated net transmission capacity approach if the TSOs concerned are able to demonstrate that the application of the capacity calculation methodology using the flow based approach would not yet be more efficient compared to the coordinated net transmission capacity approach and assuming the same level of operational security in the concerned region.

1.1.1 Proposed approaches for the day ahead and intraday timeframes

For the Day Ahead timeframe: The Nordic TSOs propose to implement a Flow Based capacity calculation approach for the day ahead Market timeframe.

For the Intraday timeframe: As the long-term solution, the Nordic TSOs proposes to implement a Flow Based approach for the intraday timeframe as soon as the intraday market platform is technically able to utilize flow-based capacities.

As an interim solution, the Nordic TSOs propose to implement a coordinated net transmission capacity approach for the intraday market timeframe.

The current Nordic TSO proposal is based on quantitative and qualitative assessments, which has provided no evidence to support a hypothesis of the coordinated net transmission capacity approach



being as efficient as the flow based approach. The assessment has been based on a comparison between Flow Based and the current net transmission capacity approach, where the current approach serves as a proxy for a coordinated net transmission capacity approach. Thus, all grid limitations introduced in the flow based simulations are the operational limitations used in daily operation. A prerequisite for implementing a flow based day ahead approach in the Nordics, is that the European day ahead market platform is technically able to manage flow based capacities.

The long term solution for the intraday market is proposed to be a flow based approach. This might however not be implemented until the intraday market platform are technically able to utilize flow based market capacities. As an interim solution, the Nordic TSOs proposes to implement a coordinated net transmission approach in the intraday market until the flow based approach becomes technically feasible.

The Nordic TSOs acknowledge that further work is needed to implement all CACM-required features in the capacity calculation; to apply proper Common Grid Model (CGM) in calculations, to make the CCM robust and reliable before go-live, and to confirm that the implemented CCM approach can deliver results in line with the preliminary quantitative assessments, showing benefits of the CCM approach. During this process, the transparency towards stakeholder will be ensured.

1.2 Content of this document and guideline for the reader

This consultation document consists of four parts in addition to this introductory chapter.

Firstly, chapter 2 provides an interpretation of the relevant articles in CACM. Only the content and the wording of CACM articles where some interpretation seems needed, has been interpreted.

Secondly, chapter 3 gives a high-level introduction to the FB and CNTC capacity calculation approach. This is not required by CACM, but it allows the reader to learn about the different CCMs relevant for the proposal.

Thirdly, the actual Capacity Calculation Methodology proposal is presented in Chapters 4 to 10. These chapters are the response to the CACM Regulation article 12.2:

"TSOs and NEMOs responsible for submitting proposals for terms and conditions or methodologies or their amendments in accordance with this Regulation shall consult stakeholders, including the relevant authorities of each Member State, on the draft proposals for terms and conditions or methodologies where explicitly set out in this Regulation. The consultation shall last for a period of not less than one month."

Chapter 4 addresses the ACER recommendation on Capacity Calculation, whereas Chapter 5 touches upon 'undue discrimination'.



Chapters 6 to 8 are organized in order to facilitate the reader to check with the requirements in CACM. Thus, in the first level chapters, a distinction has been made between day ahead, intraday, and input parameters to the calculation process. In the second level subchapters, a distinction is made between flow based and CNTC, and in chapter 8, between different input to the capacity calculation. In the third level subchapters, we refer to each individual paragraph of CACM. Figure 1-1 below is an illustration of the organization of these chapters.

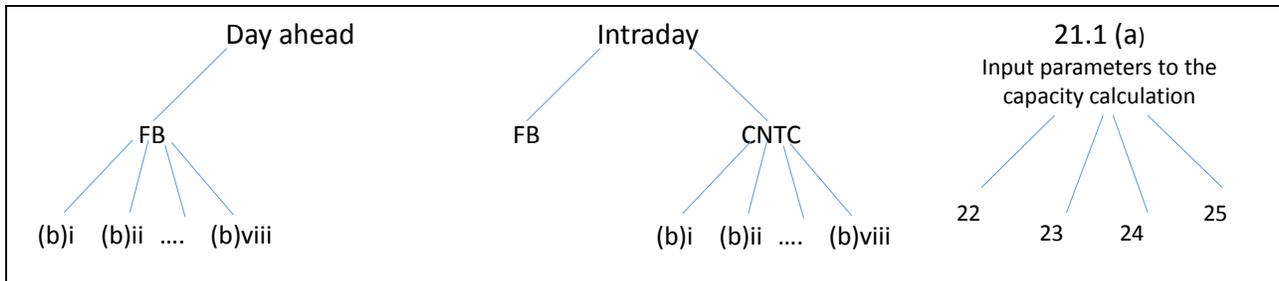


Figure 1-1 Organisation of the chapters 6 to 8

Chapter 9 and 10 are a response to the CACM articles 21.3 and 26.

Fourthly, in chapter 11 the impact of implementing FB in the day ahead market is assessed. The chapter consists of a quantitative part and a qualitative part. The quantitative part is presenting the impact on social welfare and prices/volumes, based on market simulation for a number of weeks in 2016. In the qualitative part, the impact of FB on selected issues is presented. These issues have been selected, based on feedback from stakeholders and what the Nordic TSOs find relevant.



The legal context of this stakeholder consultation document is captured in Box 1.

Box 1: Legal context of the stakeholder consultation document

Name of the Network Code/Guideline: Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management (“CACM Regulation”)

Region and involved TSOs within the region: Nordic Capacity Calculation Region (Nordic CCR) as defined in Article 3 of Decision of the Agency for the cooperation of energy regulators No 06/2016 of 17 November 2016 on the electricity transmission system operators’ proposal for the determination of capacity calculation regions, Annex 1 Definition of the Capacity Calculation Regions (CCRs) in accordance with Article 15(1) of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a Guideline on Capacity Allocation and Congestion Management (CACM Regulation)

Neighbouring regions: Hansa and Baltic Capacity Calculation Regions as defined in Article 4 and 11 of Decision of the Agency for the cooperation of energy regulators No 06/2016 of 17 November 2016 on the electricity transmission system operators’ proposal for the determination of capacity calculation regions, Annex 1 Definition of the Capacity Calculation Regions (CCRs) in accordance with Article 15(1) of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a Guideline on Capacity Allocation and Congestion Management (CACM Regulation)

Articles referred from CACM Regulation: Articles 2, 3, 9(9), 14, 20, 21, 22, 23, 24, 25 and 26, and preambles 4, 6 and 7

Approval process: The proposal for common capacity calculation methodology in accordance with Article 20(2) of CACM Regulation drafted based on this supporting document shall be subject to approval by all regulatory authorities (NRAs) of the Nordic CCR in accordance with Article 9(7) of CACM Regulation. NRAs shall take decisions concerning the submitted capacity calculation methodology in accordance with Article 9(7), within six months following the receipt of the methodology by the last NRA concerned. In accordance with Article 9(12) of CACM Regulation, in the event that NRAs request an amendment to approve the methodology submitted in accordance with Article 9(7), the relevant TSOs shall submit a proposal for amended methodology for approval within two months following the requirement from the NRAs. The competent NRAs shall decide on the amended methodology within two months following the submission. Where the competent NRAs have not been able to reach an agreement on methodology pursuant to Article 9(7) within the two-month deadline or deadline referred to in Article 9(10), or upon their joint request, the Agency shall adopt a decision concerning the methodology or its amendment within six months, in accordance with Article 8(1) of Regulation (EC) No 713/2009. For Norway a parallel decision will have to be adopted by the EFTA Surveillance Authority according to adaptations when incorporating the Third Energy package into the EEA Agreement.

Amendment process: In accordance with Article 9(13), TSOs of Nordic CCR or NRAs responsible for their adoption in accordance with Article 9(7), may request amendments of the capacity calculation methodology. The proposal for amendment to adopted capacity calculation methodology shall be submitted to consultation in accordance with the procedure set out in Article 12 of CACM Regulation and approved in accordance with the procedure set out in Article 9 of CAC Regulation.

Responsibilities: All TSOs of Nordic CCR are responsible for developing a draft proposal for the capacity calculation methodology, submit the draft proposal for consultation, revise the draft proposal taking into account responses from the consultation, submit the proposal for NRAs’ approval and, if requested, amend the proposal requested by the NRAs. All NRAs of Nordic CCR are responsible to approve the methodology and, if requested, to ask amendments to the proposed capacity calculation methodology.



1.3 Capacity calculation process

The day-ahead and intraday electricity markets facilitate efficient matching of consumers and producers of electrical power. The sites of production and consumption of electric power are often located far apart, and the transfer of power between the two makes use of the electric transmission grid. Thus, the relevant physical limitations in the electricity grid must be calculated, simplified and communicated to the electricity market in order to maintain operational security. This is known as the capacity calculation process. The capacity calculation process has to be distinguished from the capacity allocation process, which takes place for e.g. day ahead at the power exchanges. The result of the capacity calculation process is to be used as an input to the capacity allocation process. This document is a detailed proposal covering the capacity calculation process. How this process relates to the adjacent processes before ending up with an actual allocation of capacity, is described in this section.

The capacity calculation process will be coordinated among TSOs. This means that individual grid models prepared by each TSO will be merged into a single European grid model. This Common Grid Model (CGM) will include relevant parts of European grids with forecasted production and consumption patterns for each market time unit. For the day-ahead timeframe this currently implies 24 scenarios, where the capacities will be defined. Capacities will be calculated at the CCR level by applying the CGM. Each TSO will validate the results of the capacity calculation before the capacities are sent to the day-ahead and intraday market platforms. Figure 1-2 shows this coordinated capacity calculation process.

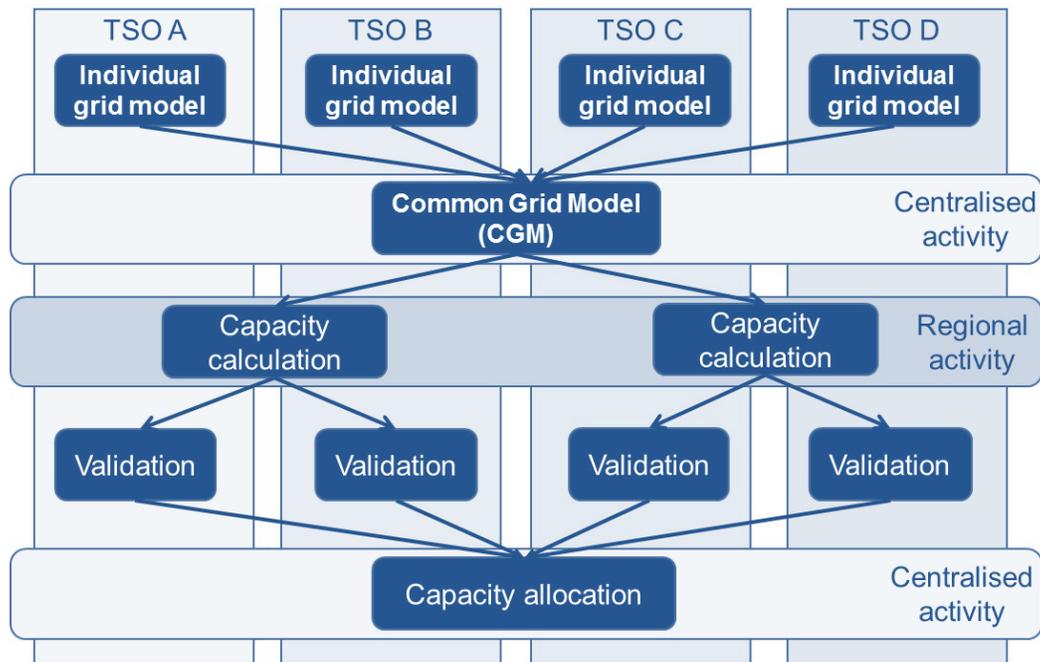


Figure 1-2 Coordinated capacity calculation process

Figure 1-2 illustrates whether the respective actions are performed on a TSO, a CCR region, or a European level. The actions requiring the most coordination and harmonization are the building of the CGM followed by the actual capacity calculation and the allocation. Capacity calculation shall be done on a CCR level.

Individual grid models are built on a TSO level using grid information, and input from market participants. Furthermore, the validation of capacity calculation results is performed at the TSO level, as the TSOs are the responsible parties for network security and can best assess the quality and correctness of the capacity calculation results and they are liable for the power system operation.

2 Legal requirements and their interpretation

This chapter contains a description of the relevant legal references in the Guideline on Capacity Calculation and Congestion Management (CACM Regulation) including some interpretative guidance.

The legal framework also needs to be interpreted in order to formulate a legally sound proposal on the CCM, to define the scope of this proposal, and to make the proposal implementable.



A number of relevant passages of **the preamble of the CACM Regulation** are cited, that should be taken into account to properly interpret the articles stated further below:

“(4) To implement single day-ahead and intraday coupling, the available cross-border capacity needs to be calculated in a coordinated manner by the Transmission System Operators (hereinafter ‘TSOs’). For this purpose, they should establish a common grid model including estimates on generation, load and network status for each hour. The available capacity should normally be calculated according to the so-called flow-based calculation method, a method that takes into account that electricity can flow via different paths and optimises the available capacity in highly interdependent grids. The available cross-border capacity should be one of the key inputs into the further calculation process, in which all Union bids and offers, collected by power exchanges, are matched, taking into account available cross-border capacity in an economically optimal manner. Single day-ahead and intraday coupling ensures that power usually flows from low-price to high-price areas.

(6) Capacity calculation for the day-ahead and intraday market time-frames should be coordinated at least at regional level to ensure that capacity calculation is reliable and that optimal capacity is made available to the market. Common regional capacity calculation methodologies should be established to define inputs, calculation approach and validation requirements. Information on available capacity should be updated in a timely manner based on latest information through an efficient capacity calculation process.

(7) There are two permissible approaches when calculating cross-zonal capacity: flow-based or based on coordinated net transmission capacity. The flow-based approach should be used as a primary approach for day-ahead and intraday capacity calculation where cross-zonal capacity between bidding zones is highly interdependent. The flow-based approach should only be introduced after market participants have been consulted and given sufficient preparation time to allow for a smooth transition. The coordinated net transmission capacity approach should only be applied in regions where cross-zonal capacity is less interdependent and it can be shown that the flow-based approach would not bring added value.”

The most important definitions for the CCM, extracted from **Article 2 of the CACM Regulation**, are as follows:

“6. ‘allocation constraints’ means the constraints to be respected during capacity allocation to maintain the transmission system within operational security limits and have not been translated into cross-zonal capacity or that are needed to increase the efficiency of capacity allocation;

7. ‘operational security limits’ means the acceptable operating boundaries for secure grid operation such as thermal limits, voltage limits, short-circuit current limits, frequency and dynamic stability limits;



8. *'coordinated net transmission capacity approach' means the capacity calculation method based on the principle of assessing and defining ex ante a maximum energy exchange between adjacent bidding zones;*
9. *'flow-based approach' means a capacity calculation method in which energy exchanges between bidding zones are limited by power transfer distribution factors and available margins on critical network elements;*
10. *'contingency' means the identified and possible or already occurred fault of an element, including not only the transmission system elements, but also significant grid users and distribution network elements if relevant for the transmission system operational security;*
11. *'coordinated capacity calculator' means the entity or entities with the task of calculating transmission capacity, at regional level or above;*
12. *'generation shift key' means a method of translating a net position change of a given bidding zone into estimated specific injection increases or decreases in the common grid model;*
13. *'remedial action' means any measure applied by a TSO or several TSOs, manually or automatically, in order to maintain operational security;*
14. *'reliability margin' means the reduction of cross-zonal capacity to cover the uncertainties within capacity calculation;"*

Furthermore, each proposal shall meet the general objectives of the CACM Regulation as outlined in **Article 3:**

"This Regulation aims at:

- (a) promoting effective competition in the generation, trading and supply of electricity;*
- (b) ensuring optimal use of the transmission infrastructure;*
- (c) ensuring operational security;*
- (d) optimising the calculation and allocation of cross-zonal capacity;*
- (e) ensuring fair and non-discriminatory treatment of TSOs, NEMOs, the Agency, regulatory authorities and market participants;*
- (f) ensuring and enhancing the transparency and reliability of information;*
- (g) contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union;*
- (h) respecting the need for a fair and orderly market and fair and orderly price formation;*
- (i) creating a level playing field for NEMOs;*
- (j) providing non-discriminatory access to cross-zonal capacity."*



As a general point, all methodologies and proposals developed under the CACM Regulation should align with the objectives of the CACM Regulation as set out in Article 3. More specifically, **Article 9(9) of the CACM Regulation** requires that:

“The proposal for terms and conditions or methodologies shall include a proposed timescale for their implementation and a description of their expected impact on the objectives of this Regulation.”

Article 14 of the CACM Regulation sets requirements for market timeframes to be followed in drafting the CCM:

“1. All TSOs shall calculate cross-zonal capacity for at least the following time-frames:

(a) day-ahead, for the day-ahead market;

(b) intraday, for the intraday market.

2. For the day-ahead market time-frame, individual values for cross-zonal capacity for each day-ahead market time unit shall be calculated. For the intraday market time-frame, individual values for cross-zonal capacity for each remaining intraday market time unit shall be calculated.

3. For the day-ahead market time-frame, the capacity calculation shall be based on the latest available information. The information update for the day-ahead market time-frame shall not start before 15:00 market time two days before the day of delivery.

4. All TSOs in each capacity calculation region shall ensure that cross-zonal capacity is recalculated within the intraday market time-frame based on the latest available information. The frequency of this recalculation shall take into consideration efficiency and operational security.”

Article 20 of the CACM Regulation sets deadlines for the CCM proposal and defines several specific requirements that the CCM Proposal for CCR Nordic should take into account:

“1. For the day-ahead market time-frame and intraday market time-frame the approach used in the common capacity calculation methodologies shall be a flow-based approach, except where the requirement under paragraph 7 is met.

2. No later than 10 months after the approval of the proposal for a capacity calculation region in accordance with Article 15(1), all TSOs in each capacity calculation region shall submit a proposal for a common coordinated capacity calculation methodology within the respective region. The proposal shall be subject to consultation in accordance with Article 12. [...]

7. TSOs may jointly request the competent regulatory authorities to apply the coordinated net transmission capacity approach in regions and bidding zone borders other than those referred to in paragraphs 2 to 4, if the TSOs concerned are able to demonstrate that the application of the capacity calculation methodology using the flow-based approach would not yet be more efficient



compared to the coordinated net transmission capacity approach and assuming the same level of operational security in the concerned region.

8. To enable market participants to adapt to any change in the capacity calculation approach, the TSOs concerned shall test the new approach alongside the existing approach and involve market participants for at least six months before implementing a proposal for changing their capacity calculation approach.

9. The TSOs of each capacity calculation region applying the flow-based approach shall establish and make available a tool which enables market participants to evaluate the interaction between cross-zonal capacities and cross-zonal exchanges between bidding zones.”

The FB approach shall be the approach used in the common capacity calculation methodology for the day-ahead and intraday timeframes, in regions specified in Article 20(2), Article 20(3) and Article 20(4) of the CACM regulation. For the Nordic CCR, the CACM regulation (Article 20(1)) gives the possibility, instead of the FB approach, to apply the CNTC approach if the Nordic TSOs are able to demonstrate that the application of the capacity calculation methodology using the FB approach would not yet be more efficient compared to the CNTC approach and given the same level of operational security in the Nordic CCR. Here the efficiency should be defined in the context of the capacity allocation and operational security. Thus for the day-ahead timeframe, a more efficient approach is the one, which maximizes the social welfare, i.e. the total market value of the day-ahead implicit auctions, and/or increases operational security. Social welfare is computed as the sum of the consumer surplus, the producer surplus, and the congestion income.

Article 21 of the CACM Regulation defines the minimum content for the CCM Proposal, including methodologies for the calculation of the inputs to the capacity calculation, a detailed description of the capacity calculation approach, and a methodology for cross-zonal capacity. Besides this, Article 21 requests to define the frequency to reassess capacity for the intraday capacity calculation timeframe, a fallback procedure, and a future harmonization of inputs and methodology across CCRs:

“1. The proposal for a common capacity calculation methodology for a capacity calculation region determined in accordance with Article 20(2) shall include at least the following items for each capacity calculation time-frame:

(a) methodologies for the calculation of the inputs to capacity calculation, which shall include the following parameters:

(i) a methodology for determining the reliability margin in accordance with Article 22;

(ii) the methodologies for determining operational security limits, contingencies relevant to capacity calculation and allocation constraints that may be applied in accordance with Article 23;



(iii) the methodology for determining the generation shift keys in accordance with Article 24;

(iv) the methodology for determining remedial actions to be considered in capacity calculation in accordance with Article 25.

(b) a detailed description of the capacity calculation approach which shall include the following:

(i) a mathematical description of the applied capacity calculation approach with different capacity calculation inputs;

(ii) rules for avoiding undue discrimination between internal and cross-zonal exchanges to ensure compliance with point 1.7 of Annex I to Regulation (EC) No 714/2009;

(iii) rules for taking into account, where appropriate, previously allocated cross-zonal capacity;

(iv) rules on the adjustment of power flows on critical network elements or of cross-zonal capacity due to remedial actions in accordance with Article 25;

(v) for the flow-based approach, a mathematical description of the calculation of power transfer distribution factors and of the calculation of available margins on critical network elements;

(vi) for the coordinated net transmission capacity approach, the rules for calculating cross-zonal capacity, including the rules for efficiently sharing the power flow capabilities of critical network elements among different bidding zone borders;

(vii) where the power flows on critical network elements are influenced by cross-zonal power exchanges in different capacity calculation regions, the rules for sharing the power flow capabilities of critical network elements among different capacity calculation regions in order to accommodate these flows.

(c) a methodology for the validation of cross-zonal capacity in accordance with Article 26.

2. For the intraday capacity calculation time-frame, the capacity calculation methodology shall also state the frequency at which capacity will be reassessed in accordance with Article 14(4), giving reasons for the chosen frequency.

3. The capacity calculation methodology shall include a fallback procedure for the case where the initial capacity calculation does not lead to any results.

4. All TSOs in each capacity calculation region shall, as far as possible, use harmonised capacity calculation inputs. By 31 December 2020, all regions shall use a harmonised capacity calculation methodology which shall in particular provide for a harmonised capacity calculation methodology for the flow-based and for the coordinated net transmission capacity approach. The harmonisation of capacity calculation methodology shall be subject to an efficiency assessment



concerning the harmonisation of the flow-based methodologies and the coordinated net transmission capacity methodologies that provide for the same level of operational security. All TSOs shall submit the assessment with a proposal for the transition towards a harmonised capacity calculation methodology to all regulatory authorities within 12 months after at least two capacity calculation regions have implemented common capacity calculation methodology in accordance with Article 20(5).”

According to Article 21 of the CACM Regulation, the proposal shall define methodologies for the calculation of the inputs to the capacity calculation, a detailed description of the capacity calculation approach, and a methodology for the validation of cross-zonal capacity. Cross-zonal is understood to refer to cross bidding zone borders, regardless of whether these borders are within a Member State or between Member States.

The requirement under Article 21(1) (b) (ii), to set rules to avoid undue discrimination between internal and cross-zonal exchanges, implies that unless for reasons of either operational security or economic efficiency, neither internal nor cross-zonal exchanges can be given priority access to transmission capacity within bidding zones. However, due to the zonal approach in the congestion management, it is not possible to expose internal trades for prices competition. This implies that internal trades might be prioritized due to the existence of internal grid limitations when the above-mentioned reasons on operational security or economic efficiency apply. If so, the requests for internal exchanges will get priority access to the scarce network capacity, whereas the requests for cross-zonal exchanges can access only that part of the scarce network capacity that is not already used by internal exchanges. On occasions where the above-mentioned reasons does not apply, limitations on internal network elements will not be considered in the cross-zonal capacity calculation methods.

Generally, all cross-zonal capacities in CCR Nordic are allocated in day-ahead and intraday market couplings; only on one border PTRs for a forward timeframe are allocated. This implies that for the day-ahead timeframe there are no previously allocated cross-zonal capacities, except for one bidding zone border, where the effect of nominated PTRs to the cross-zonal capacity has to be taken into account when providing cross-zonal capacity to the allocation in the day-ahead timeframe. For the intraday timeframe there are allocated cross-zonal capacities from the day-ahead timeframe and these allocated capacities have to be taken into account when providing cross-zonal capacity to the allocation in the intraday timeframe. Besides this, if there are capacity reservations in the long-term, day-ahead, and intraday timeframe, these reservations have to be taken into account in the relevant timeframes to define previously allocated cross-zonal capacities. Rules for taking into account previously allocated cross-zonal capacity have to be defined for all bidding zone borders in the intraday and day-ahead timeframe.

Article 21(1)(b)(iv) requires to set rules on the adjustment of power flows on critical network elements or of cross-zonal capacity due to remedial actions in accordance with Article 25. Article 25 requires that at least remedial actions without cost – such as change of grid topology or other measures under TSOs’



control – have to be taken into account in the capacity calculation. The effects of the application of these remedial actions, and application of remedial actions with costs agreed with market participants – such as countertrading and redispatch –, shall be taken into account. For the FB approach, this means adjustments of the remaining available margins of the critical network elements, and for the CNTC approach it boils down to an adjustment of the cross-zonal capacity.

Article 21(1)(b)(vi) requires to set the rules for calculating cross-zonal capacity including the rules for efficiently sharing the power flow capabilities of critical network elements among the different bidding zones for the CNTC approach. The CNTC approach may be applied in CCRs, where cross-zonal capacity between bidding zones is less interdependent and each bidding zone border can be treated separately during the capacity calculation. However, if interdependency exists, the rules to model this interdependency have to be defined and then applied in the CNTC capacity calculation. The FB approach should be used as a primary approach for day-ahead and intraday capacity calculation, where cross-zonal capacity between bidding zones is highly interdependent.

Article 21(1)(b)(vii) requires, in cases where the power flows on critical network elements are influenced by cross-zonal power exchanges in different capacity calculation regions, to set the rules for sharing the power flow capabilities of critical network elements among different capacity calculation regions in order to accommodate these flows. Generally, the CCRs have been configured to minimize the influence of different CCRs to critical network elements in a CCR. This influence can occur especially in CCRs, which reside at the same synchronous area requiring cooperation between neighboring CCCs regarding exchanging and confirming information on interdependency with the relevant regional CCCs and defining together rules to take these interdependencies into account.

Article 21(2) requires that the capacity calculation methodology shall also state the frequency at which capacity will be reassessed in accordance with Article 14(4), giving reasons for the chosen frequency. Article 14(4) requires that all TSOs in each capacity calculation region shall ensure that cross-zonal capacity is recalculated within the intraday market timeframe based on the latest available information. In accordance with Article 14(4) the frequency of this recalculation shall take into consideration efficiency and operational security. The frequency of reassessment depends on updates made to the CGM and regional/national updates during the calculation process. Currently it is foreseen that there will be one dedicated European CGM model for each market time unit of the intraday timeframe. However, it is possible to make capacity reassessment based on national/regional updates to the CGMs and to increase the frequency of national/regional capacity reassessments during the intraday timeframe to ensure operational security while still having an efficient calculation process.

Article 21(3) requires that the CCM shall include a fallback procedure for the case when the initial capacity calculation does not lead to any results. This fallback procedure shall be developed for both the day-ahead and intraday capacity calculation timeframes.

Article 22 of the CACM Regulation sets requirements to the reliability margin methodology, which is part of the CCM in accordance with Article 21(1)(a)(i):



“1. The proposal for a common capacity calculation methodology shall include a methodology to determine the reliability margin. The methodology to determine the reliability margin shall consist of two steps. First, the relevant TSOs shall estimate the probability distribution of deviations between the expected power flows at the time of the capacity calculation and realised power flows in real time. Second, the reliability margin shall be calculated by deriving a value from the probability distribution.

2. The methodology to determine the reliability margin shall set out the principles for calculating the probability distribution of the deviations between the expected power flows at the time of the capacity calculation and realised power flows in real time, and specify the uncertainties to be taken into account in the calculation. To determine those uncertainties, the methodology shall in particular take into account:

(a) unintended deviations of physical electricity flows within a market time unit caused by the adjustment of electricity flows within and between control areas, to maintain a constant frequency;

(b) uncertainties which could affect capacity calculation and which could occur between the capacity calculation time-frame and real time, for the market time unit being considered.

3. In the methodology to determine the reliability margin, TSOs shall also set out common harmonised principles for deriving the reliability margin from the probability distribution.

4. On the basis of the methodology adopted in accordance with paragraph 1, TSOs shall determine the reliability margin respecting the operational security limits and taking into account uncertainties between the capacity calculation time-frame and real time, and the remedial actions available after capacity calculation.

5. For each capacity calculation time-frame, the TSOs concerned shall determine the reliability margin for critical network elements, where the flow-based approach is applied, and for cross-zonal capacity, where the coordinated net transmission capacity approach is applied.”

Article 23 of the CACM Regulation sets requirements to the methodologies for operational security limits and contingencies and allocation constraints, which is part of the CCM in accordance with Article 21(1)(a)(ii):

“1. Each TSO shall respect the operational security limits and contingencies used in operational security analysis.

2. If the operational security limits and contingencies used in capacity calculation are not the same as those used in operational security analysis, TSOs shall describe in the proposal for the common capacity calculation methodology the particular method and criteria they have used to determine the operational security limits and contingencies used for capacity calculation.

3. If TSOs apply allocation constraints, they can only be determined using:



(a) constraints that are needed to maintain the transmission system within operational security limits and that cannot be transformed efficiently into maximum flows on critical network elements; or

(b) constraints intended to increase the economic surplus for single day-ahead or intraday coupling.”

Operational security limits mean, in accordance with Article 2(7), the acceptable operating boundaries for secure grid operation such as thermal limits, voltage limits, short-circuit current limits, frequency and dynamic stability limits. The list consists of limits applied currently in the operational security analysis. Operational security limits are the same for CGM scenarios (e.g. minimum and maximum voltage and frequency limits, damping limits for voltage or rotor angle stability) and may be updated when ambient conditions (e.g. temperatures) or voltage/current ranges of devices connected to the grid (e.g. maximum currents, lowest voltages) change. Furthermore, guiding principles are needed to ensure that all TSOs in the CCR Nordic are using the same definitions when submitting operational security limits to the CCC and TSOs have to be transparent on the application of these limits. These security limits will be applied to define maximum flows across critical network elements, bidding zone borders or limiting cuts within a bidding zone.

Contingency means, in accordance with Article 2(10), the identified and possible or already occurred fault of an element, including not only the transmission system elements, but also significant grid users and distribution network elements if relevant for the transmission system operational security.

The contingencies shall be the same as those for the security analysis, generally meeting all N-1 situations, and thus there is no need to describe the particular method and criteria to be used to determine contingencies used in the capacity calculation.

Allocation constraints mean, in accordance with Article 2(6), the constraints to be respected during the capacity allocation to maintain the transmission system within operational security limits and that have not been translated into cross-zonal capacity or that are needed to increase the efficiency of capacity allocation.

TSOs may use these constraints in two occasions and they can be only used in the allocation phase, not in the capacity calculation phase. First usage of the allocation constraints is to maintain operational security in case where such constraints cannot be efficiently transformed to maximum flows on critical network elements. These constraints can be e.g. minimum production capacity or reserves within a bidding zone, or ramping constraints between market time units. Second usage of the allocation constraints is to increase economic surplus for single day-ahead or intraday coupling. These constraints can be e.g. losses on DC interconnectors.

Article 24 of the CACM Regulation sets requirements to the generation shift key methodology, which is part of the CCM in accordance with Article 21(1)(a)(iii):



“1. The proposal for a common capacity calculation methodology shall include a proposal for a methodology to determine a common generation shift key for each bidding zone and scenario developed in accordance with Article 18.

2. The generation shift keys shall represent the best forecast of the relation of a change in the net position of a bidding zone to a specific change of generation or load in the common grid model. That forecast shall notably take into account the information from the generation and load data provision methodology.”

Generation shift key means, in accordance with Article 2(12), a method of translating a net position change of a given bidding zone into estimated specific injection increases or decreases in the common grid model.

A common generation shift key shall be developed for each bidding zone and scenario. Generation shift keys will be used to translate a change in net positions into specific nodal injections in the common grid model to reflect best the forecasted change in generation or load within a bidding zone.

Article 25 of the CACM Regulation sets requirements to the methodology for remedial actions in capacity calculation, which is part of the CCM in accordance with Article 21(1)(a)(iv):

“1. Each TSO within each capacity calculation region shall individually define the available remedial actions to be taken into account in capacity calculation to meet the objectives of this Regulation.

2. Each TSO within each capacity calculation region shall coordinate with the other TSOs in that region the use of remedial actions to be taken into account in capacity calculation and their actual application in real time operation.

3. To enable remedial actions to be taken into account in capacity calculation, all TSOs in each capacity calculation region shall agree on the use of remedial actions that require the action of more than one TSO.

4. Each TSO shall ensure that remedial actions are taken into account in capacity calculation under the condition that the available remedial actions remaining after calculation, taken together with the reliability margin referred to in Article 22, are sufficient to ensure operational security.

5. Each TSO shall take into account remedial actions without costs in capacity calculation.

6. Each TSO shall ensure that the remedial actions to be taken into account in capacity calculation are the same for all capacity calculation time-frames, taking into account their technical availabilities for each capacity calculation time-frame.”

Remedial action means, in accordance with Article 2(13), any measure applied by a TSO or several TSOs, manually or automatically, in order to maintain operational security. Remedial actions can be applied



also in the capacity calculation phase, where each TSO shall individually define the available remedial actions to be taken into account to meet the objectives under Article 3 of the CACM Regulation.

Remedial actions without costs (such as grid topology change, phase shifter actions, system protection schemes¹) shall be taken into account in the capacity calculation.

Each TSO has to coordinate the use of remedial actions, to be taken into account in the capacity calculation, with other TSOs in the same CCR. Remedial actions can be taken into account in the capacity calculation on the condition that the remedial actions available after the capacity calculation are sufficient to ensure operational security.

The remedial actions to be taken into account in capacity calculation shall be the same for all capacity calculation time-frames (from day-ahead to intraday timeframe), taking into account their technical availabilities for each capacity calculation timeframe.

Article 26 of the CACM Regulation sets requirements to a cross-zonal capacity validation methodology, which is part of the CCM in accordance with Article 21(1)(c):

“1. Each TSO shall validate and have the right to correct cross-zonal capacity relevant to the TSO's bidding zone borders or critical network elements provided by the coordinated capacity calculators in accordance with Articles 27 to 31.

2. Where a coordinated net transmission capacity approach is applied, all TSOs in the capacity calculation region shall include in the capacity calculation methodology referred to in Article 21 a rule for splitting the correction of cross-zonal capacity between the different bidding zone borders.

3. Each TSO may reduce cross-zonal capacity during the validation of cross-zonal capacity referred to in paragraph 1 for reasons of operational security.

4. Each coordinated capacity calculator shall coordinate with the neighbouring coordinated capacity calculators during capacity calculation and validation.

5. Each coordinated capacity calculator shall, every three months, report all reductions made during the validation of cross-zonal capacity in accordance with paragraph 3 to all regulatory authorities of the capacity calculation region. This report shall include the location and amount of any reduction in cross-zonal capacity and shall give reasons for the reductions.

6. All the regulatory authorities of the capacity calculation region shall decide whether to publish all or part of the report referred to in paragraph 5.”

¹ Please note that system protection schemes might bring a cost when they need to be activated.



3 Introduction to Flow Based methodology

The purpose of this chapter is to introduce the Flow Based capacity calculation method (FB) and highlight the differences compared to CNTC. This introduction will be relatively high level and aims at giving the reader the overall understanding of FB and the motivation behind using the method before moving in to more technical descriptions in the subsequent chapters.

3.1 Motivation behind introducing FB in the Nordics

In the energy markets, the transmission system will always be a constraining factor limiting how much energy can be transferred between any two points in the grid. Even if these limitations might be removed by new investments, investments in transmission capacity is capital intensive and has a diminishing marginal value. Thus expanding the transmission system into an unlimited state is realistically unfeasible due to simple economics. This limiting nature of the transmission system creates a need to have a methodology to optimize the utilization of the system according to the societies demand for electric power, and the complex physical limits of the grid must be expressed in a simplified manner to be communicated and understood by the commercial energy market.

Renewable energy is also a factor that creates a need for focusing of optimizing the scarce transmission capacity. When renewable energy is integrated into an energy system, the placement of the renewable energy can often be concentrated due to advantageous geographical areas, and weather patterns like wind that moves across geographical areas which creates large differences in production volumes. To accommodate the difference in production there is a need to transport large quantities of electrical power across regions. An example of this could be a windy day in the south west of Scandinavia. In such situations, Denmark has excessive wind production at a low marginal cost. This excess power could be moved to Sweden and Norway at higher prices, thus optimizing the value of the renewable production. In turn on a day with low wind, Denmark can benefit from the hydro production in Norway. To illustrate the current Nordic power grid please see the Figure 3-1 below.



Figure 3-1 Map showing the transmission grid in the Nordics (ENTSO-E, 2016). The transmission grid is needed to transport electric power from sites of generation to sites of consumption, but has a limited capacity to transmit electric power



In reality, a power system is a non-linear system with endless complexities. However, the algorithms used to calculate the electricity prices and volumes has been simplified in order to meet operational requirements. One of the simplifications is the representation of transmission capacities. In the price calculation algorithm, transmission capacities are represented as linear constraints where all interconnectors are modeled as fixed numbers. This gives the TSO's the task of supplying accurate information to the algorithm while still respecting the constraints on linearity. Another of the simplifications is the representation of bidding zones. In reality, a power system consists of nodes that might geographically be located anywhere. In the simplification a large set of nodes are clustered together in a bidding zone, and the transmission grid is represented as bidding zone borders, thus congestion occurs on these borders in the energy market, but in reality they could be caused by any one of the internal nodes and lines not only at the borders.

The better the representation of the grid is in the energy market, the more accurate the TSO can feed physical constraints into the price calculation algorithm. The motivation behind introducing FB, is that FB has the potential to better account for the physical flow and constraints compared to the current method NTC or CNTC. A better representation gives a better chance of optimizing the utilization of the scarce transmission capacity, which should lead to more accurate price signals and increased social economic welfare.

Over the last ten years several new DC interconnectors have been installed in both the Nordic region as well as across Europe, and in the coming years we expect further development of the transmission grid in terms of interconnections. Europe has also seen a sharp increase in the amount of renewable energy in the system, and in order to fulfill emission reduction targets it is expected to increase further. This development has increased the interdependency as well as the complexity of the power system, and has added uncertainty of production patterns. This has made it increasingly difficult to decide how to share exchange capacity for different bidding zone borders within the current capacity calculation approach.

According to the CACM, the future calculation and market design for the European day-ahead (DA) and Intraday (ID) markets may be either FB or a Coordinated Net Transmission Capacity (CNTC) approach. However the CACM requires that *“TSOs may jointly request the competent regulatory authorities to apply the coordinated net transmission capacity approach if the TSOs concerned are able to demonstrate that the application of the capacity calculation methodology using the flow based approach would not yet be more efficient compared to the net transmission capacity approach and assuming the same level of operational security in the concerned region”*. It is not assumed that the CNTC method is as efficient in the Nordic region. This is due to the presence of high levels of renewables and the relatively large number of interconnectors between bidding zones. This assumption effectively means that the Nordic region has to develop FB as the capacity calculation method in the future.

To illustrate the complexity and challenges within the Nordics, the interdependencies in the power grid are illustrated in Figure 3-2 Contractual flows vs physical flows in the Nordic Grid. Power is injected in NO3 and consumed in SE2. The figure illustrates a situation with a generation increase in NO3 that is



3.2 Description of FB

In order to understand the FB method this section will to some extent compare the differences of FB and CNTC, this is to help the reader understand the changes in the capacity calculation method once the method is switched from the current Net Transmission Capacity (NTC) to FB. It is important to note that NTC is not CACM compliant which means that changes have to be made even if FB didn't have additional benefits compared to CNTC.

The Nordic DA power market is part of the larger European power market. Market participants submit supply and demand bids to the Nominated Electricity Market Operator² (NEMO). The NEMO forwards the bids to the joint European market coupling function where the European market algorithm, Euphemia, solves a European-wide market equilibrium, based on explicit economic welfare optimization. The organization of the ID market is slightly different from the DA market. In the ID market, market participants submit bids to the NEMO who forwards the bids to the ID market platform. However there is no explicit welfare optimization, rather a continuous matching of bids. The process may look different from the DA process, but in essence the outcome will be an implicit optimization of economic welfare.

The market outcome of the ID and DA process has to respect the physical limitations of the power grid. For this purpose, the TSOs currently provide exchange capacities between bidding zones to the market. The exchange capacities act as constraints to the market-coupling algorithm.

In FB the algorithm receives constraints in the format of Power Transfer Distribution Factors (PTDF) and Remaining Available Margins (RAM), rather than exchange capacities between bidding zone borders, but essentially RAM can be understood as the capacity allocated to the market. To understand what PTDFs are, it is useful to illustrate the difference between FB and CNTC using a simple three-zone grid.

² There may be more than one NEMO in an area, but this does not change the procedure, the market participant just chooses one of the approved NEMOs.

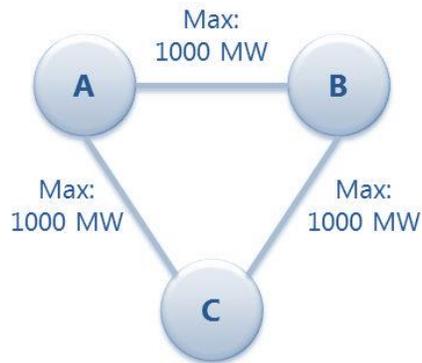


Figure 3-3 Grid with three Zones

In this example there are no internal constraints within the bidding zones, complex grid limitations or outages being considered. This means that the only limiting grid elements are the connecting lines between the zones³. All lines have a thermal capacity of 1000 MW and equal impedance (equal “electrical distance”). This thermal capacity of 1000 MW is referred to as Remaining Available Margins (RAM). RAM is the factor limiting the power that may in sum flow on a particular grid constraint coming from all bidding zones at once. Zone C is a consumption zone while zones A and B are generation zones. At the time of capacity calculation (D-1)⁴, the TSO does not know the final net position in the zones, only the physical property of the grid is known. Due to the grid topology, one MW produced in A will induce a flow of 2/3 MW on the line AC, 1/3 MW on the line AB and 1/3 MW on the line BC. The same holds true for generation in B of which -1/3 appears on AB, 1/3 on AC and 2/3 on BC. These factors are known as PTDFs. PTDFs are factors which show how much power is flowing on a particular grid constraint (CNE or cut) when injecting one additional MW in a particular bidding zone.

In this example zone C is a “slack node”, this means that all power injected in A and B is (mathematically) absorbed in C. The same holds true for zone C itself, all power injected in C is absorbed in C. The flow influence of each zone to each line defines the PTDF matrix in Table 3-1.

³ This is a simplification – in reality constraints in the form of CNEs or cuts can be anywhere inside the bidding zone.

⁴ The capacity calculation starts at D-2. Final values are provided to the market at D-1



Table 3-1 PTDF matrix of the grid in Figure 3-3

Line	RAM	A	B	C
A->B	1000	1/3	-1/3	0
A->C	1000	2/3	1/3	0
B->C	1000	1/3	2/3	0

The main difference between FB and CNTC is that in the CNTC method the factors above would not be provided to the market operator (NEMO), which means that only FB has a built-in representation of the actual flows. In CNTC an example could be that it is assumed that one MW produced in A flows with an equal distribution between AC and AB/BC. This would allow the market algorithm to carry 2000 MW from A to C, as this would create a flow of 1000 MW on AC and 1000 MW on AB/BC. In reality this would create an overload as the PTDFs show that 2000 MW injected in zone A would create a physical flow of $2/3 * 2000 = 1333$ MW on line AC which is in breach of the thermal limits. In this case a possible way to solve the issue in the CNTC method is to limit the exchange capacity to 750 MW on AC and AB/BC, other solutions are also feasible e.g. setting AC to 1500 MW and AB/BC to 0 MW.

The FB method will yield a larger set of possibilities, as this method will take the PTDF matrix into account. An example of this would be a situation where the following injection is made $A=2000$, $B=-2000$ and $C=-1000$, this would induce a flow of $2000 * 1/3 - 1000 * (-)1/3 - 1000 * 0 = 1000$ on line AB

The solution domains for CNTC and FB are illustrated in Figure 3-4 below.

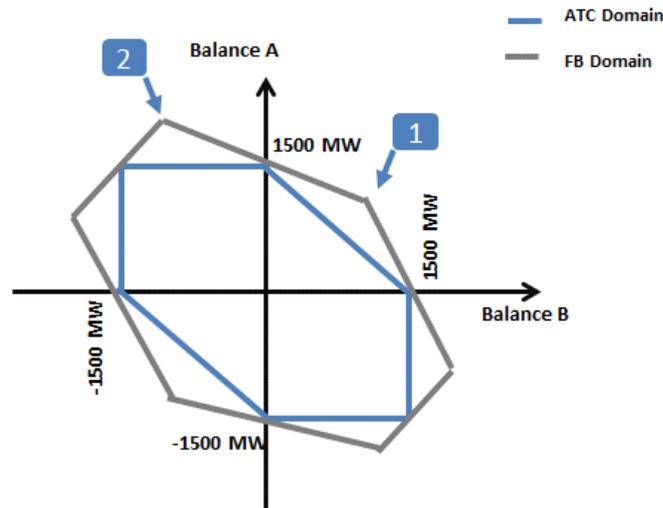


Figure 3-4 CNTC and FB domains

As it is shown in the figure all CNTC solutions are contained in the FB solution domain. This means that FB has at least the same amount of possible solutions and theoretically more. All points on the FB boundaries reflect capacity limits in the grid that will induce price differences in all nodes, without implying that all lines are congested simultaneously. This market position is however not possible in CNTC due to the fact that the CNTC algorithm doesn't know the real physical flows (the PTFDs) between bidding zones.

It is important to note some simplifications of the FB method. As mentioned earlier in this chapter multiple nodes are combined into one bidding zone. In the pure version of FB called nodal pricing, each node would constitute its own bidding zone or bidding node, essentially having its own price, thus no CNE or cut exist inside a node. In FB nodes are combined into bidding zones. This is done to satisfy the practicality in keeping the number of bidding zones relatively low – in the Nordic region we have 12 bidding zones. A new issue arises when combining nodes into bidding zones; How to secure a balance between generation and consumption in each node if the price – in contrast to Nodal pricing – cannot be used as the balancing mechanism?

This issue is solved using Generation Shift Keys (GSK). The GSK is a value which is used in the translation from node-to-CNE PTFDs to zone-to-CNE PTFDs. The relation is formally expressed as:

$$PTDF_{i,j}^A = \sum_{\forall \alpha} GSK^{\alpha} PTDF_{i,j}^{\alpha}, \quad \text{and} \quad \sum_{\forall \alpha} GSK^{\alpha} = 1 \quad (1)$$

$PTDF_{i,j}^A$ = Sensitivity of line i,j to injection in area "A"

$PTDF_{i,j}^{\alpha}$ = Sensitivity of line i,j of injection in node "α"

GSK^{α} = Weight of node α on the PTFD of area "A"



FB makes use of GSKs to describe how the net position of one node changes with the net position of the bidding zone it is a part of, hence the GSKs for a particular bidding zone shall sum to 1. There is no theoretically right or wrong way to generate GSKs. However it is important to understand that the choice of method will influence the market. A poor choice of GSK strategy can result in extensive market influence, thus making GSKs one of the biggest sources of inaccuracies of the FB parameter calculation. The perfect strategy would mimic the market outcome of Nodal pricing, but this is not possible as this would require perfect foresight of the TSO (and in this case there would be no argument for having a market based power system operation, we could go back to the “old monopoly days”).

The GSK parameters are once again linear depictions of a complex non-linear process. The simplest form of GSK strategy is called flat participation. This means that each node will have equal impact on a particular CNE, described by PTDFs to zone-to-CNE. This can result in more generation from one node than the max installed capacity or other curiosities. The strength of GSK strategies is that the design is not limited to using one strategy for all bidding zones. It is possible that the optimal strategy for each bidding zone is different, and different time stamps within bidding zones might need different strategies as well. It is fully possible in the FB method to account for differences in optimal GSK strategies, however identifying the optimal GSK strategy for each bidding zone and each time stamp is quite extensive, and can change over time. It is however a requirement in CACM that the rules guiding GSK strategies are harmonized across TSOs as they have such a large impact on market outcome.

In the initial version of the FB procedure, the flat GSK strategy is chosen. However outcomes from other GSK strategies will be monitored, and can give a basis for developing FB in a later version.

Another imperfection of FB can be loop flows. Loop flows arise when a commercial trade within a bidding zone creates flows that run through other bidding zones to end back in the original bidding zones. Loop flows do not exist in a nodal pricing system; in FB they arise as a consequence of keeping the existing bidding zone structure. In the ACER recommendations “On the common capacity calculation and re-dispatching and countertrading cost sharing methodologies” it is specified as a general principle that cross zonal capacities should not be lowered as a consequence of loop flows. In the short run loop flows have to be handled by remedial actions such as counter trades and re-dispatch. In the medium term it should be handled by reconfiguring bidding zones, and in the long run they should be handled by investments in the transmission grid.

The Nordic power system is far more complex than illustrated in the simple three-zone grid in Figure 3-3. Thus, the complexity of assigning exchange capacity is also far more complex. This is illustrated in Figure 3-5, with the real bidding zones and connections in the Nordic system.

There are currently twelve bidding zones within the Nordics and five connected external bidding zones in the CCRs of Core, Hansa and the Baltic. Altogether, there are 26 connections between bidding zones within the Nordics and between the Nordics and the external areas in other CCRs. For each connection,



there is one exchange capacity in each direction for each hour of the day, and thus, the Nordic TSOs provides 1248 hourly exchange capacities per day, and 455 520 hourly exchange capacities per year.

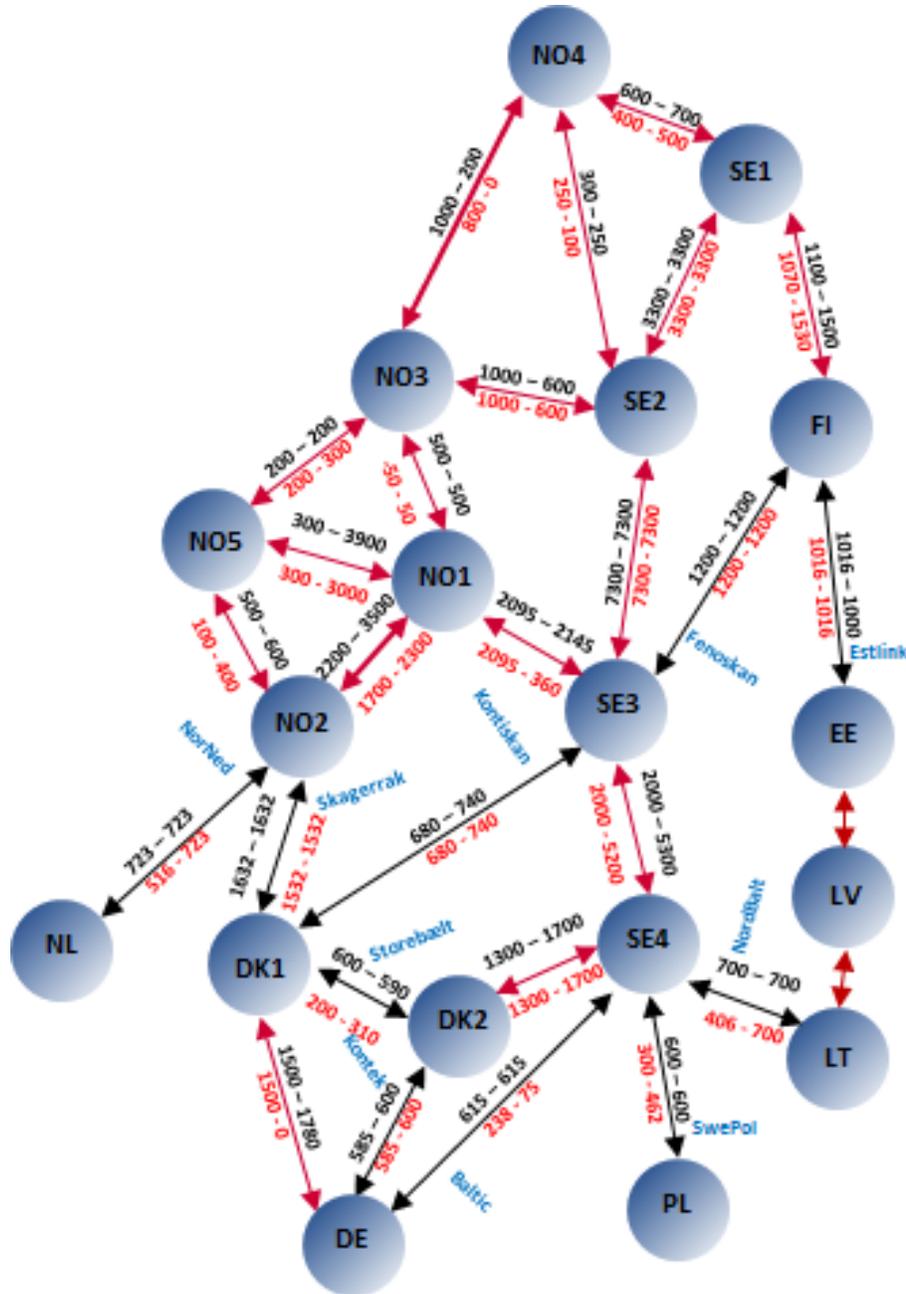


Figure 3-5 The Nordic power system.

This figure gives a schematic overview of the Nordic power system. AC connections are illustrated by red arrows and DC connections by black arrows. The Max exchange values for each connection is shown in black numbers, together with the provided exchange capacities for Jan 6th 2017 at hour 10:00 – 11:00 in red numbers. The differences are due to both loop flow considerations and the outage situation on the relevant day. The Nordic Bidding zones DK1, DK2, SE4 and FI are radially connected to the rest of the Nordic AC system, and thus not influenced by loop flows. The rest of the Nordic system is interdependent and influenced by loop flows.



4 ACER recommendation on Capacity Calculation

ACER launched a recommendation on capacity calculation and re-dispatching and countertrading cost sharing methodologies on 11 November 2016. In the ACER Recommendation "*On the common capacity calculation and re-dispatching and countertrading cost sharing methodologies*", the Agency proposes three general principles to guide the TSOs in developing and the Regulators in approving the Capacity Calculation Methodology. The ACER recommendation is a non-binding advice, and two of the principles relate to the CCM. In line with the binding rules for congestion management, as laid down in Regulation 714/2009 and its Annex 1, both recommended principles are subordinate to reasons of operational security and economic efficiency. This chapter describes how the ACER recommendation is foreseen to be included in the Nordic CCM.

The ACER guidance, subject to the restrictions following from operational security and economic efficiency, are the following:

High-Level Principle 1:

- *As a general principle, limitations on internal network elements should not be considered in the cross-zonal capacity calculation methods. If congestion appears on internal network elements, it should in principle be resolved with remedial actions in the short term, with the reconfiguration of bidding zones in the mid-term and with efficient network investments in the long term.*

Source: ACER Recommendation page 8

High-Level Principle 2:

- *As a general principle, the capacity of the cross-zonal network elements considered in the common capacity calculation methodologies should not be reduced in order to accommodate loop flows.*

Source: ACER Recommendation page 9

4.1 General influence of the ACER recommendation on the proposed CCM

As a point of departure, the scope of the ACER recommendation for the CCM proposal is outlined in this section. It is noted that the CCM proposal shall not take bidding zone re-configuration or investments in network element into account, cf. ACER recommendation:

This Recommendation, and the high-level principles set out herein, focuses on the short-run solutions, which should be considered as transitional measures until the enduring solutions are implemented.

Source: ACER Recommendation page 8

The enduring solutions are not part of the CCM proposal, as also motivated by fact that re-configuration and investment are part of other processes:



1. Re-configuration of bidding zones will be able to cope with both issues, however bidding zone re-configuration is out of scope for this proposal on CCM as the assessment of the need for – and decision on amended bidding zone configuration falls under the bidding zone review, cf. CACM article 32. The CCM proposal takes the bidding zone configuration as given, thus this is not part of the CCM proposal
2. Efficient network investment might also be able to cope with both high level principles, however less for the loop flow issue. As decision for investment in the Nordic grid is part of other Nordic activities, e.g. TYNDP, consideration on this is also not part of the CCM proposal

Having said that, it shall however be emphasized that the proposed CCM is robust in terms of future amendments of bidding zone re-configuration and investment in new grid elements, lines and interconnectors, but it leaves remedial actions as the default solution to manage internal constraints in relation to the CCM proposal.

The influence of both ACER recommendations is developed further in the two sections that follow for the flow based method.

4.2 The influence of the first ACER recommendation on the proposed CCM

The first principle relates to the selection of which grid constraints that will enter the capacity calculation. This choice is however not essential or relevant for the capacity calculation approaches itself. FB does not distinguish between internal and external constraints, and any number of grid constraints might enter into the FB parameter configuration, independently of these constraints are internal or external. Thus, FB will work independently of which network constraints are considered relevant in the market domain.

In the Nordic power system, particularly in Norway, a high share of the grid constraints is located within the bidding zones, not on the border. Moreover, most borders are bi-directional with different grid constraints limiting in different directions. As bidding zone re-configuration and investment are left out in terms of proposal for CCM, cf. above, the Nordic CCM will include available remedial action as the default solution to relief congestion and provide maximum capacity on internal constraints in compliance with safety standards of secure network operation.

If all internal grid constraints and loop flows are disregarded in capacity calculation, the resulting market outcome will provide extensive overloads on internal constraints that must be "solved" by planned countertrade or re-dispatch to bring the system back into a secure state. In reality, more capacity is offered to the market than what is physically available, which will bring along a high probability for overloads and a severe increase in system operation costs. In other words, the TSOs would be offering more capacity to the market than what is physically safe (e.g. "virtual capacity"). Presently, it is not clear how this should be managed in real operation and whether it is at all possible to guarantee safe operation under such circumstances.



Moreover, in this situation, the market clears on unrealistically high transmission capacity, and market prices are distorted with possible adverse effect on the dispatch planning. When the market moves into an unsecure position, the TSOs will have to move the market "back" to a secure position before the operating hour. If this has to be done by **countertrade**, the best counter trade prices obtainable for the TSOs will be the same prices that alternatively had cleared the DA market or higher. Because of this, **it is extremely unlikely that planned counter trade promotes welfare economic efficiency compared to the market solution at correct capacity.**

There is however a difference if the market is moved back to a secure position by re-dispatch (or special regulation). Contrary to a counter trade, which is a cross border operation, with up-regulation somewhere in one of the bidding zones and down regulation somewhere in the other bidding zone, a re-dispatch is a more local operation, taking place inside a bidding zone to relieve an internal constraint. The reason this may take on a positive efficiency implication, is that all market participants inside a bidding area are faced with the same day ahead market price regardless of their influence on any internal (or external) constraints. Thus, there might be internal re-dispatch options that are more efficiently solving an internal congestion than the one provided by the market solution. By exploiting this option, the TSO might in some situations be able to "mimic" a nodal price solution inside a bidding area, and thus improve the efficiency of the market solution. For this to hold, the final cost of dispatch of generators, after the re-dispatch, have to be less than the final cost of dispatch of generators in an alternative situation where congestion are managed by utilizing the constraints in the capacity provided for the market. In general, this can be expressed as:

$$C_i^{RD-n}(p_i^U - p_i^D, PTDF_n^{RD}) \leq C^{ij-n}(ABS[P_i - P_j], PTDF_n^{ij}) \quad (2)$$

Where:

C_i^{RD-n} = Cost function of relieving a congestion "n" by a re-dispatch in bidding zone i

p_i^U = Price of up-regulation in bidding zone i

p_i^D = Price of down-regulation in bidding zone i

$PTDF_n^{RD}$ = The influence on congestion "n" of a re-dispatch in bidding zone i

C^{ij-n} = Cost function of relieving congestion "n" in bidding zone i by restricting market capacity between bidding zones i and j

$PTDF_n^{ij}$ = The influence on congestion "n" of a commercial exchange between bidding zones i and j

P_j = Market price in area "j"

P_i = Market price in bidding zone "i"



The formula states that the cost of re-dispatch is a function of the regulating power prices in the bidding zone, and the efficiency of a re-dispatch in relieving a congestion is expressed by the PTDF. Similarly, the cost of relieving a constraint by market capacity is a function of market prices and the efficiency of relieving the congestion by the market flow, expressed by the zone-to-zone PTDF.

In the current capacity calculation, re-dispatch is used and regularly considered an alternative for managing internal congestions by the market capacity. The assessment whether to manage a particular congestion by the market capacity or by a re-dispatch, is done by considering if the market capacity (indirectly the $PTDF_n^{ij}$) is a technical efficient way of managing the congestion, and to what extent re-dispatch resources are available. In most cases, this is sufficient to find an efficient solution because the price difference of up- and down-regulating power normally is much larger than the price differences on bidding zone borders.

However, if we rearrange the above formula, we might express an "optimal" threshold for which internal CNEs should be considered in capacity calculation:

$$PTDF_n^{ij} \geq F(p_i^U - p_i^D, ABS[P_i - P_j], PTDF_n^{RD}) \quad (3)$$

In the above formula, the optimal threshold is expressed as a function "F" of regulating power prices, market prices and the efficiency of re-dispatch. In the current FB simulations in the Nordic project, a threshold of 15% for the zone-to-zone PTDFs are used (see chapter 6.2). This could however be improved along the lines of the above function.

Thus, considering welfare economic optimality and operational security, the only viable measure to adapt to the ACER recommendations is for the TSOs to obtain exemptions for considering internal grid constraints in capacity calculation based on reasons of operational security and economic efficiency. It must be recognized that the ACER recommendation allows for inclusion of internal CNEs in ID and DA CC:

- *Any deviation from the general principle, by limiting cross-zonal capacity in order to solve congestion inside bidding zones, should only be temporarily applied and in those situations when it is:*
 - (a) needed to ensure operational security; and*
 - (b) economically more efficient than other available remedies (taking into account the EU-wide welfare effects of the reduction of cross-zonal capacity) and minimises the negative impacts on the internal market in electricity.*

And further:

- *(4)The deviations should be of a temporary nature. However, in cases where deviations from the general principle are more efficient than any other available mid-term and long-term solution, TSOs may propose to NRAs to continue applying the deviations.*

Source: ACER Recommendation page 9



Based on the above arguments, the Nordic TSOs will include internal CNEs in the DA and ID capacity calculation and substantiate that it is needed in order to ensure operational security and economic efficiency. It is important to emphasize that the default solution for management of an internal constraint, will be remedial actions as re-dispatch. For some (significant) constraints, which can be managed with higher economic efficiency and are needed to ensure operational security, the Nordic TSOs may find that these should be part of the set of FB parameters, which are submitted to the NEMOs on a daily basis. Including these in the price calculation at the NEMOs will not decrease cross-zonal capacity, but might restrict the flow of energy below the “cross-border RAM” on the interconnector.

The CNEs that are not significantly influenced by cross-zonal trades can be identified from the PTDF matrix. If there is small variation between the PTDF values (indicating how changes in the net position of the bidding zones influence the flow on the CNE), then it indicates that a cross-zonal trade will have a relatively small impact on the CNE compared to CNEs with a large variation of the PTDFs. The maximum impact from cross-zonal trades on the CNE is the difference between the largest and smallest PTDF value. The Nordic TSOs propose to exclude CNEs where the maximum impact on the CNE is less than a given percentage of the cross-zonal flow. There exist no correct percentage, but what percentage to actually apply will be analyzed by the time of parallel run and continue as flow based is being implemented; initially each TSO shall apply a threshold value of 15 % and above for significant influence. The TSOs may apply different criteria to different CNEs, if special circumstances dictate (e.g. if there are very good, or very poor access to local remedial actions).

The TSOs may also consider the FRM value when determining whether a CNE is significantly impacted by cross-zonal trade. In the case where the FRM is relatively large compared to the total capacity of the CNE, it may indicate that the uncertainty regarding the flow on the CNE is highly influenced by factors other than the results of the price coupling. These could be inaccuracies in modelling the CNE for capacity calculation (e.g. linearization errors) or high uncertainty regarding the flow on the CNE (e.g. if the CNE is highly impacted by local production or load which is hard to forecast accurately).

4.3 The influence of the second ACER recommendation on the proposed CCM

The second principle does have an impact for the FB approach. The reason for this being that the FB approach is managing transit flows directly in the market mechanism by the use of the PTDFs allocating flows on different CNEs. Only loop flows are external in the FB approach and cannot be managed by flow based without turning the loop flows into transit flow by re-configuration of bidding zones. External flows are due to:

- Loop flows, which are flows on a border resulting from trades *within* a bidding zone, hence the flow starts and ends in the same bidding zone, but utilizes the grid in one or more adjacent bidding zone



- Transit flows, which are flows on a border resulting from trades *between* bidding zone, hence the flow starts and ends in different bidding zone, but utilizes the grid in one or more adjacent bidding zones

In Figure 4-1 the difference between loop – and transit flows are illustrated. The yellow arrow illustrate the flow, which in the left panel starts and ends in same bidding zone and in the right panel starts and ends in different bidding zones.

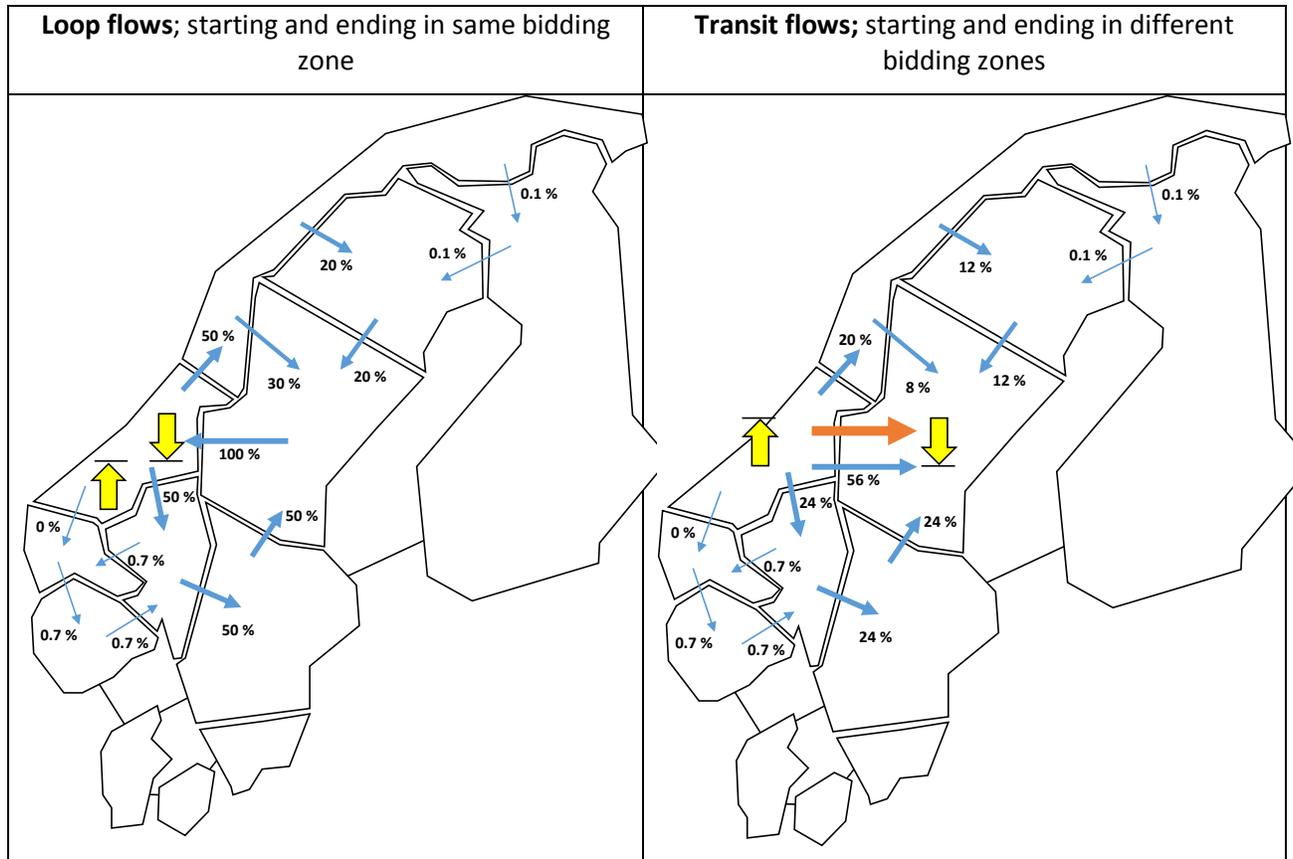


Figure 4-1: The difference between the concepts of loop and transit flows

Flows not managed by the market mechanism are external effects to the market. In order to maintain operational security, these are normally considered within capacity calculation, directly limiting the provided XB capacity (see also section 11.2.4). Thus, in FB, external flows (i.e. the transit flows) are internalized and creating a level playing field for internal and external flow, hence undue discrimination between internal and cross-zonal flow are avoided.

The chosen approach in order to cope with loop flows is to implement proper bidding zone delineation, in principle dividing one bidding zone into two, hence loop flows are turned into transit flows. In this way



FB can internalize external flows. However, it is not part of the CCM proposal to suggest amendments of bidding zone delineation, as this is part of the bidding zone study, cf. the procedure set up in CACM chapter 2. The CCM proposal therefore includes remedial actions as the default solution to manage loop flows.

It is, however, recognized that the ACER recommendation allows for possible inclusion of Cuts in ID and DA CC. If other things than thermal limits cause the need for decrease of cross-zonal capacity (due to loops flows), capacity may be reduced

- *(...)This implies that the full thermal capacity of the cross-zonal network elements, (...)should be considered in capacity calculation. Nevertheless, in few specific cases the cross-zonal exchanges may be limited by other operational security limits than thermal limits (e.g. voltage stability, dynamic stability etc.). In these cases, the capacity of the cross-zonal network elements may be reduced below the level of the full thermal capacity reduced by reliability margin.*

Source: ACER Recommendation, footnote 14 page 9

Nordic TSOs include relevant Cuts in the DA and ID capacity calculation and prove that it is needed to ensure operational security and that it is efficient.



5 Definition of “undue discrimination”

The proposed CCM outlined in the next chapters and in the legal proposal may not entail undue discrimination between market players. Especially do the CACM article lay down that the CCM should not undue discriminate between internal and cross-zonal exchanges:

- (...)rules for avoiding undue discrimination between internal and cross-zonal exchanges to ensure compliance with point 1.7 of Annex I to Regulation (EC) No 714/2009;

Source: CACM article 21(l)(b)(ii)

The CACM does however not define the term “undue discrimination”. This section defines the concept of undue discrimination.

One key objective of the CACM guideline (and Regulation 714/2009) is to secure that the CCM development meets the objective of fair and equal treatment of all market players, hence undue discrimination of market player access to the market place must not take place.

In order to develop a CCM in line with the objective of CACM, it is needed to make a more concrete definition of the understanding of “undue discrimination” – in particular the word “undue”. This section attempts to define undue discrimination. The overall objective of the European single electricity market is used as a point of departure.

The overall objective of the operation of the single electricity market is maximization of social welfare, which concretely is understood as:

- The generation of electricity in short and long term shall be done in a least-cost way
- The allocation of electricity to consumers, done through the matching of bids, shall be done in accordance with willingness to pay, giving rise to electricity being used as input in activities with high value added in both a short- and long-term perspective.

If these objectives are fulfilled, the market is operated in an economic efficient manner, meaning that no re-dispatch of generation or re-allocation of consumption will increase the overall social welfare.

To fulfill this objective it is important that all market players have fair and equal access to the market and no undue discrimination takes place. The capacity calculation methodology shall provide access to the market actors on equal footing, given the current physical infrastructure and operational security. The only selection criteria that can be used in determining who is going to supply and who is going to purchase in a given time frame, are the competitiveness of the bids submitted by the market players and the objective of operating the power system in a secure manner.

Put in other words; market parties cannot be treated differently in terms of getting access to supply or purchase, only when it comes to bid prices or for the sake of secure operation. Using these principles one can distinguish between (legal) “discrimination” and (non-legal) “undue discrimination”:



- Discrimination: choosing between two suppliers “A” and “B” to supply to the market, the supplier with the lowest bid price will be selected before the other to supply in the market, where bid prices are used as selection criteria or “discrimination tool”. Only if this does not comply with secure operation, the suppliers with the higher bid may be selected first
- Undue discrimination: If neither competitiveness of bid prices or secure operation of the power system can be used as arguments for providing access to the market for market player “A” before “B”, “B” is undue discriminated as neither competitiveness of bid nor secure operation can justify the need for discrimination. In this case “B” is undue discriminated.



6 DA Capacity calculation methodology

This chapter presents the capacity calculation methodologies of flow based.

Article 21(1b) requires the proposal for a common capacity calculation methodology to contain a mathematical description of the approach:

“(i) a mathematical description of the applied capacity calculation approach with different capacity calculation inputs;

(ii) rules for avoiding undue discrimination between internal and cross-zonal exchanges to ensure compliance with point 1.7 of Annex I to Regulation (EC) No 714/2009;

(iii) rules for taking into account, where appropriate, previously allocated cross-zonal capacity;

(iv) rules on the adjustment of power flows on critical network elements or of cross-zonal capacity due to remedial actions in accordance with Article 25;

(v) for the flow-based approach, a mathematical description of the calculation of power transfer distribution factors and of the calculation of available margins on critical network elements;”

The following sections provide these descriptions of the methodologies.

6.1 Detailed description of the FB capacity calculation approach

6.1.1 Mathematical description of the capacity calculation approach

The flow-based approach provides constraints to the market coupling algorithm, and maintains the essential physical properties of a meshed AC grid. Transmission of electrical power between two bidding zones will spread throughout the electrical network in accordance to the impedance of the different paths.

Because the market coupling process only accepts linear grid constraints, the capacity calculation includes a methodology for creating a simplified representation of the grid constraints that adhere to this requirement. Within FB, the result of this simplification is the power transfer distribution factors (PTDFs) that applies for both CNEs and Cuts.

The MW limit for each grid constraint is termed the remaining available margin (RAM), which is the amount of grid capacity available to the market coupling process. The value of the RAM is determined, after various deductions, from the total available margin of the grid constraint. These deductions include at least the flow reliability margin (FRM), nominations of long term transmission rights (LTTR), and internal loop flows in the bidding zones.

For each flow-based constraint provided by the TSOs, the market coupling process will apply the constraint in the capacity allocation as shown in (4).



$$NP \cdot PTDF \leq RAM \quad (4)$$

NP refers to the vector of bidding zone market net positions within the flow based region, PTDF refers to the matrix of PTDFs for the bidding zones in the flow based region calculated for the specific constraint, and RAM refers to the available margin on the constraint. The "." sign refers to the dot product of the vector NP and matrix PTDF.

The PTDFs and RAMs together form the set of flow based parameters describing the available transmission capacity between a set of bidding zones.

The set of bidding zones covered by a set of flow based parameters is naturally limited by DC links, such as the Skagerrak (between DK1 and NO2) and KontiSkan (between DK1 and SE3) interconnectors. This is because the transition between the AC grid and the DC links do not allow for the calculation of fixed PTDFs. The implication is that a set of flow-based parameters is limited to a synchronous region, and that two separate sets of flow-based parameters will be provided for the Nordic capacity calculation region since Jutland is a separate synchronous region from the rest of the Nordic CCR.

6.1.2 Mathematical description of the calculation of power transfer distribution factors and of the calculation of available margins on critical network elements

The power transfer distribution factors (PTDFs) will be calculated from an AC load flow model (the common grid model), applying the simplifications necessary to create a linear approximation. This section starts with a short introduction of the basics of the AC power flow equations and shows how the PTDFs are calculated.

For a grid constraint that includes either a contingency or a remedial action, requiring the disconnection of grid components, generators, or loads, the PTDFs will be calculated to represent the system state after the disconnections. This will minimize the errors, but means that the full set of PTDFs for all grid constraints do not represent the same grid state / model. Instead, the PTDFs for each grid constraint will represent the correct state of the power system after the disconnection.

The calculation of the PTDFs will start from an AC power flow model for the forecasted state of the electricity system⁵. The active and reactive power flows in steady state can be described by the power flow equations (5) and (6)).

$$P_i = V_i \sum_{k=1}^n V_k (G_{ik} \cos(\delta_i - \delta_k) + B_{ik} \sin(\delta_i - \delta_k)) \quad (5)$$

⁵ The calculations leading up to equations (2) & (3) is found in Grainger, J. & Stevenson, W. (1994). "Power System Analysis", New York: McGraw-Hill. ISBN 0-07-061293-5.



$$Q_i = V_i \sum_{k=1}^n V_k (G_{ik} \sin(\delta_i - \delta_k) - B_{ik} \cos(\delta_i - \delta_k)) \quad (6)$$

Where:

- P_i = Active power balance in node i (per unit MW)
- Q_i = Reactive power balance in node i (per unit Mvar)
- i, k = Node number
- n = Number of nodes
- V_i = Voltage magnitude in node i
- δ_i = Voltage angle of node i
- δ_k = Voltage angle of node k
- G_{ik} = Conductance between node i and k with negative sign
- G_{ii} = Sum of all conductances connected to node i
- B_{ik} = Susceptance between node i and k with negative sign
- B_{ii} = Sum of all susceptances connected to node i

The two equations above show the balance of each node in the AC network as the sum of the flow on branches and shunts connected to the node. The aim of these power flow equations is to determine the voltages (magnitude and angle) at all buses. If the voltages are known, it is possible to determine the power flows, losses, and currents.

Linearizing the power flow equations

Calculation of the PTDFs are based on standard DC linearization⁶ including the following simplifications:

- Node Voltage magnitude is 1 pu
- The resistance of the transmission lines are neglected
- The difference between the voltage angles are small

The power flow equations now become:

$$P_i = \sum_{k=1}^n B_{ik} (\delta_i - \delta_k) \quad (7)$$

⁶ See for example Schavemaker & van der Sluis (2009): "Electrical Power System Essentials", John Wiley & Sons Ltd, ISBN 978-0470-51027-8, Chapter 6.2.4.



$$Q_i = \sum_{k=1}^n -B_{ik} \quad (8)$$

Adding +1 to the diagonal elements representing the slack node, the voltage angles can be calculated as:

$$[\delta] = \begin{bmatrix} \delta_1 \\ \delta_2 \\ \delta_3 \end{bmatrix} = \begin{bmatrix} 1 + B_{12} + B_{13} & -B_{12} & -B_{13} \\ -B_{21} & B_{21} + B_{23} & -B_{23} \\ -B_{31} & -B_{32} & B_{31} + B_{32} \end{bmatrix}^{-1} \begin{bmatrix} P_1 \\ P_2 \\ P_3 \end{bmatrix} = [Zbus][P] \quad (9)$$

In a generic form, the PTDF can now be expressed as

$$PTDF_{ik,n} = B_{ik}(Zbus_{in} - Zbus_{kn}) \quad (10)$$

The $PTDF_{ik,n}$ is the sensitivity for line "ik" for power injection in bidding area n. By repeating this procedure for all nodes and all lines, the PTDF matrix can be computed. The matrix describes how the net balance of the nodes influences the power transfers on the lines.

From nodal PTDFs to bidding zone PTDFs using generation shift keys

Capacity allocation using the flow-based approach employs PTDFs that describe how a change in bidding zone net position would impact the grid constraints. The initial calculation of the PTDFs as shown above is performed on a nodal basis, and each node within a bidding zone has a unique influence on each grid constraint. The nodal PTDFs must therefore be aggregated into zone values to be used by the capacity allocation process.

The generation shift keys provide weights to each node in a bidding zone reflecting how much of the PTDF for the bidding zone shall be attributed to the node. Nodes with a large GSK value will form a larger part of the PTDF for the bidding zone, and vice versa for the nodes with a small GSK value. The GSKs therefore allow the aggregation of the nodal PTDFs into bidding zone PTDFs in a controlled manner.

The aggregation of nodal PTDF values into a PTDF value for the bidding zone can be formally expressed as shown in (11).

$$PTDF_{i,j}^A = \sum_{\forall \alpha} GSK^\alpha PTDF_{i,j}^\alpha, \quad \text{and} \quad \sum_{\forall \alpha} GSK^\alpha = 1 \quad (11)$$

$PTDF_{i,j}^A$ = Sensitivity of line i,j to injection in zone "A"

$PTDF_{i,j}^\alpha$ = Sensitivity of line i,j of injection in node "α"

GSK^α = Weight of node α on the PTDF of zone "A"



The calculation of Remaining Available Margins on critical network elements and Cuts

With the flow-based approach the PTDFs describe how the net position in each bidding zone impacts the flow on the grid constraints, while the Remaining Available Margin (RAM) provides the available capacity to be allocated. The RAM is calculated from the total technical margin of the grid constraints, taking into account the necessary deductions as shown in (12). The various deductions are described below.

$$RAM = F_{max} - FRM + RA - F'_{ref} \pm FAV \quad (12)$$

- F_{max}= Maximum allowed physical flow on the grid constraint
- F_{ref}'= Reference flow at zero net positions applying computed PTDFs
- FRM= Flow Reliability Margin
- FAV = Final Adjustment Value
- RA= Impact of remedial actions

F_{max} is the maximum allowed technical MW flow capacity of the grid constraint, either a CNE or a cut. The F_{max} value for a CNE is based on the technical limits on the maximum power that might be carried by transmission equipment due to heating effect of electricity current flowing through the equipment.

The calculation of the F_{max} for cuts consists of two parts, load flow and dynamic analysis, taking into account voltages and system stability limits as described in Figure 8-3. As long as no European CGMs that allow for dynamic simulations with sufficient quality are available, offline dynamic simulations applying Nordic CGMs are performed.

FRM is the flow reliability margin, which is intended to cover the uncertainty between the forecasted flow and the realized flow in real time. The methodology for calculating the FRM is described in section 8.1.

RA includes information of the availability of remedial actions (non-costly and costly), which would increase the RAM if not already included in the calculation of F_{max}.

F_{ref}' is the reference flow of the grid constraint when all bidding zones have a zero net position, as calculated by the PTDFs (shown in equation (13)). As such, F_{ref}' represents the loop flows resulting from internal trades between generators and consumers inside the same bidding zone. F_{ref}' can both be positive (will subtract from the RAM) or negative (will add to the RAM).

F_{ref} is the forecasted flow on the grid constraint, NP^{BC} is a vector of the forecasted bidding zone net positions, and PTDF is the vector of PTDF values for this grid constraint. In order for the linearized flow, to act as accurate as possible compared to the real flow, the linearization is done at F_{ref}. Thus, the linearized grid flow described by the PTDF will be the tangent to the real flow in this point, as illustrated in Figure 6-1. As such, opposed to CNTC, the FB design does not distinguish between transit flows or "other flows". All flows (besides internal loop flows) are monitored.

$$F_{ref}' = F_{ref} - PTDF \cdot NP^{BC} \quad (13)$$

The relation between the net position, flow and RAM is illustrated in Figure 6-1.



Finally, RAM may be adjusted by applying a final adjustment value (FAV) to be used to take into account relevant information such as last minute update of temperature or wind forecasts, which would increase the RAM and is not included in other RAM terms. This FAV may receive a non-zero value in the validation stage (i.e. during the validation of capacity calculation results). Important in this application is that a TSO applying FAV is transparent towards CCC and other TSOs about the information applied in FAV.

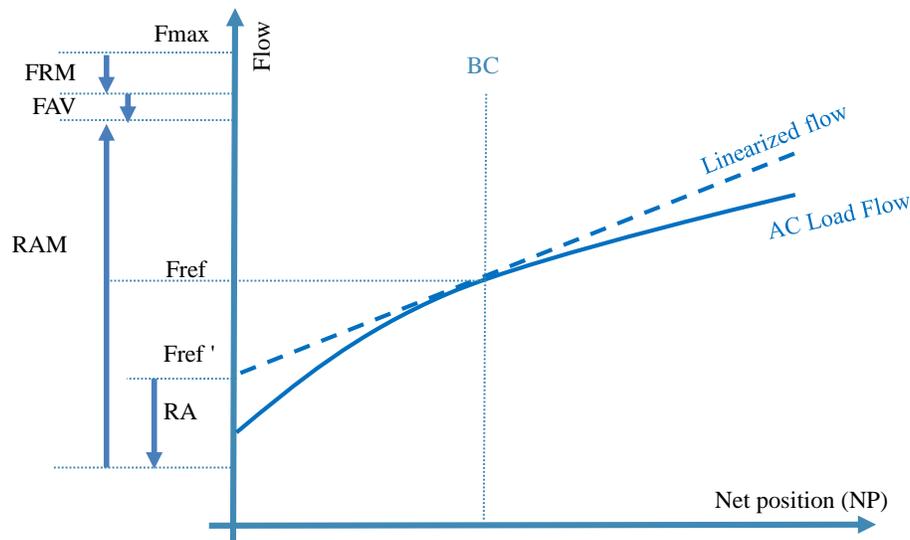


Figure 6-1 Relation between flow, net position and RAM

Negative available margins on critical network elements

In some cases the RAM for a grid constraint can be negative. This would imply that the market situation where all bidding zones have a net position of zero is not a feasible market outcome, and that the capacity allocation process is required to relieve the initial grid constraints. But the market outcome where all bidding zones have a net position of zero remains highly unlikely in the Nordic power system (there were no such market outcomes in 2016), so this may not represent a real possibility or downside to negative RAMs.

The option for eliminating negative RAMs, by increasing the value to at least zero would represent a real risk of grid overloads as this increase would also allow for overloads in more probable market outcomes close to the forecasted net positions. Increasing the RAM would also not allow the market coupling process to determine the most efficient way to relieve a possible congestion.

The flow-based approach will therefore allow for negative RAMs, to the extent that the capacity allocation process will allow such negative values.



6.1.3 Rules for avoiding undue discrimination between internal and cross-zonal exchanges

This section covers the requirement in CACM Regulation Article 21(1)(b)(ii), that the proposal for capacity calculation methodology provides:

“Rules for avoiding undue discrimination between internal and cross-zonal exchanges to ensure compliance with point 1.7 of Annex I to Regulation (EC) No 714/2009;”

Point 1.7 of Annex I to Regulation (EC) No 714/2009 reads:

“When defining appropriate network areas in and between which congestion management is to apply, TSOs shall be guided by the principles of cost-effectiveness and minimisation of negative impacts on the internal market in electricity. Specifically, TSOs shall not limit interconnection capacity in order to solve congestion inside their own control area, save for the abovementioned reasons and reasons of operational security (1). If such a situation occurs, this shall be described and transparently presented by the TSOs to all the system users. Such a situation shall be tolerated only until a long-term solution is found. The methodology and projects for achieving the long-term solution shall be described and transparently presented by the TSOs to all the system users.”

(1) Operational security means ‘keeping the transmission system within agreed security limits’.

The rules are provided in the next subsections.

Periodic review of grid constraints

The TSOs will periodically review the grid constraints applied in the market coupling that are found to be limiting the market exchange of power, to determine if including the grid constraints fulfills the requirements in CACM Regulation Article 21(1)(b)(ii).

Bidding zone delimitation

If the same internal grid constraint is limiting cross-zonal exchanges recurrently, it shall be studied whether dividing the bidding zone where the grid constraint is located into several bidding zones would bring benefits to the market. In addition to benefits also costs related to changing bidding zone delimitation should be evaluated. This kind of evaluation shall be done on a regular basis.

Selection criteria for grid constraints

To avoid undue discrimination between internal and cross-zonal exchanges, only those critical network elements or cuts that are significantly influenced by cross-border exchanges will be included in the capacity calculation, as described in Section 5.2.

This will ensure that internal critical network elements, which are not significantly impacted by cross border trades, will not limit cross-border trade.



Advanced hybrid coupling for direct-current (DC) interconnectors and interconnectors to other CCRs

An exchange determined by the allocation mechanism on an AC-border in a meshed system, will not be realized as a physical flow in the power grid. In a meshed AC grid, the flow chooses a path from A to B in accordance to the laws of physics (approximated by the PTDFs). Thus, the agreed volume being traded from zone A to zone B will be realized, but the agreed flow will fan out in the grid according to physics (See Figure 3-2).

An HVDC link, or a radial AC connection to an external CCR, on the other hand is fully controllable, and the trade determined by the allocation mechanism, will be the flows that the TSOs assign the link to transport. However, when the flow from an interconnector enters an AC area, for example when the flow on Skagerrak enters NO2, it will fan out in the AC grid according to physical laws. The only difference is that we always know exactly in which node the flow from the interconnector enters the system (the converter station).

Thus, the interconnector itself might be controllable and act as a physical representation of NTC, but it has the inherent challenge that when the flow enters the local AC grid, it utilizes grid capacity in the same manner as all other flows. This implies that capacity on grid components used by the flow coming from an interconnector, cannot be used by other flows at the same time. The interconnectors however, must coexist in some way with the AC system managed by a FB approach. This relation is referred to as "hybrid coupling" (between FB *and* NTC).

In the Nordic capacity calculation methodology, the relation between the interconnectors and AC grid will be managed by what is referred to as an "advanced hybrid coupling" approach. This goes for all cross-border exchanges for HVDC interconnectors in the Nordics, and for the radial connection between bidding zone DK1 and Germany. Within this approach, the converter stations of the HVDC link, and the "landing point" of the radial AC interconnector are implemented as 'virtual' bidding zones in the FB system.

The virtual area is an "empty" bidding zone without order books. PTDF factors, reflecting how the flow from the HVDC link will fan out in AC grid, are calculated for the virtual bidding zone and implemented in the PTDF matrix like other PTDF factors. Thus, no priority is given to the flows from the interconnectors in the AC grid, and these flows will compete for the capacity in the AC grid like exchanges from any other Nordic bidding zones (SE1, SE2, NO1, FI, and so on).

Due to the advanced hybrid coupling, all bidding zones, also external areas not being part of the Nordic capacity calculation region, will have equal access to the capacity in the Nordic AC grid, thereby avoiding undue discrimination.

The alternative way of managing the DC and AC coexistence is the "standard hybrid coupling" approach. In this approach, the capacity needed to support the flows entering the AC grid coming from an interconnector is reserved for the interconnector and not provided for the market at all. Thus, within the "standard hybrid coupling" approach, the cross-border flow from the link is prioritized in the AC grid, a



feature that would mask the unique influence from the HVDC cross-border flow, increase uncertainty, reduce economic efficiency, and make the cross-border exchanges liable to undue discrimination.

Figure 6-2 illustrates the principle of "advanced hybrid coupling" where the terminal points of the direct-current interconnectors between the Nordic synchronous area and the Continental synchronous area (including the DK1 bidding zone) are placed in virtual bidding zones. This will ensure that the impact from the cross-border flow on the grid constraint is as precise as possible. DK1 is a separate flow-based region since it belongs to the Continental synchronous area. The virtual bidding zones are DK1_GE, DK1_Skagerrak, DK1_KontiSkan, DK1_Storebælt, NO2_Skagerrak, NO2_NorNed, SE3_KontiSkan, DK2_Storebælt, DK2_Kontek, and SE4_Baltic; the normal bidding zones are DK1, DK2, NO1, NO2, NO3, NO4, SE1, SE2, SE3, SE4, Germany, and the Netherlands.

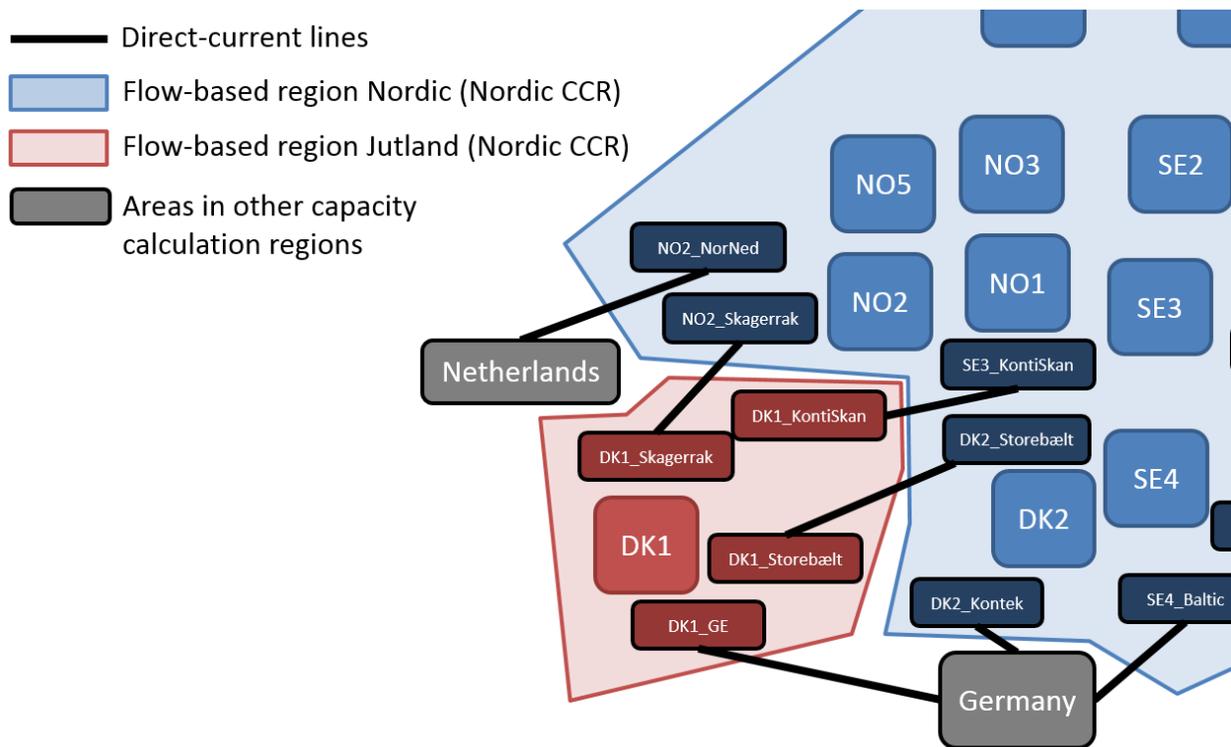


Figure 6-2 Illustration of the Advanced Hybrid Coupling approach in the HVDC modelling



6.1.4 Rules for taking into account previously allocated capacity

The CACM Regulation does not indicate for which purposes grid capacity can be previously allocated⁷, only that previously allocated cross-zonal capacity should be taken into account in capacity calculation. The purpose of reservations are however stated in the draft Electricity Balancing Regulation and Forward Capacity Allocation Regulation respectively. This section explains how previously allocated (or reserved capacity) is taken into account in the proposed CCM. Grid capacity can be allocated ex ante of day-ahead capacity calculation and allocation, reducing the available day ahead capacity for two reasons:

- Existence of physical transmission right (PTR) *and* nominated for use
- Cross-zonal exchange of ancillary services, cf. Article 22(2) of the CACM regulation.

The impact of previously allocated capacity gives reduced capacity for day ahead or intraday market.

In CNTC, and in NTC, reservation is reflected on the relevant bidding zone borders directly. This is, however, not possible in FB due to the formulation of grid constraints in the form of PTDFs and RAMs. Thus, a reservation in FB must relate directly to the relevant grid constraints influenced by a reservation.

In FB, a reservation must be specified by the areas of origin and consumption, and the MW target, i.e. the amount of MW that is previously allocated for PTRs or ancillary services. The necessary reservations on the relevant grid constraints is calculated by the use of the PTDF matrix. The necessary reservations on each individual grid constraint, calculated by the PTDFs, will be subtracted from the RAM of each relevant grid constraint. The calculation is illustrated in the figure below:

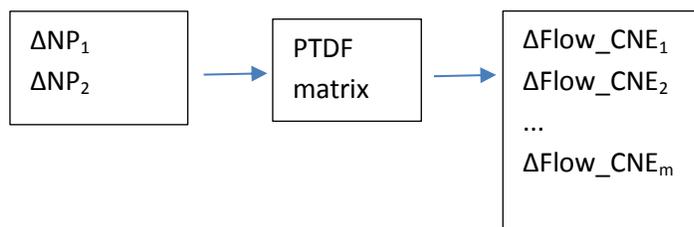


Figure 6-3 Additional margin ΔFlow needed for each grid constraint for reserving capacity

The required reservation is specified as a change in the net position in the two areas ΔNP_1 and ΔNP_2 . One is a buy volume, the other a sell volume. The net position changes are inserted in the PTDF matrix, and the resulting flows on the relevant grid constraints ($\Delta\text{Flow_CNE}_m$) are computed. This flow will be subtracted from the RAM of the grid constraints.

⁷ This is referred to as 'reservation' in the following text.



In addition to these requirements, it is necessary to reserve the allocated capacity for the realization of the day ahead market solution in the intraday capacities.

6.1.5 Rules on the adjustment of power flows on critical network elements or of cross-zonal capacity due to remedial actions

Whenever possible, remedial actions are considered during capacity calculation to increase the transmission capacity of grid constraints available to the market. Currently there are four types of RAs in use in the Nordics to enhance market capacity:

1. Re-dispatch (Special regulation)
2. Automatic tripping of generation, consumption or grid components in case of a fault (System protection schemes)
3. Changes to the grid topology to minimize the effect of a fault
4. Emergency power and run-back on DC connections

Initially, these measures are applied by the TSO during real-time operations to reduce overloads on particular grid constraints. Whenever measures 2-4 are known (or assumed) to be available during capacity calculation, the CCC will use that information to increase the market capacity on grid constraints. Re-dispatch is used to manage grid constraints only when market limitations are a less efficient option.

There are two issues for the TSOs to consider when providing RAs. (1) Which influence a particular RA will have on a particular grid constraint, and (2) the availability of that particular RA.

- (1) The influence of a particular RA on a particular grid constraint is either pre-calculated by the use of an updated grid model/common grid model to provide information to how much extra market capacity can be provided on that particular grid constraint, or the calculation is included as an internal part of the CC. One particular RA might influence several grid constraints simultaneously
- (2) The availability of each RA is not known with certainty at the time of capacity calculation. Thus a preliminary set of RAs will be considered in the first phase of calculation, and may be fine-tuned in the final stages of capacity calculation

Remedial actions might be applied on all types of grid constraints, both internal and external. On some occasions, the application of RAs will remove an internal constraint completely, on other occasions significantly increase the capacity provided for the market. When the application of RAs are depleted, any further increase in capacity will compromise operational security.

6.1.6 Rules for sharing the power flow capabilities of critical network elements among different capacity calculation regions

These are the same as the "Rules for avoiding undue discrimination between internal and cross-zonal exchanges" in section 6.1.3, and thus not repeated here.



6.2 Selection of relevant grid constraints for the market domain

According to the CACM Regulation Article 29.3

"When calculating cross-zonal capacity, each coordinated capacity calculator shall (b) ignore those critical network elements that are not significantly influenced by the changes in bidding zone net positions according to the methodology set out in Article 21"

On any given time, there are numerous constraints in the electrical grid that need to be managed in order to ensure safe operation. Some of these constraints are influenced by changes in bidding zones net positions (as in cross-border trades), and some are not. Due to the zonal market structure (in contrast to a nodal pricing structure), only bidding zone net positions (and prices) are decided by the power market. Thus, capacity calculation cannot consider those constraints that do not respond to changes in bidding zones net positions.

One can say there are two broad categories of grid constraints, those influenced by cross border exchanges, and those not influenced by cross border exchanges. Only the first category are relevant candidates for entering the capacity calculation for the day ahead and intraday market.

Within the category of grid constraints influenced by cross border trades however, some are highly influenced, and some are hardly influenced by cross border trade. Thus, if the influence on a grid constraint from cross border trade are close to, but not actually zero, it is relevant to ask whether it is efficiently managed by the market or not.

As an example, one could imagine a grid constraint that is influenced by a cross border trade by 1%. This means that a cross border exchange of 100 MW, will induce a flow of 1 MW on that constraint. The implication of this relation will be that in order for the market to reduce the flow on that grid constraint by 1 MW, the cross border trade will have to be reduced by 100 MW. Leaving these "hardly influenced" grid constraints to be managed by the market, will severely reduce the capacities that can be provided for the market.

The CACM Regulation does require the TSOs to remove "not significantly influenced grid constraints" without defining what would constitute a "significant influence", which is the topic of the rest of this section. But as a point of departure, it shall be realized that each grid constraint under consideration normally will be influenced by several different cross border exchanges at the same time. Thus, when referring to the level of influence on a grid constraint, we are referring to the particular cross border trade with the highest influence on that particular grid constraint.

We define:

Not significantly influenced grid constraints are those with a maximum influence from any cross border trade below a certain threshold (that will be evaluated at least once a year).



Calculation of the maximum influence on grid constraints from cross border exchange

The influence of a grid constraint by cross border exchanges might be calculated by the use of PTDFs. A "normal" PTDF, described so far in the document, prescribes the change of flow on a grid constraint when injecting power in a particular bidding zone with the assumption that the injection is absorbed in "the slack node". Thus, to find the influence on any grid constraint from any cross border exchange, we may trace the route between the two bidding zones by PTDFs. For example if we like to find the influence on constraint "n" by a cross border trade from zone "A" to zone "B", we can calculate:

$$PTDF_n^{AB} = PTDF_n^A - PTDF_n^B \quad (14)$$

$PTDF_n^{AB}$ = The influence of cross border trade from zone "A" to zone "B" on constraint "n"

$PTDF_n^A$ = The "normal" PTDF of zone "A" on constraint "n"

$PTDF_n^B$ = The "normal" PTDF of zone "B" on constraint "n"

Generally, we would like to find the largest $PTDF_n^{ij}$ between any bidding zones (i,j) on each grid constraint "n" and evaluate if this is above the chosen threshold. This might be found directly by calculating:

$$Max PTDF_n^{ij} = PTDF_{n,Max} - PTDF_{n,Min} \quad (15)$$

If this value is below the threshold, the grid constraint is removed from the PTDF matrix.

There are no theoretical sound guidance for defining a threshold value. Thus, we will initially start by a value of 15% and monitor this over time to find a suitable threshold. The threshold is defined as the share of power from a given exchange that "crosses" a particular CNE. If 100MW is exchanged between two bidding zones but less than 15MW "crosses" a particular CNE located anywhere in the Nordic power system, it is not included in the capacity calculation. The threshold value might also change from location to location, between TSO control areas and over time.

Exceptions

There might be instances where a grid constraint has a low cross border PTDF, but where there are no good alternative ways of managing the congestion. In such instances, one should be allowed an exemption to the general rule of the minimum threshold value. Such cases are few and by requiring the TSO to give an argument as to why the grid constraint in question needs to be part of the market clearing, it creates transparency as to what is a transmission issue.



7 ID Capacity calculation methodology

The CNTC methodology is proposed for intraday as a temporary solution until the XBID solution is able to facilitate FB. This section covers the proposal for both the long term solution of FB and the interim solution with CNTC.

Dedicated CGMs containing the latest available information are being applied when calculating capacities for intraday time frame. Thus, capacities released for intraday market are not just left-over capacities from day-ahead time frame, but capacities are recalculated for intraday time frame. It is expected that the uncertainty for the intraday time frame is smaller than for the day-ahead time frame, as better forecasts are available and less assumptions need to be made when getting closer to the operational hour. Thus, the assumption is that the reliability margin reserved for the day-ahead timeframe can partly be released in the intraday time-frame.

7.1 Description of the FB capacity calculation approach

7.1.1 Mathematical description of the capacity calculation approach

The capacity calculation process is starting with the physical electricity grid and its limitations, and ends with the delivery of linear constraints to the market coupling function. The capacity calculation process for the ID market is the same as for the DA market. This is described in chapter 6.1.1, and not repeated here.

7.1.2 Mathematical description of the calculation of power transfer distribution factors and of the calculation of available margins on critical network elements

The mathematical description of the calculation of PTFs and RAMs for the ID market is the same for the ID and the DA market. This is described in chapter 6.1.2, and not repeated here.

However, one important difference in the ID calculation is the use of a dedicated ID CGM rather than the DA CGM for this particular purpose. It is also worth noting that a particular FRM calculation will be maintained for the ID timeframe. It is expected that the ID FRMs will be smaller than the DA FRMs due to reduced uncertainty while moving closer to the operational hour. This will provide for some extra available capacity (RAM) in the ID timeframe.

7.1.3 Rules for avoiding undue discrimination between internal and cross-zonal exchanges

The rules for avoiding undue discrimination between internal and cross-zonal exchanges are the same for ID and DA. These are described in chapter 6.1.3, and not repeated here.



7.1.4 Rules for taking into account previously allocated capacity

The rules for taking into account previously allocated capacity are the same for ID and DA. These are described in chapter 6.1.4, and not repeated here. However, for the intraday coupling, this also includes the flows already allocated by the day-ahead coupling.

7.1.5 Rules on the adjustment of power flows on critical network elements or of cross-zonal capacity due to remedial actions

The rules for adjusting power flow on critical network elements and Cuts are the same for the ID and the DA timeframe. This is described in chapter 6.1.5, and not repeated here.

7.1.6 Rules for sharing the power flow capabilities of critical network elements among different capacity calculation regions

The rules for sharing the power flow capabilities of critical network elements and Cuts among different CCRs are the same for the ID and the DA timeframe. This is described in chapter 6.1.6, and not repeated here.

7.2 Detailed description of the CNTC capacity calculation approach

This chapter describes the CNTC approach for the intraday time frame according to the Art.21(1) (b) of the CACM Regulation.

The CNTC approach is built on the current NTC approach, aiming to develop the current NTC approach further in order to fulfill the requirements laid down in the CACM Regulation. The main difference between the current NTC and CNTC is that CGMs are applied in the CNTC calculations. CNTC calculations are using basic AC load flow and dynamic simulations as a point of departure. In CNTC, the cross-zonal capacities on bidding zone borders are calculated border by border to both directions using CGMs. The following inputs are needed for the calculations:

- CGMs;
- GSKs;
- Contingencies;
- Operational security limits.

7.2.1 Mathematical description of the capacity calculation approach

Cross-zonal capacity (CZC) which can be provided to the market is calculated as follows:

$CZC = TTC$ (maximum power exchange adjusted by applying remedial actions, rules for undue discrimination, and rules for sharing power flow capabilities among different bidding zone borders) - AAC - TRM,



where TTC refers to total transmission capacity, AAC refers to already allocated capacity and TRM refers to transmission reliability margin.

AC load flow analysis forms the basis for CNTC approach. Inputs to the capacity calculation are a common grid model (CGM), which presents the forecasted state of the power system, generation shift keys (GSKs), contingencies, and operational security limits. Load flow analysis reveals the voltages in different nodes (magnitude and angle), power flows (active and reactive power), and losses on different lines. Voltages and power flows in the system can be calculated when load and generation in different nodes are known.

Active and reactive power flows in steady state can be calculated using the following equation:

$$\underline{S}_i = P_i + jQ_i = (P_{Gi} - P_{Li} - P_{Ti}) + j(Q_{Gi} - Q_{Li} - Q_{Ti}) \quad (16)$$

\underline{S}_i is the net apparent power coming to node i

P_i is the net active power coming to node i

Q_i is the net reactive power coming to node i

P_{Gi} is the active power coming to node i from the connected generators

P_{Li} is the active power from node i to the connected load

P_{Ti} is the active power going from node i to the connected transmission lines

Q_{Gi} is the reactive power coming to node i from the connected generators

Q_{Li} is the reactive power from node i to the connected load

Q_{Ti} is the reactive power going from node i to the connected transmission lines

Background on the power flow equations is presented in more detail in Annex IV.

TTC is the maximum allowed power exchange of active power between adjoining bidding zones respecting N-1 criteria and operational security limits taking into account remedial actions, rules for undue discrimination and rules for efficiently sharing the power flow capabilities of critical network elements among different bidding zone borders. Rules for avoiding undue discrimination, rules for taking into account previously allocated capacity (AAC), rules for taking into account remedial actions, rules for calculating cross-zonal capacity given to the market, as well as the capacity sharing rules are discussed in more detail in the following sections.

7.2.2 Rules for avoiding undue discrimination between internal and cross-zonal exchanges

Internal grid constraints are monitored in the capacity calculation process. If internal grid constraints are limiting cross-zonal exchanges, analysis shall be performed to determine if including the grid constraints



fulfill the requirements in CACM Regulation Article 21(1)(b)(ii) (e.g. cost of countertrading compared to the loss of socio-economic welfare due to the limitation in cross-zonal capacity caused by the internal grid constraint shall be studied). If the same internal grid constraint is limiting cross-zonal exchanges recurrently, it shall be studied whether dividing the bidding zone where the grid constraint is located into several bidding zones would bring benefits to the market. In addition to benefits also costs related to changing bidding zone delimitation should be evaluated. This kind of evaluation shall be done on a regular basis.

7.2.3 Rules for taking into account previously allocated capacity

Cross-zonal capacities are reduced, where appropriate, by the amount of previously allocated capacities. In case of the intraday timeframe, the already allocated capacities for the day-ahead market shall be taken into account by reducing the cross-zonal capacity accordingly. In case already allocated capacity is bigger than CNTC capacity, zero capacity (0 MW) shall be provided the market, and RAs used to ensure operational security.

7.2.4 Rules on the adjustment of power flows on critical network elements or of cross-zonal capacity due to remedial actions

Remedial actions are taken into account as a part of the capacity calculation. After calculating the maximum exchange between bidding zones without remedial actions, necessary adjustments related to remedial actions are done in the common grid model, and the calculation is continued until the maximum cross-zonal exchange - taking into account remedial actions - is found.

7.2.5 Rules for calculating cross-zonal capacity, including the rules for efficiently sharing the power flow capabilities of critical network elements among different bidding zone borders

CNTC approach shall, in accordance with CACM Regulation Art. 29(8):

- a) use common grid model, generation shift keys and contingences to calculate maximum power exchange on bidding zone borders, which shall equal the maximum calculated exchange between two bidding zones on either side of the bidding zone border respecting operational security limits;
- b) adjust maximum power exchange using remedial actions taken into account in capacity calculation;
- c) adjust maximum power exchange, applying rules for avoiding undue discrimination between internal and cross-zonal exchanges;
- d) apply the rules for efficiently sharing the power flow capabilities of different critical network elements among different bidding zone borders;



- e) calculate cross-zonal capacity, which shall equal to maximum power exchange adjusted according to b), c), and d), and taking into account reliability margin and previously allocated cross-zonal capacity.

Point a)

The calculation of the maximum power exchange on a bidding zone border consists of load flow analysis and, where appropriate, dynamic analysis. As long as there are no European CGMs that allow for dynamic simulations, offline dynamic simulations applying Nordic CGMs are performed and pre-calculated dynamic limits in MW are included in the European CGMs.

The calculation of maximum power exchanges is an iterative process, where the starting point is the CGM for the studied hour (i.e. the CGM includes the forecasted state of the power system). When calculating the maximum exchange, generation on both sides of the studied borders is scaled stepwise according to the GSKs defined, in order to increase the flow on the studied bidding zone border.

The calculation of the maximum power exchanges on bidding zone borders consist of contingency analyses taking into account relevant operational security limits. Generation on both sides of the studied borders is scaled stepwise in order to increase the flow on the studied bidding zone border. After each step (i.e. after each increase in power exchange), contingency analysis (N-1 criteria) is performed and it is checked that operational security limits are not violated. The flow between the zones can be increased as long as there are no violations of the operational security limits. The analysis is completed, when the maximum power exchange, that still respects operational security limits, is found. Dynamic simulations are performed, where appropriate, in order to take into account dynamic limits and to ensure operational security.

Point b) and c)

The maximum power exchange is adjusted by using remedial actions and by applying rules for undue discrimination between internal and cross-zonal exchanges. Remedial actions are taken into account as it is described in section 7.2.4. Rules for avoiding undue discrimination are described in section 7.2.2.

Point d)

Sharing rules are needed in CNTC for interdependent bidding zone borders, in order to take into account the deviations between market flows and physical flows and to share capacities efficiently among the different bidding zone borders. Zone-to-zone PTDF matrices can be used to evaluate for which borders sharing rules are needed and the need for sharing rules shall be re-evaluated on a regular basis (e.g. once a year). As a starting point, the current sharing rules shall be applied in CNTC. Current sharing rules are described in "Principles for determining the transfer capacities in the Nordic market" document⁸.

⁸ <https://www.nordpoolspot.com/globalassets/download-center/tso/principles-for-determining-the-transfer-capacities.pdf>



Point e)

Finally, the reliability margin and the previously-allocated cross-zonal capacity are taken into account. It means that cross-zonal capacities are reduced by the amount of reliability margin as described in section 8.1, and previously allocated capacity as described in section 7.2.3.

7.2.6 Rules for sharing the power flow capabilities of critical network elements among different capacity calculation regions

Bidding zones in neighboring capacity calculation regions (CCR Baltic, CCR Hansa) that are connected to bidding zones in CCR Nordic shall be taken into account in the capacity calculation in the Nordic CCR. Capacities for interconnections going out of CCR Nordic shall also be calculated in the Nordic CCR by using the CGMs, and be coordinated with the CCR Hansa and CCR Baltic. If there is a difference in the capacities calculated in the different CCRs (e.g. an internal congestion limits the capacity for the interconnector), the lower value shall be used.

7.3 Frequency of the ID capacity calculation

The frequency of the reassessment of intraday capacity is dependent on the availability of input data relevant for capacity calculation, as well as any events impacting the capacity on the cross-zonal lines. Reassessment of intraday capacity shall be done at the frequency the CGM for the intraday timeframe is made available in accordance with the CGM methodology developed in accordance with Article 17 of the CACM Regulation and in case of a fault in the power system. The latest available CGM is applied in the reassessment of cross-zonal capacities. Due to the early intraday gate opening time in CCR Nordic, gate opening capacities for the intraday timeframe are calculated using D-2 CGMs, and reassessment of intraday capacities will take place as soon as D-1 CGMs are available.



8 Input parameters to the capacity calculation

This section presents the proposal for the input parameters in line with the requirement in CACM Regulation article 21.1(a) and 22 to 25.

8.1 Reliability Margin (RM)

One fundamental element in managing uncertainty in capacity calculation is the reliability margin (RM), more specifically Flow Reliability Margin (FRM) for a FB approach and Transmission Reliability Margin (TRM) for a CNTC approach. The RM is defined in Article 2 in CACM Regulation as: ‘*reliability margin*’ means the reduction of cross-zonal capacity to cover the uncertainties within capacity calculation. Due to uncertainties, the power system operator cannot fully predict what power flow will be realized on each grid constraint, or cross-zonal border for a certain hour day D given the information available at D-2 or intraday. There will always be prediction errors. The uncertainty originates from the ex-ante capacity calculation, and boils down to market-, model- and calculation method-uncertainties. The flow may be larger or smaller than anticipated, and if the flow turns out to be larger, there may be a risk for an overload which needs to be mitigated by the TSO. In order to reduce the risk of physical overloads, a part of the capacity on each grid constraint or cross-zonal border will be retained from the market as RM, reducing the RAM or cross-zonal capacity provided to the market to facilitate cross-border trading.

The RM value is normally defined in MW, but can also be presented as a percentage of the grid constraints or cross-zonal capacity's maximum limit. The value is individually quantified for each grid constraint and cross-zonal border and is based on a probability distribution of the prediction error of the flow.

The outline of this section is as follows. First a general description of the RM method is presented, describing the overall methodology. This is followed by a more thorough description of the actual method implementation. The two following sections describe the harmonized principles for the method and the uncertainties taken into account. Finally, the implementation of FRM in FB, and TRM in CNTC, is described and the update periodicity is defined.

8.1.1 Proposed RM methodology

CACM Regulation Article 22, “Reliability margin methodology”, paragraph 1 states that:

“[...] The methodology to determine the reliability margin shall consist of two steps. First, the relevant TSOs shall estimate the probability distribution of deviations between the expected power flows at the time of the capacity calculation and realised power flows in real time. Second, the reliability margin shall be calculated by deriving a value from the probability distribution.”

The RM method for the FB approach and CNTC approach is similar, the only difference being that in FB the FRM is calculated for grid constraints and in CNTC the TRM is calculated for cross-zonal capacities.



The two steps in the requirement form the basis for the proposed RM method. Figure 8-1 shows a general overview of the proposed methodology, which applies both for the CNEs, cuts, and cross-zonal borders. Cuts are introduced in the Nordics in order to manage voltage or dynamic stability limits. A "cut" is a flow limit spanning several lines or other grid components which is not possible to manage in a "Critical Branch / Critical Outage" setup.

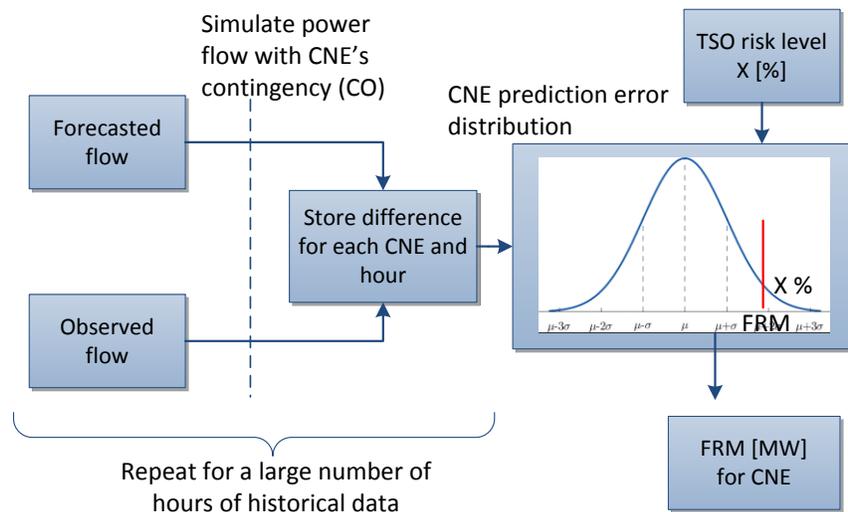


Figure 8-1. A schematic overview of the proposed RM methodology with its two steps; first a probability distribution is established based on historical data, then the RM value is derived from this distribution based on the set risk level. The figure shows how the prediction error probability distribution is deduced for the grid constraint, given a power flow simulation with the contingency activated for the observed and forecasted system state. The same fundamental technique applies for the cross-zonal borders with the exception that these do normally not include a contingency in its definition.

In the first step a probability distribution of the deviation between the forecasted and realized (observed) power flows is determined for each grid constraint or cross-zonal border, based on a large number of historical snapshots⁹ of the CGM for different hours. The grid constraint flows are calculated with a power flow simulation with the contingency for the grid constraint tripped¹⁰. The AC load flow calculation method is normally used, with the DC load flow method as a fallback in case of non-convergence. A large number of observed differences (in MW) form the prediction error distribution for the grid constraint or cross-zonal border.¹¹ The prediction error data is then fitted to a statistical

⁹ A snapshot is like a photo of a TSO's transmission system state, showing the voltages, currents, and power flows in the grid at the time of taking the photo.

¹⁰ Hereby, the difference in flows for the forecasted and observed flow for the CNE is calculated for the "N-1" grid state where this is applicable for the CNE. For CNEs or cross-zonal cuts with no contingency included, the forecasted and observed power flows are calculated for the intact grid (N grid state).

¹¹ Note that e.g. a line monitored with five CNEs, each with different contingencies, will have five different prediction error distributions and FRM values.



distribution that minimizes the model error. This can be the normal distribution or any other suitable distribution.

In the second step of the method, the RM value is calculated by deriving a value from the probability distribution based on the TSOs risk level value [%]. The risk level is here defined as the area (cumulative probability) right of the RM value in the prediction error probability distribution.¹² With a risk level of X %, the likelihood of having a prediction error greater than the RM value is X %, based on the historical observations for the grid constraint or cross-zonal border.¹³ A low risk level results in high RMs and vice versa. A TSO may use different risk levels for different grid constraints and cross-zonal borders.

As an initial value, the TSOs have agreed to use a 95% risk level.

With the above proposal the requirements in paragraph 1, Article 22 in CACM Regulation are fulfilled.

8.1.2 Principles for calculating the error distribution and the uncertainties

The principles for calculating the probability distribution should be described, together with the uncertainties taken into account by the methodology, as defined in paragraph 2 in Article 22 in CACM Regulation:

“The methodology to determine the reliability margin shall set out the principles for calculating the probability distribution of the deviations between the expected power flows at the time of the capacity calculation and realised power flows in real time, and specify the uncertainties to be taken into account in the calculation. To determine those uncertainties, the methodology shall in particular take into account: (a) unintended deviations of physical electricity flows within a market time unit caused by the adjustment of electricity flows within and between control areas, to maintain a constant frequency; (b) uncertainties which could affect capacity calculation and which could occur between the capacity calculation time- frame and real time, for the market time unit being considered.”

This subsection describes the principles for establishing the probability distribution and the uncertainties that are taken into account.

As previously shown in Figure 8-1, the basic idea behind the RM determination is to quantify the flow uncertainty by comparing the forecasted flow with the observed flow in the corresponding snapshot of the CGM. Figure 8-2 shows a more detailed picture of the proposed method for deducing the distribution for each grid constraint and cross-zonal border. The forecasted flow in the base case is compared with the realized flow observed in a snapshot in the transmission system model. In order to

¹² The risk level can also be defined as 1.0 subtracted with the percentile at the RM value in the probability distribution.

¹³ See Figure 8-1. With a risk level of 10%, 90% of the cumulative probability (area) in the distribution is left of the FRM value.



The observed grid constraint and cross-zonal border flows include the unintended deviations caused by the inherent random system behavior. Imbalances and adjustments made by the TSO will to some extent be included both in the observed and forecasted flow and hence also be included in the RM given necessary large amount of historical data for the grid constraint or cross-zonal border flow probability distribution. However, in order improve the accuracy of the margin caused by the activation of the frequency control reserve (FCR) this margin is proposed to be modelled separately and then merged with the FRM. A detailed method description of the capacity reservation for FCR is not within the scope of this proposal, but in general the following approach is proposed. First the FCR power flow impact is deduced for each grid constraint and cross-zonal border for a large number of historical hours, forming an FCR distribution. This distribution is then combined with the prediction error distribution, from which the FRM then is selected as earlier described. If the FCR distribution is too complex to establish for the TSO, the maximum FCR impact is instead assessed, giving an absolute FCR margin for the grid constraint or cross-zonal border. The final margin is then set by the largest of the two; the FRM or the FCR margin.

With the above description the requirements in paragraph 2, Article 22 in CACM Regulation are considered to be fulfilled.

8.1.3 Common harmonized principles for deriving RM (TSO risk level)

The differences between the observations and predictions are stored in a database that allows the TSOs to make a statistical analysis on a significant amount of data. Based on a predefined risk level, the RM value can be computed from the prediction error distribution.

The TSO risk level determines how the RM is derived from the probability distribution. This is the proposed harmonized principle for all TSOs in the methodology, cf. requirement in paragraph 3:

“In the methodology to determine the reliability margin, TSOs shall also set out common harmonised principles for deriving the reliability margin from the probability distribution.”

Each TSO will individually determine a suitable risk level for their grid constraints and cross-zonal borders in the RM methodology. The challenge is to find a balanced risk level that suits the TSO’s system requirements. A too low level results in high RMs that constrain the market, whereas a too high level leads to small RMs that may jeopardize system security. With small RMs there is a higher need (and cost) to mitigate problems in operation with available remedial actions.

In the proposed method the risk level is determined by the TSO given the operational security limits, the system uncertainties and the available remedial actions in the system for specific grid constraints and cross-zonal borders. As an initial value, the TSOs have agreed to use a 95% risk level.

The uncertainties in the probability distribution are further described in the following section.

With the above description the requirements in paragraph 3, Article 22 in CACM Regulation are considered to be fulfilled.



8.1.4 RM in respect to operational security limits given uncertainty and remedial actions

As described earlier the RM for each grid constraint and cross-zonal border is determined based on the uncertainties for the timeframe between the forecast and the actual operation hour for which the agreed operational security limits shall be fulfilled. The prediction error is calculated based on the operational security limits (N-1 state) which give individual distributions for each grid constraint or cross-zonal border, providing lower uncertainties. This requirement is also further defined in paragraph 4 in Article 22 in CACM Regulation:

“On the basis of the methodology adopted in accordance with paragraph 1, TSOs shall determine the reliability margin respecting the operational security limits and taking into account uncertainties between the capacity calculation time-frame and real time, and the remedial actions available after capacity calculation.”

With the proposed method described in the previous sections the subsequent effects and uncertainties are covered by the RM values:

- Uncertainty in load forecast
- Uncertainty in generation forecasts (generation dispatch, wind prognosis, etc.)
- Assumptions inherent in the GSK strategy
- External trades to adjacent synchronous areas
- Application of a linear grid model (with the PTDFs), constant voltage profile and reactive power
- Unintentional flow deviations due to activation of frequency reserves (FCR and FRRa) is included in the methodology
- Topology changes due to e.g. unplanned line outages
- Internal trade in each bidding zone (i.e. working point of the linear model)
- mFRR activation
- Grid model errors, assumptions and simplifications.

Due to the complexity of modelling all types of remedial actions in the CGM model, the uncertainty of many of these are not included in the FRM. Instead this uncertainty is included individually in the grid constraint RA which is assigned for modelling remedial actions in the grid.

With the above description the requirements in paragraph 4, Article 22 in CACM Regulation are considered to be fulfilled.

8.1.5 Set the RM value for FB (FRM) or CNTC (TRM)

In the last paragraph of Article 22 the actual requirement for RM in the day-ahead and intraday market is stated for FB and CNTC.



“For each capacity calculation time-frame, the TSOs concerned shall determine the reliability margin for critical network elements, where the flow-based approach is applied, and for cross-zonal capacity, where the coordinated net transmission capacity approach is applied.”

In both CNTC and FB the probability distribution and TRM (for CNTC) and FRM (for FB) value is reported in a standardized data sheet for each cross-zonal border or grid constraints, and each TRM/FRM value is assessed before being implemented. Obvious model or measurement errors are filtered from the data set, but they need to be monitored and justified.¹⁴

In its base format the TRM/FRM is always defined and stored in its absolute value, in MW. It may then be converted to a percentage of the grid constraints Fmax in the FB approach or cross-zonal capacity in the CNTC approach for comparison.

8.1.6 RM update periodicity

The requirements on FRM update periodicity is specified in paragraph 4(b) in Article 27 in CACM Regulation:

“Using the latest available information, all TSOs shall regularly and at least once a year review and update: [...] (b) the probability distribution of the deviations between expected power flows at the time of capacity calculation and realized power flows in real time used for calculation of reliability margins; [...]”

In the proposed method, the RM calculation is performed on a regular basis in order to keep the RM updated as the system and market evolve. A re-calculation and revision will be initiated at least once a year.

8.2 Operational security limits, contingencies, and allocation constraints

According to the CACM Regulation Article 21.1(a) (ii), operational security limits, contingencies and allocation constraints are three features described as key ingredients in capacity calculation:

“the methodologies for determining operational security limits, contingencies relevant to capacity calculation and allocation constraints that may be applied in accordance with Article 23”.

The following text will continue to give more details as to how these issues enter into the actual capacity calculation process.

¹⁴ An obvious error can be a CGM model failure with abnormal net positions or CNE flows compared to historical data. E.g. if the NP is twice the highest recorded value ever this indicates a model failure that needs to be investigated.



8.2.1 Operational security limits

In the CACM Regulation Article 2 (7), operational security limits are defined as the acceptable operating boundaries for secure grid operation:

“operational security limits’ means the acceptable operating boundaries for secure grid operation such as thermal limits, voltage limits, short-circuit current limits, frequency and dynamic stability limits.”

Boundaries for secure grid operation are independent of whether the capacity calculation methodology is CNTC or FB.

Within the capacity calculation process, the acceptable operating boundaries for secure grid operation are based on thermal limits, voltage limits, short-circuit current limits, frequency and dynamic stability limits.

The list of operational security limits consists of limits applied currently in the operational security analysis. All operational security limits shall however be respected both during the normal operation and in application of the N-1 criterion when defining allowed power flows across the power system. The list of operational security limits may change in the future when the characteristics of the power system will change due to foreseen change towards greener energy system.

Thermal limits are limits on the maximum power carried by transmission equipment due to heating effect of electricity current flowing through these equipment, and depend on the physical structure of the equipment and the voltage level. Ambient conditions like temperature, wind and the duration of overload will influence the limit. Larger power flows may be allowed for a short period of time. Thermal limits define the maximum allowed power flow on the specific equipment, unless other more restricting limits (e.g. voltage or dynamic stability limits) exist.

Voltage limits for each substation and its equipment are defined in kVs. Both maximum and minimum limits for voltages are defined. The voltage limits are based on voltage ranges as defined in the connection network codes. Power flows across the power system have an effect on the voltages; increasing power flows decrease voltages. The minimum voltage limit defines for each operational situation the maximum allowed power flows in the grid to avoid too low voltages and the disconnection of the equipment by the protection systems.

Short-circuit current limits are defined for each substation and its equipment in kAs. Both minimum and maximum limits for short-circuit currents are defined. The minimum limit is important for selective operation of protection devices, so that faults can be timely and selectively cleared. The maximum limit is set to ensure that devices connected to the grid can withstand induced fault currents. These limits do not influence the allowed power flows in the AC grid, but are there to ensure the functioning of protection systems and that devices connected to the grid can withstand fault currents and that the probability of cascading faults beyond the N-1 criterion is minimized.



Frequency stability limits are based on frequency ranges set in the connection network codes and in the System Operation Guideline. Frequency stability limits are taken into account during dynamic stability studies to see if the limits would have affected the allowed power flows on the grid. It is foreseen that these limits will have more effect in the future system operation, due to changes in the generation mix.

Dynamic stability limits consist of voltage and rotor angle stability limits. For voltage stability studies, the voltage limits during the fault in the power system and after clearance of the fault shall be studied to define the allowed power flows within the power system, respecting the voltage limits. For rotor angle stability studies, the power flow and generator rotor angle oscillations are studied for each operational situation to define the allowed power flows within the power system with predefined damping coefficients for power and rotor angle oscillations. The magnitude of oscillations and their damping depends on the structure of the power system and the power flows across the power system.

The acceptable operating boundary for secure grid operation is a **Maximum flow on grid elements or sets of grid elements** (F_{max}), defined as a MW limit for maintaining the voltage and short circuit current level, frequency and dynamic stability within its limits. Figure 8-3 shows example how F_{max} will be defined.

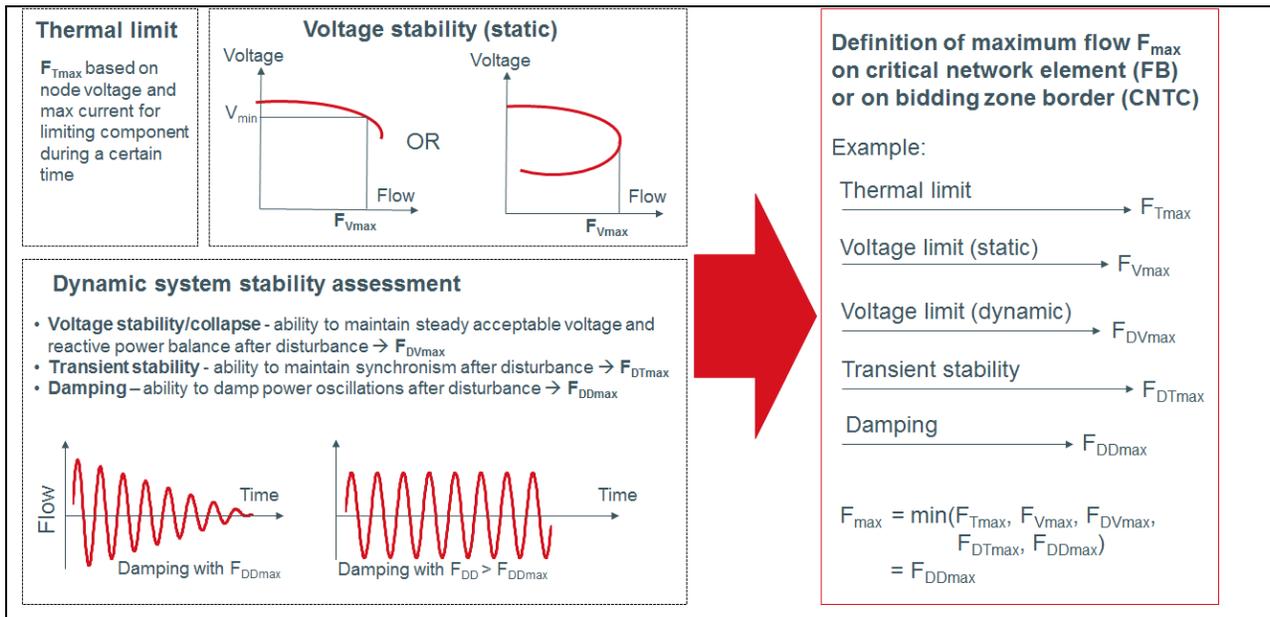


Figure 8-3: Definition of maximum flow (F_{max}) for grid elements

Generally, the F_{max} for Cuts are found by performing a network analyses on a relevant grid model, currently the TSOs local "Planning Grid Models" adjusted by the relevant grid topology, and considering



an N-1 situation. The CGM will be used when sufficient data quality and performance is secured within this model. Thermal limits are not considered in definition of the F_{\max} for Cuts. Thermal limits are implemented as Critical Network Elements with or without an associated contingency.

8.2.2 Contingencies

A contingency is commonly understood to be something that might possibly happen in the future that causes problems or makes further arrangements necessary. In the electricity system, contingencies are usually understood to be incidents in the shape of faults in the system that we would like to be able to manage without the end-user noticing. For this to be the case, a certain amount of redundancy must be built into the system design. If you can withstand one error without the loss of system functionality we term the design to be in line with the N-1 criterion. If you can have two simultaneous errors, without affecting the end-user it is a N-2 design. When doing capacity calculation, one normally does not model all possible contingencies, but a relevant set for the cross zonal trade is chosen. In this context, contingencies are grid constraints which satisfy the selection criteria described in section 5.2. These are grid components of the transmission system that are significantly influenced by cross zonal trade. It is the responsibility of the TSOs to specify which contingencies shall be considered by the CCC.

8.2.3 Allocation constraints

There are some trade restrictions that are not addressed by the abovementioned physical restrictions. These are termed allocation constraints and mentioned in CACM Regulation Article 23.3:

“If TSOs apply allocation constraints, they can only be determined using:

(a) constraints that are needed to maintain the transmission system within operational security limits and that cannot be transformed efficiently into maximum flows on critical network elements; or

(b) constraints intended to increase the economic surplus for single day-ahead or intraday coupling.”

Allocation constraints are defined in CACM Regulation Article 2 as:

“‘allocation constraints’ means the constraints to be respected during capacity allocation to maintain the transmission system within operational security limits and have not been translated into cross-zonal capacity or that are needed to increase the efficiency of capacity allocation.”

Allocation constraints are a way of efficiently describing restrictions in the electricity market that cannot be, or are poorly, defined by flows on CNEs. The allocation constraints will be provided by the TSOs to the CCC. There are a number of such cases, which include - but are not limited by - the following examples:



- The combined import or export from one bidding zone to several other neighboring zones must be limited to a threshold value.
- Maximum flow change on DC-links between MTUs (ramping restrictions).
- The implicit loss factors on DC-interconnectors

Current implementation in parallel simulations

- Operational security limits are currently 'external' inputs from the TSOs to the capacity calculation method
- Contingencies are defined by the TSOs to model grid restrictions in the transmission grid and subject to the selection criteria described in section 5.2.
- Allocation constraints are used both to handle ramping restrictions, and the total flow from several bidding zones into another.

8.3 Generation Shift Key (GSK)

The generation shift keys (GSK) define how a net position (NP) change in a bidding zone should be distributed to each generator unit and load point in the CGM. This data is essential in capacity calculation. To illustrate this, Figure 8-4 provides an example of the GSK for a small system with three bidding zones (A-C) each with five interconnected electric nodes (1-5) with load and generation.

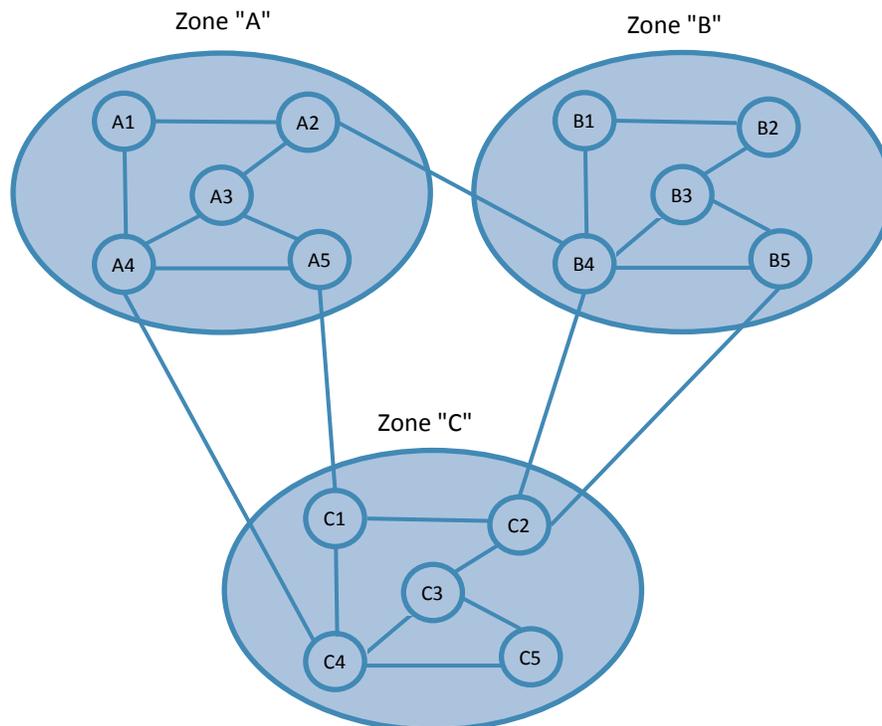


Figure 8-4 Illustrative example for GSK strategy



Figure 8-4 shows a small system to illustrate the GSK. Assume that for a specific hour only node A1 and A2 include generators that are sensitive to changes in the NP. Hence, one GSK strategy for zone A could be to distribute a NP change evenly to A1 and A2. If the NP in zone A increase with 1 MW then A1 and A2 are increased with 0.5 MW each, being close to zone B. Now assume that for the next system hour everything is exactly the same except that sensitive generators only are present in node A4 and A5, which now handle all NP changes. This calls for a different GSK strategy compared to the previous hour for the zone, i.e. A4 and A5 are increased with 0.5 MW, being closer to zone C. It is clear that, depending on the GSK strategy, there will be differences in power flows of the lines and since the PTDFs are calculated based on the marginal line flows given a NP change, the GSK will have an impact on the accuracy of the PTDFs.

The GSKs also provide the opposite transformation; how a nodal injection change affects the bidding zone net position. This information is essential when the zone-to-grid constraint PTDFs are calculated based on the node-to-grid constraint PTDFs.

Different GSK configurations will provide different PTDFs and hence influence the market domain and solution. A thoroughly worked out GSK strategy will improve the accuracy of capacity calculation and decrease the RM values.

When designing the GSK method, it is important to be aware that this is a linear approximation of a non-linear relation. No matter what shifts are imposed to the net positions by the market, the linear relation is assumed to hold. As generator limits cannot be considered by this approach it is important that the best available forecast is used for the CGM.

There are different shift keys related to generation and load (i.e. load shift keys, LSKs).¹⁵ In this context however, the general term generation shift keys (GSK) is generally used for both.

8.3.1 GSK methodology

Article 24, paragraph 1 in the CACM Regulation provides the requirements for a GSK methodology:

“The proposal for a common capacity calculation methodology shall include a proposal for a methodology to determine a common generation shift key for each bidding zone and scenario developed in accordance with Article 18.”

In the method proposal, eight different GSK strategies (1-8) plus one custom strategy (0), have been developed, each modelling different zone characteristics. The TSO may select one of the eight strategies for each zone, or provide a custom GSK with individual participation factors for each load and generator

¹⁵ In zones with little or no generation, the GSK strategy includes load shift keys for load points in the zone. A NP change in the zone is then handled by scaling these load points in the CGM.



unit in the CGM model. The custom GSK strategy is always used if this is defined for the hour; otherwise a predefined default strategy (1-8) is used for the zone.

In general, the GSK includes power plants and loads that are, based on historical data and experience, sensitive to market changes and flexible in changing the electrical power output. This mainly includes hydro, coal, oil, and gas units. Generators and loads that are likely to be shifted receive a high participation factor. Non-flexible units, such as e.g. nuclear, wind, solar or run-of-river, are added to an ignore-list and receive a participation factor of zero. These are not included at all in the shift and in the following description.

Table 8-1 shows the properties of the eight proposed GSK strategies 1-8 along with the custom GSK which here is denoted strategy 0. Each of the strategies may be applicable for a bidding zone, either during all hours for a year or for a single hour.

The participation factors are normalized per zone and then defined in a dimension-less unit. For example, one unit may have a participation factor corresponding to its installed capacity (MW), and normalized this factor may equal 0.03. This means that 3% of the total NP change is handled by the unit.

Different strategies may be optimal for different bidding zones, countries or hours. This is something that can be discovered during the ex-post analysis of the capacity calculation and allocation. Reasons why this could happen is for example that the generation technology mixture varies between bidding zones or that the geographical distribution of generation and generation technologies varies significantly between zones.



Table 8-1 GSK strategies in method proposal

Strategy number	GSK	LSK	Comment
0	k_g	k_l	Custom TSO GSK strategy with individual set of participating factors for each generator unit and load for the hour.
1	$\max\{P_g - P_{\min}, 0\}$	0	Generators participate relative to their margin to the generation minimum (MW) for the unit
2	$\max\{P_{\max} - P_g, 0\}$	0	Generators participate relative to their margin to the installed capacity (MW) for the unit
3	P_{\max}	0	Generators participate relative to their maximum (installed) capacity (MW)
4	1.0	0	Flat participation of all generators, independently of the size of the generator unit
5	P_g	0	Generators participate relative to their current power generation (MW)
6	P_g	P_l	Generators and loads participate relative to their current power generation or load (MW)
7	0	P_l	Loads participate relative to their power loading (MW)
8	0	1.0	Flat participation of all loads, independently of size of load

k_g : Participation factor [-] for generator g
 k_l : Participation factor [-] for load l
 P_g : Current active generation [MW] for generator g
 P_{\min} : Minimum active power generator output [MW] for generator g
 P_{\max} : Maximum active power generator output [MW] for generator g
 P_{load} : Current active power load for load l

With the above proposal the requirements in paragraph 1, Article 24 in the CACM Regulation are fulfilled.

8.3.2 Finding optimal GSK in forecast

Article 24, paragraph 2 in the CACM Regulation provides the requirements of the GSK forecast:



“The generation shift keys shall represent the best forecast of the relation of a change in the net position of a bidding zone to a specific change of generation or load in the common grid model. That forecast shall notably take into account the information from the generation and load data provision methodology.”

The TSOs provide the GSK to be used in the capacity calculation process for each zone and the time period for which it is valid. The TSO should aim to find a GSK that minimizes the prediction error between the forecasted and observed flows for all generator units and loads in each zone for a certain time span.

In order to test different GSK strategies a heuristic optimization method has been developed. The objective function is a weighted norm of all RMs, providing a quantitative value of the GSK quality. Based on a large historical data set (observed and forecasted CGM) it is possible to find the GSK set that minimizes the overall RM for the study period. Based on the results and on experience a default GSK strategy is selected for each zone.

With the above proposal the requirements in paragraph 2, Article 24 in the CACM Regulation are fulfilled.

8.4 Remedial Actions

The focal point of this text is not to elaborate on what remedial actions are, and how they are used, but on how they affect capacity calculation. See chapter 6.1.5 for an explanation of Remedial Actions in capacity calculation.

In the preamble of the CACM Regulation it is stated in (10) that:

“TSOs should use a common set of remedial actions such as countertrading or re-dispatching to deal with both internal and cross-zonal congestion. In order to facilitate more efficient capacity allocation and to avoid unnecessary curtailments of cross-border capacities, TSOs should coordinate the use of remedial actions in capacity calculation.”

In CACM Regulation Article 21 and Article 25 it is stated to include:

- In 21.1(a)(iv) - the methodology for determining remedial actions to be considered in capacity calculation. Whereas Article 25.1 defines this task to be the individual task of each TSO.
- In 21.1(b)(iv) - the rules on the adjustment of power flows on critical network elements or of cross-zonal capacity due to remedial actions.
- 25.2: Each TSO (...) shall coordinate with the other TSOs (...) the use of remedial actions to be taken into account in capacity calculation and their actual application in real time operation.
- 25.5: Each TSO shall take into account remedial actions without costs in capacity calculation.

Most of the remedial action responsibility lies with the TSOs but the outcome must be clearly described, coordinated and communicated. Only non-costly remedial actions are a prerequisite in the cross zonal



capacity calculation methodology, whereas the costly remedial actions are used according to the draft System Operation Guideline Article 20 to depend on *the time and resources needed for their activation*. When costly remedial actions are used however, one needs to be in line with CACM Regulation Article 74.5(b) to monitor their use. There is no systematic record today on the use of costly or non-costly remedial actions.

Remedial actions allow for an increase in RAM on grid constraints. This is not done by adjusting the operational security limit of the grid constraints, but by adding a Remedial Actions (RA) in the calculation of the RAM. It is shown in equation (12) and Figure 6-1 that RA will increase the RAM. The RA element can be used to account for the effect of remedial actions to adjust the capacity. It also provides a transparent way of doing so. Each TSO is responsible for the remedial actions installed in their bidding zones and for setting the correct RA values, reflecting the impact of the remedial actions, on the relevant grid constraints.

RAs such as HVDC runback, and trip of generation or load, depend on the dispatch, which is not known prior to the capacity calculation. Considering such RAs may introduce a risk that the capacity is over estimated.



9 Methodology for the validation of cross-zonal capacity

The TSOs are legally responsible for the cross-zonal capacities and they have to validate the calculated cross-zonal capacities before the coordinated capacity calculator can send the capacities for allocation. This section describes the methodology for validating cross-zonal capacity in line with Article 21(c) and 26 of the CACM Regulation. Article 21 paragraph 1 specifies the items to be included in the capacity calculation methodology, and subparagraph c) reads:

“The proposal for a common capacity calculation methodology for a capacity calculation region determined in accordance with Article 20(2) shall include (c) a methodology for the validation of cross-zonal capacity in accordance with Article 26.”

9.1 Methodology for the validation of cross-zonal capacity according to Article 26

Article 26 paragraph 1 reads:

“Each TSO shall validate and have the right to correct cross-zonal capacity relevant to the TSO's bidding zone borders or critical network elements provided by the coordinated capacity calculators in accordance with Articles 27 to 31.”

The validation of cross-zonal capacities will be performed by each TSO to ensure the results of the capacity allocation process will respect operational security requirements. The regional coordinated capacity calculator will coordinate with neighboring coordinated capacity calculators during the validation process. The TSOs will also assess whether any additional cross-zonal capacity can be made available without risk to operational security.

The relation between the CGM, the physical grid constraints and the XB capacity is provided in the form of a matrix of PTDF factors and RAMS. The FB parameter matrix (PTDF matrix including RAMs) or simply the "FB parameters" contains the necessary data for maintaining safe transmissions in the grid. The FB parameters takes the form of numbers, and as such is difficult to comprehend. Thus, it is necessary to translate the data in the FB parameter matrix into recognizable information.

A few examples on information that that is possible to extract from the data matrix is: allowed maximum and minimum net position for each bidding area, allowed maximum and minimum flows on each grid constraint or bidding zone border, relations between allowed flow on a bidding zone border provided the flow on other borders.

Such information, and more, is extracted from the FB parameter matrix by a validation tool developed for the purpose. The tool is able to read multiple FB parameter matrixes and provide graphical information based on the numbers, for example time series for XB capacities for 24 hours (or more).

The TSOs will consider the operational security limits and the CGM to perform the validation, but may also consider additional grid constraints, grid models, and other relevant information. The TSOs may use, but are not limited to use, the tools developed by the coordinated capacity calculator for operational



security analysis. Thus, the TSOs might also employ verification tools not available to the coordinated capacity calculation.

Article 26 paragraph 2 reads:

“Where a coordinated net transmission capacity approach is applied, all TSOs in the capacity calculation region shall include in the capacity calculation methodology referred to in Article 21 a rule for splitting the correction of cross-zonal capacity between the different bidding zone borders.”

The rules for splitting the corrections of cross-zonal capacity will follow the same methodology as described in the methodology for Article 21b(vi).

Article 26 paragraph 3 reads:

“Each TSO may reduce cross-zonal capacity during the validation of cross-zonal capacity referred to in paragraph 1 for reasons of operational security.”

The TSOs will reduce the cross-border capacity if the calculated capacities would allow the capacity allocation process to create a result that could put operational security at risk. The TSOs will reduce the cross-zonal capacity in a manner that would minimize any negative impact on the market by applying the same rules for splitting the cross-zonal capacity as is described in the methodology for Article 21b(vi).

Article 26 paragraph 4 reads:

“Each coordinated capacity calculator shall coordinate with the neighboring coordinated capacity calculators during capacity calculation and validation.”

The coordinated capacity calculator will provide information on reductions or increases in cross-zonal capacity to the neighboring coordinated capacity calculators.

Any information on increased or decreased cross-zonal capacity from neighboring coordinated capacity calculators will be provided to the TSOs. The TSOs may then apply the appropriate reductions or increases of cross-zonal capacities according to Article 26.



10 Fallback

Modern society needs continuous supply of electric power. Well-functioning electricity markets are the means to meet that need, and they require valid information on transmission capacity in order to operate. If the primary transmission capacity calculation fails partially or as a whole there shall be fallback measures producing replacements for any missing data.

According to CACM Regulation Article 21.3 "The capacity calculation methodology shall include a fallback procedure for the case where the initial capacity calculation does not lead to any results".

It is assumed here that fallback procedures will be implemented separately for different parts of the capacity calculation (including capacity validation and publication) and will cover missing or erroneous CGMs, GSKs and grid constraint definitions and communication channel failures. The fallback procedures will cover both long and short durations of system problems.

Detailed descriptions of fallback procedures can be created only after the primary capacity calculation and allocation process has been designed in detail.



11 Impact assessment

In this section the impacts of the different methodologies are assessed. First, the quantitative impact of the methodologies is assessed by analyzing and comparing the outcome, both in terms of economics and operational parameters, of the market simulations for FB and NTC. In addition, some cases that have been identified, where FB potentially can provide additional benefits, are shown. NTC approach is used as a proxy for CNTC approach due to the lack of CGMs with sufficient quality for CNTC calculations. NTC approach is a well-known capacity calculation approach and well-understood by market participants. For this reason it is considered to be a good baseline for FB comparison.

Secondly, the qualitative impact of the methodologies is assessed by analyzing the impact on other electricity markets, bidding zone delineation, congestion income distribution, non-intuitive flows, transparency, and long-term investment decisions.

Finally, the costs for developing and implementing the different methodologies are compared and assessed.

11.1 Quantitative impact assessment

At the time of composing this document, it is not possible to test the FB methodology with industrial tools, operational processes, and the target CGM. Based on the existing prototype tools though, there is sufficient comfort at the TSOs, to enter into the next stages of development. This is what is captured in this document.

This implies though, that the quantitative simulations that are presented in this section are based on – amongst others- prototype tools, non-operational processes, and prototype CGMs. This may have an impact on the quantitative results as they are presented, though it is hard to assess their impact. Nevertheless, in the following, an overview of the currently-used assumptions in the FB capacity calculation are listed.

- Reliability margin
For the (thermal) CNEs an FRM = 0 has been applied. The (voltage and dynamic stability) cuts in the Nordic system – they are computed by the local TSOs in their local tools, by using their local grid models – are provided as an input to the FB capacity calculation, like they are to the local NTC capacity calculation. This holds true for the TRMs on those cuts as well: the same value is applied in both the FB capacity calculation as well as in the operational NTC capacity calculation. The difference for cuts (compared to the operational NTC capacity calculation) only comes into play when the FB capacity calculation assesses the PTF factors for the cuts, and takes into account the reference flows, to assess the RAMs on the cuts. As the Nordic system is mainly limited by those (voltage and dynamic stability) cuts, the assumption of having an FRM = 0 on the (thermal) CNEs is not expected to severely impact the quantitative results.
- Operational security limits



Please note that the FB capacity calculation is not an operational procedure yet. Although operators are consulted in the review stage, they are not personally involved in the FB capacity calculation process yet. The operational security limits applied in the FB capacity calculation, are the same as the ones applied in the current NTC capacity calculation, and are likely to be the ones to be applied in the FB operational process as well.

- **Contingencies**
n-1 outages are taken into account for the thermal limits (CNEs) , and are the ones to be applied in the FB operational process as well.
- **Allocation constraints**
The allocation constraints applied are the same as applied under the operational NTC capacity calculation and allocation. The allocation constraints consist of the implicit loss factors of DC links only (ensuring that the DC link will not flow unless the welfare gain of flowing exceeds the costs of the corresponding losses), for those DC links where this has been implemented, and maximum flow change on DC-links between MTUs (ramping restrictions).
- **Generation shift keys**
One common GSK strategy has been applied for all bidding zones in the FB capacity calculation. This is strategy number 6, as mentioned in Table 8-1.
- **Remedial actions**
Remedial actions have been applied in the form of FAV values, which might also include additional adjustment values in addition to RAs.
For Norway, automatic response systems where load, generation, HVDCs or other grid components are automatically disconnected or adjusted, are reflected by the FAV values. The FAVs are applied both to cuts and CBCOs
- **Undue discrimination between internal and cross-zonal exchanges**
The grid constraint selection process, as described in Section 6.2, is applied with a threshold value of 15%.
- **Previously allocated cross-zonal capacity**
No previously allocated capacity has been considered in the DA FB capacity calculations.
- **PTDF distribution factors**
The FB parameters are computed in a commercial software tool, that has been set up by the Nordic TSOs, and enhanced by scripts, for the FB capacity calculation purposes. Both the PTDF factors for cuts and CNEs are computed by this prototype tool.
- **Remaining available margins on critical network elements**
The remaining available margins are computed in a stepwise manner: $RAM = F_{max} - FRM - F_{ref}' \pm FAV$. The F_{max} values are set by the TSOs: they are physical properties for the grid constraints, whereas they are computed for the (voltage and dynamic stability) cuts in the Nordic system (by the local TSOs in their local tools, by using their local grid models). The FRMs are set by the TSOs as well (see the first bullet on reliability margin).The F_{ref} (being the basis for the F_{ref}') is



computed from the prototype common grid model (CGM) in the same software that computes the PTDF factors. The FAV is set by the TSOs, depending on the application of remedial actions.

- CGM

The prototype CGM is used for the computation of the PTDFs, and the Fref (being the basis for the Fref'). The quality of the prototype grid models is the best we can have at this moment in time; they do not allow for dynamic analysis and detailed voltage/reactive power analysis though

- Sharing of power flows between CCRs

No sharing of power flows between CCRs is applied. Indeed, the so-called advanced hybrid coupling is being applied in the FB capacity calculation and allocation. The converter stations of the DC interconnectors are modelled as 'virtual' bidding zones in the FB system (a bidding zone, without order books though), having their own PTDF factors reflecting how the exchange on the DC link is impacting the AC grid elements. Or in other words: the flows on the DC links are competing for the scarce capacity on the Nordic AC grid, like the exchanges from any of the other CCRs.

- Failures in the FB capacity calculation

Mainly because the prototype CGM poses some challenges, for some of the hours (~6 %) in the FB capacity calculation no FB parameters can be computed. For these hours, in the capacity allocation simulation, the FB parameters are replaced with the operational NTC values of those hours. The future operational CGM and FB process are more robust. In the rare case that no FB parameters can be computed a proper fallback solution needs to be in place.

- Market simulations

The FB market coupling simulations are done in the European Power Exchanges' Simulation Facility by using historical order books (being order books from the operational NTC mechanism). Furthermore, the geographical scope of the FB market coupling simulations is limited to the Nordics + CWE + GB + Baltics.

11.1.1 Socioeconomic welfare of FB per country/per bidding zone per element (PS, CS, CR)

In this section we present the results from the market simulations where we compare the FB with the NTC approach. The market results are simulated with Euphemia, the current DA market coupling algorithm, in the Simulation Facility.

Objective function of the algorithm

The algorithm aims to maximize the welfare in the whole region taking into account grid constraints. The welfare consists of Consumer surplus, producer surplus and congestion revenues, see Figure 11-1.

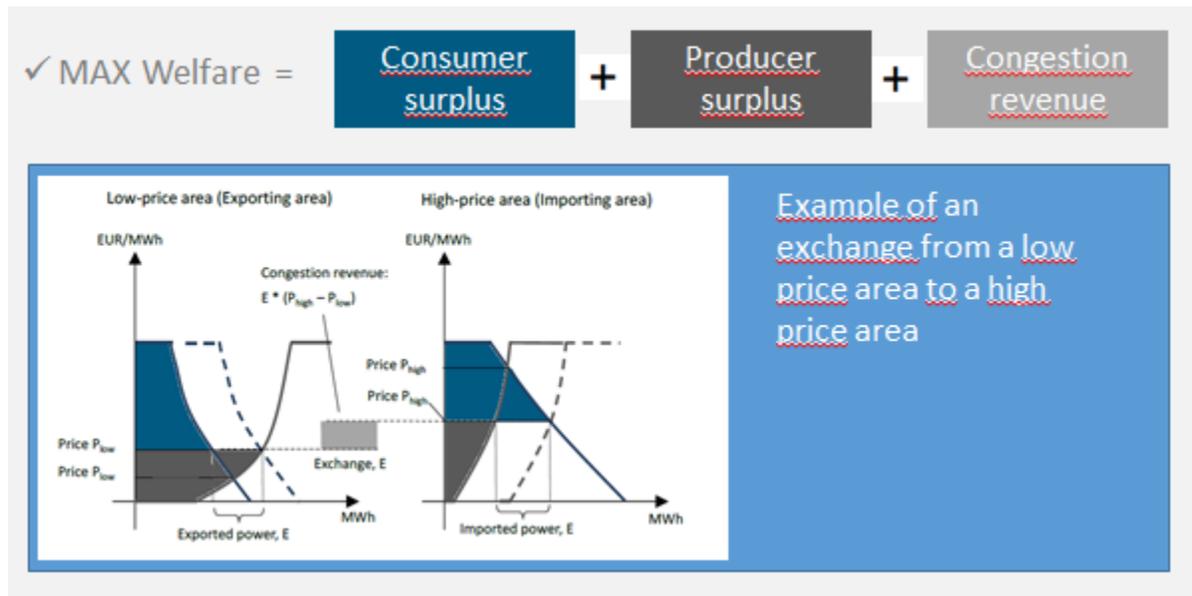


Figure 11-1 Objective function of the market coupling algorithm

The Producer Surplus measures for the sellers, whose orders are executed, the difference between the minimum amount of money they are requesting and the amount of money they will effectively receive. The Consumer Surplus measures for the buyers, whose orders are executed, the difference between the maximum amount of money they are offering and the amount of money they will effectively pay. The congestion revenue is equal to the product of the cross-border price spread and the implicit flow obtained by the market algorithm. The congestion revenues are assumed to be shared on a 50/50 basis between the involved TSOs on each side of the borders.

The order books used for the market simulations are the ones available in Simulation Facility, i.e. historical NTC order books for Northern Europe. The difference between the approaches is in how the grid constraints are represented in the algorithm. In FB, the grid constraints consist of PTDFs and RAMs for all limiting grid constraints, and in CNTC/NTC the grid constraints consist of capacity values for each bidding zone border.

Some of the hours in the FB results lack FB parameters; these hours are replaced with NTC values. We have simulated 16 weeks in total and compared the welfare results in the FB approach and the current NTC approach. The selection of which weeks are simulated is based on the availability of data and the availability of operators. Due to lack of grid models, some weeks have been disregarded from the simulations.



A general observation and starting point is that when there is no congestion in the system, the result from FB and NTC is expected to be similar. It is when the system is stressed, with significant congestions, that the result is expected to differ between the two approaches.

FB can potentially increase the available capacity for cross border trade. This impacts the prices in the various bidding zones. If the price drops in one bidding zone the consumer surplus increases and the producer surplus decreases. Depending on the slope of the supply and demand curve and the amount of supply and the demand orders in the bidding zone, the change in price leads to a welfare increase or loss, e.g. a bidding zone with a lot of supply orders and a small amount of demand orders will face a welfare loss if the price drops and vice versa.

Impact on socio-economic welfare

For all 16 simulated weeks FB increases the welfare in the Nordic countries with 3900 k€ compared to the NTC approach, see Figure 11-2. Furthermore, we observe a welfare redistribution. The Nordic consumer surplus increases with 58 MEUR compared to the consumer surplus in the NTC approach. The congestion rent in the Nordic area drops with 17 MEUR and the producer surplus decreases with 38 MEUR compared to the NTC approach.

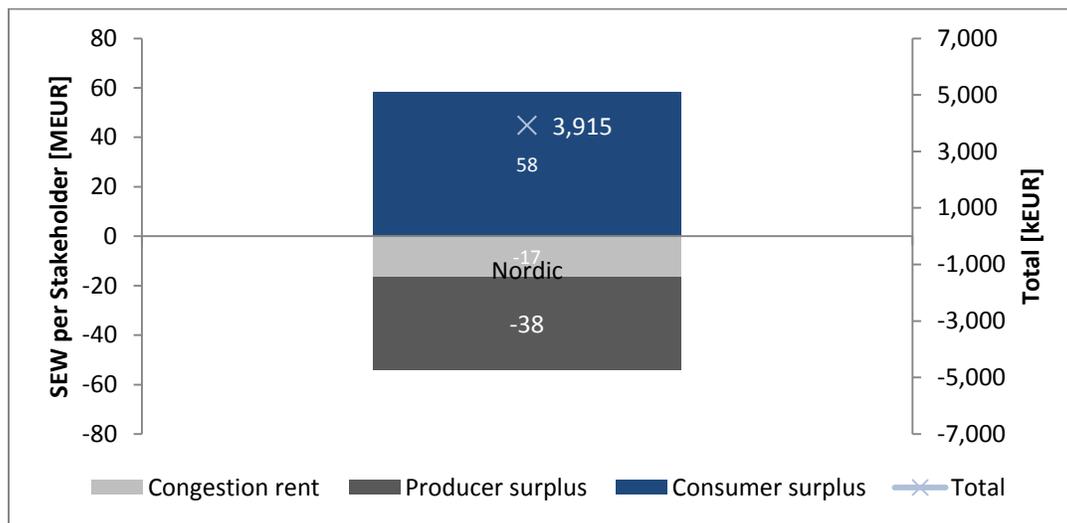


Figure 11-2 Nordic socio-economic welfare, FB compared to NTC for all simulated weeks

This indicates that FB manages to lower the prices and congestion rents by improving the capacity allocation.



When looking at the results on a weekly basis in Figure 11-3 we can see that most welfare increase was generated during a few weeks. Most welfare was gained in week 3 and 43 followed by week 2, 41, 44 and 46.

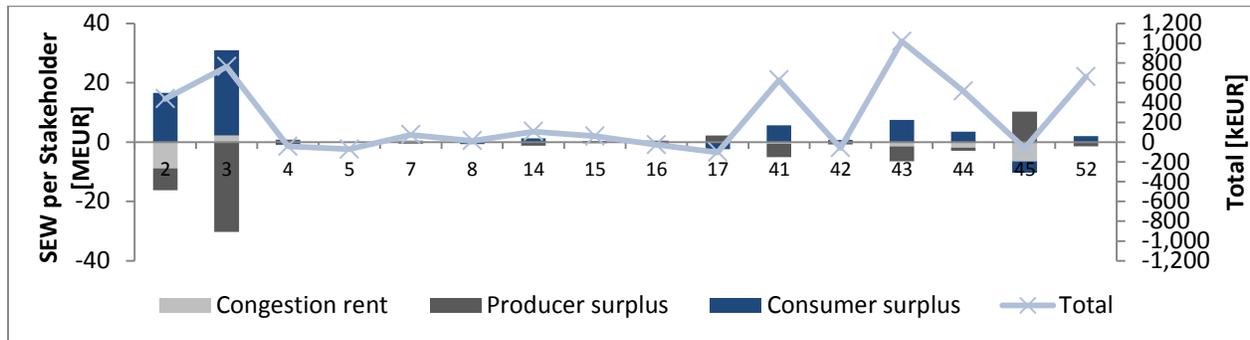


Figure 11-3 Nordic socio-economic welfare per week

The welfare gain in week 3 and 43 is driven by a drop in the average prices in most of the Nordic areas. For the other weeks there were no large differences between FB and NTC. None of the weeks shows a substantial welfare gain for NTC.

Figure 11-4 shows the impact on socio-economic welfare in each Nordic country, FB compared to NTC. The socio-economic welfare drops slightly in Denmark due to loss of congestion rent in FB. The producer and consumer surplus increases marginally but this increase is outweighed by the loss of congestion rents. In Finland, the socio-economic welfare increases because of increased producer surplus and congestion rents. This welfare gain is driven by lower prices on average in FB compared to NTC.

Norway faces a small gain for the simulated weeks. Both producer and consumer surplus increases. There is a significant loss of congestion rent in the FB approach because of increased price convergence. It is important to note that the congestion rent is shared by the TSOs in accordance with ownership of the particular interconnector and is based on a sharing key of 50/50 and no reallocation has been done to compensate for non-intuitive flows. For internal borders the relevant TSOs receives all congestion rents. The congestion rent sharing is not part of this proposal but as explained later in this document it is expected that the current sharing keys will change to manage FB.

In Sweden, the socio-economic welfare increases because of increased consumer surplus and congestion rent. The producer surplus shrinks. The redistribution of welfare from producers to consumers is driven by lower average prices in all Swedish bidding zones.

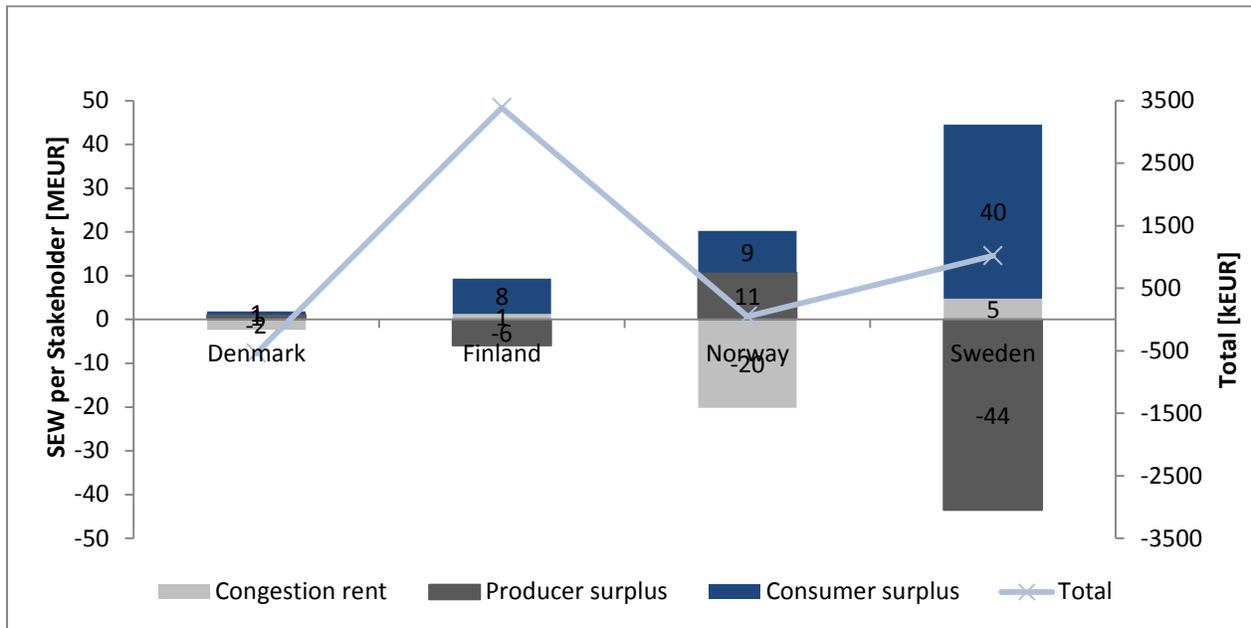


Figure 11-4 Nordic socio-economic welfare per country, FB compared to NTC for all simulated weeks

Average bidding zone prices

As mentioned above the welfare results indicate that FB lowers the prices in the Nordic region. Figure 11-5 shows the average prices in the Nordic bidding zones. FB manages to lower the prices in most bidding zones compared to the NTC approach.

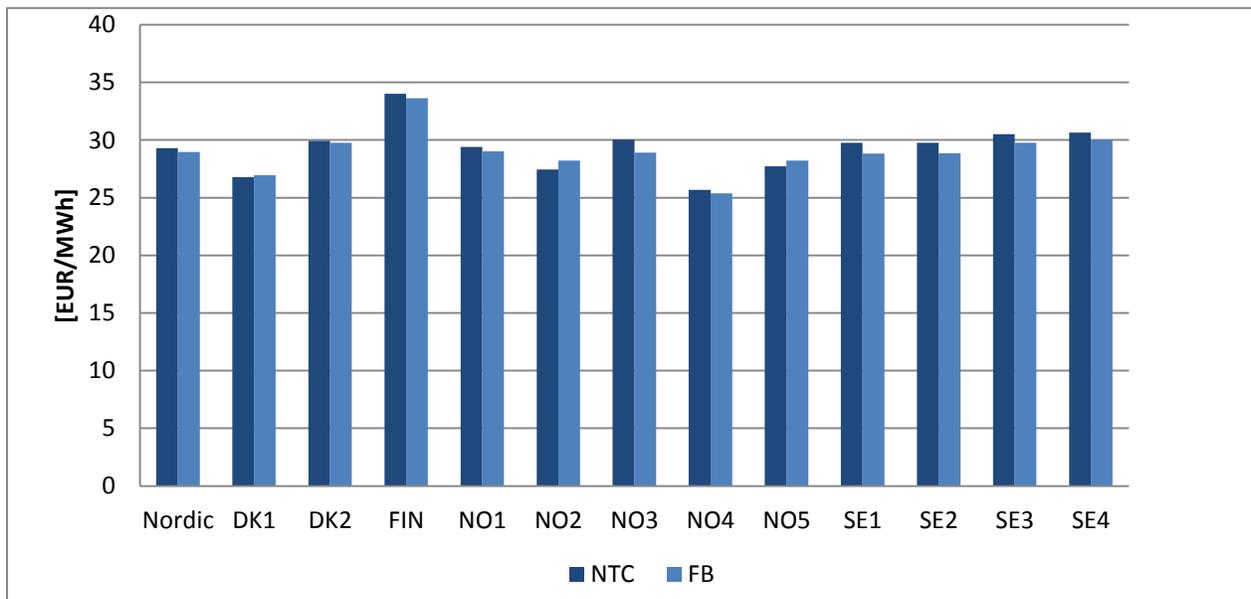


Figure 11-5 Average prices in the Nordic bidding zones in [EUR/MWh]



The average price difference between the FB and the NTC approach is below 1 EUR/MWh in most bidding zones, see Figure 11-6. The Nordic average price drops -0,3 EUR/MWh in FB compared to the NTC approach. In DK1, NO2 and NO5 the prices increase on average, while the rest of the bidding zones face lower prices on average.

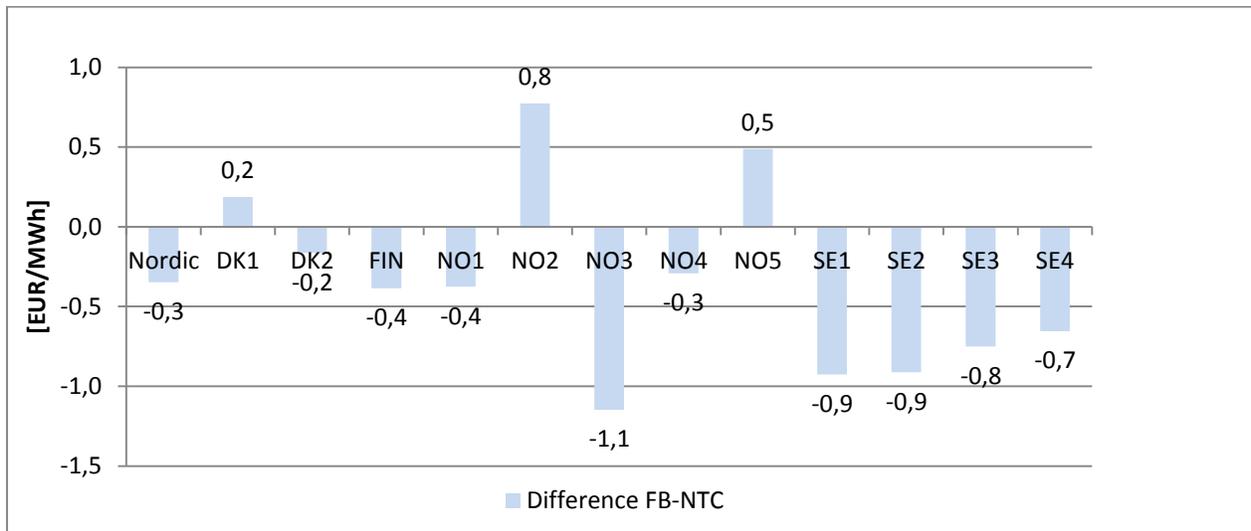


Figure 11-6 Difference average prices between FB and NTC in all Nordic bidding zones

Net positions

Figure 11-7 shows the Nordic net position during the simulated weeks for the FB and NTC approach. As expected, the net position is more positive on average, i.e. more export from the Nordic region, in FB. The average weekly Nordic net position is 144 GWh in FB and 139 GWh in NTC for the simulated weeks.

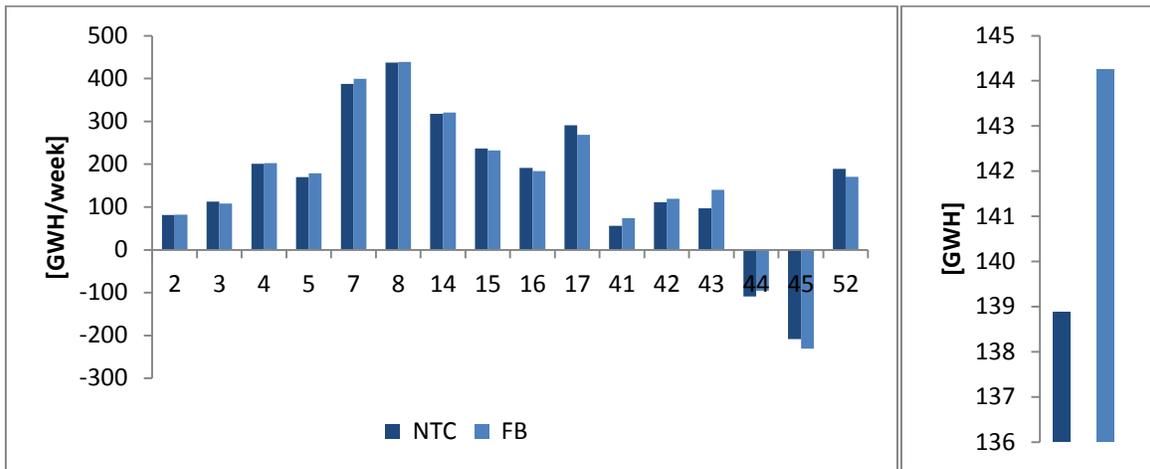


Figure 11-7 Nordic net position per week 2-5, 7-8, 14-17, 41-46 and average. The figure to the left is the weekly net position in [GWh/week]. The figure to the right is the average weekly Nordic net position in [GWh]

Figure 11-8 shows the hourly average net position in the Nordic bidding zones for the simulated weeks. FI, NO1 and SE4 are the bidding zones with highest import in both NTC and FB. The bidding zones with most positive hourly average net position are NO2 and SE2 in both NTC and FB.

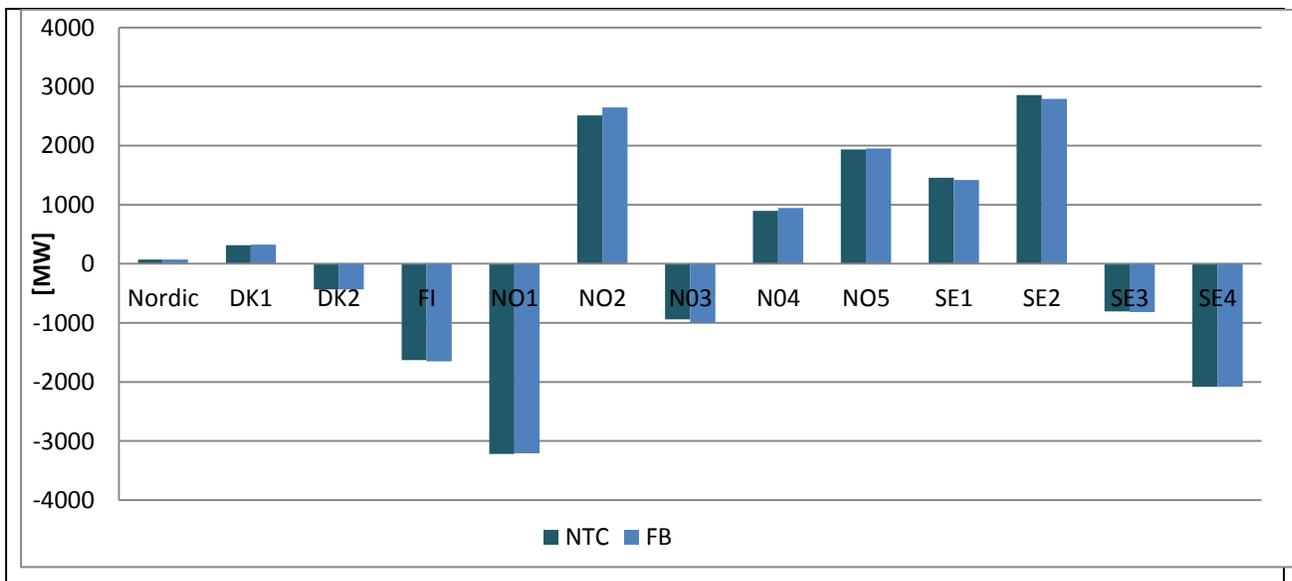


Figure 11-8 the hourly average net position in the Nordic bidding zones



Figure 11-9 shows the difference average hourly net position in the Nordic bidding zones between FB and NTC for the simulated weeks. The hourly average net position increases most in NO2 and NO4 during the simulated weeks. The hourly average net position decreases the most in NO3, SE1 and SE2. On an aggregated Nordic level the average hourly net position increases marginally in the FB solution for the simulated weeks.

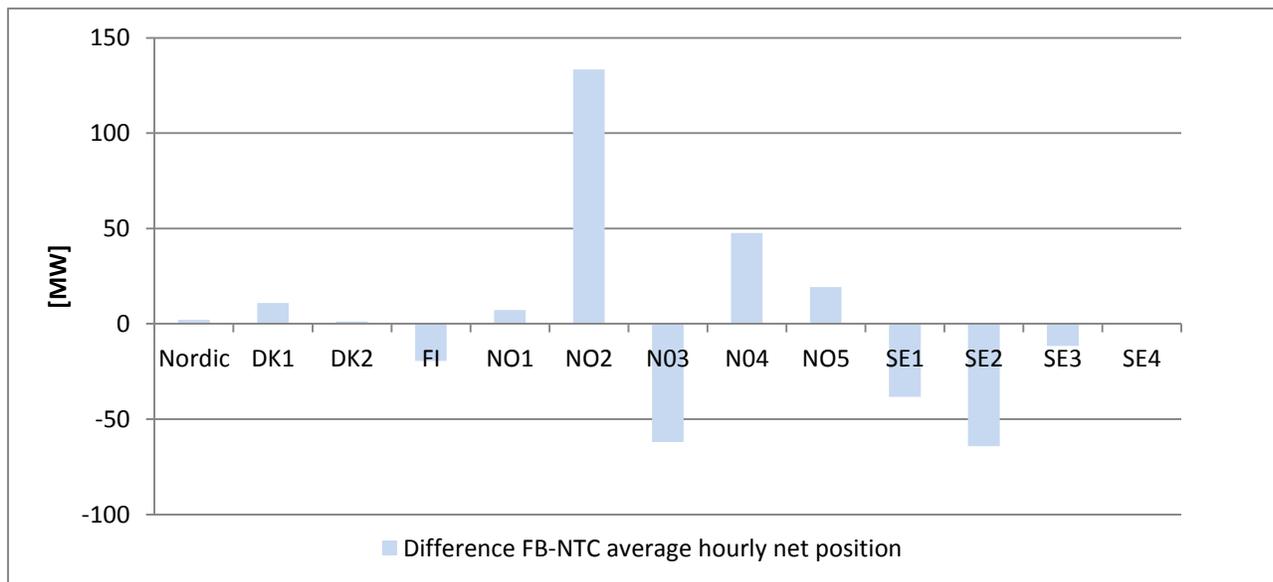


Figure 11-9 Difference between FB average hourly net position and the NTC average hourly net position in the Nordic Bidding zones for the simulated weeks

However, there is a risk to overestimate the possibility to increase the net position in the different Nordic bidding zones due to limitations in the amount of water available in the hydro reservoirs. In the market simulations, the NTC order books are used as an input. If the export increases in FB during the first part of the weeks this is not reflected in the order books for the coming weeks.

11.1.2 Impact on capacity domains and cross bidding zone exchange

Because the allocation methodologies used in FB and NTC are different, the market results and the resulting power flows are also different depending on whether FB or NTC is used. An overload arises when the grid constraint flow resulting from the market results is higher than the RAM of this grid constraint.



The power system impact analysis presented in this section compares overloads, measured in MWh/h, resulting from the FB and the NTC allocation methodologies. The same 16 weeks as in the previous section are used.

Overloads in NTC

A number of different reasons can cause the overloads seen in the NTC market outcome. An important reason is that the NTC capacities are too high compared to the identified grid constraints. This means that NTC price coupling allows for market solutions outside the FB security domain. This can be due to the TSOs allowing for overloads to enhance the market efficiency, knowing that this will require the use of remedial actions to reduce the flow on these grid constraints. It can also happen if the NTC market outcome is significantly different from the forecasted market outcome used when the NTC capacities were calculated.

Another reason is related to the network topology being used in the prototype capacity calculation process. This network topology is from the real operational measurements for the relevant timeframe, and can contain changes compared to the forecasted network model. Some examples of differences that can affect the result are unplanned disconnections of components such as lines, cables and transformers or planned outages where the connections and disconnections do not follow the planned schedule.

Overloads in FB

Forecasted overloads in the FB market outcome can occur on the grid constraints that were not considered in the capacity calculation process because they are not market relevant.

The number of grid constraints considered in the capacity calculation process differs between areas and hours. One grid constraint can be considered in one hour but not the next. The reason for changing from one hour to the next can be caused of topology changes which can have an impact on the PTDF that for one hour will have a big enough impact of the market flow and therefore be monitored, but in the next hour with different topology the market impact on the PTDF is too small and the CNE will therefore not be monitored. Also the TSOs can change the values of monitored CNEs between hours which also will impact the number of CNEs.

The reason for different number of grid constraints in the areas depends on net topology and operational aspects. The TSOs have different security criteria's and includes CNEs from different voltage levels and therefore the number of CNEs and different between areas. Figure 11-10 shows the average number of grid constraints provided to the power exchange for the simulated hours. The total number of grid constraints considered in the capacity calculation, and monitored for overloads is much higher.

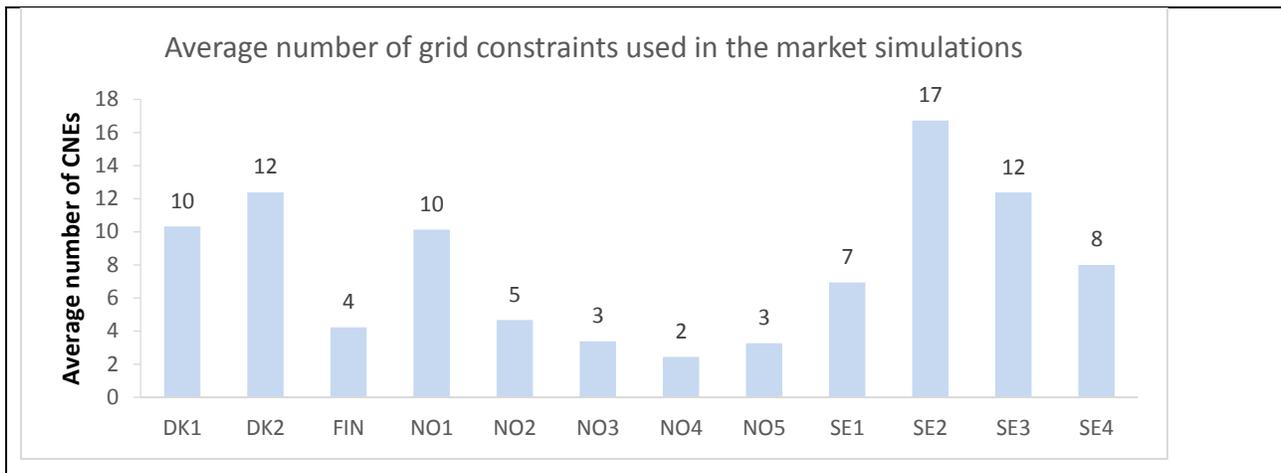


Figure 11-10 Average number of grid constraints per area for the monitored hours

Results: average overloads in FB and NTC

A comparison of the average overloads is shown in Figure 11-11. The values present the average system-wide overloads summarized for all the grid constraints. The results show a lot more overloads measured in NTC than in FB. Hours with missing FB data are removed from the NTC and FB results.

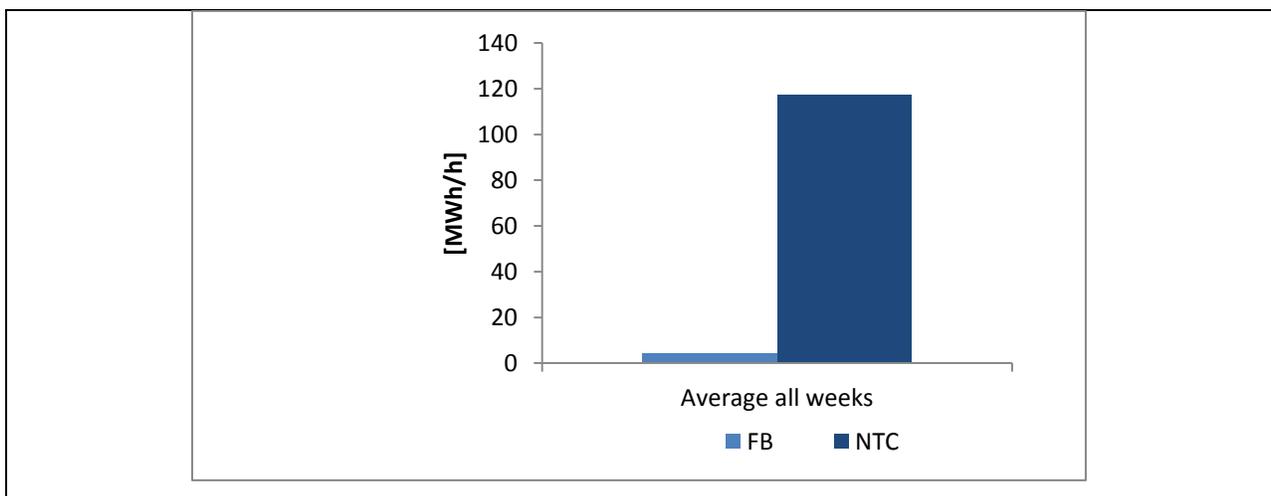


Figure 11-11 A comparison of the average overloads

The average overloads per week are shown in Figure 11-12.

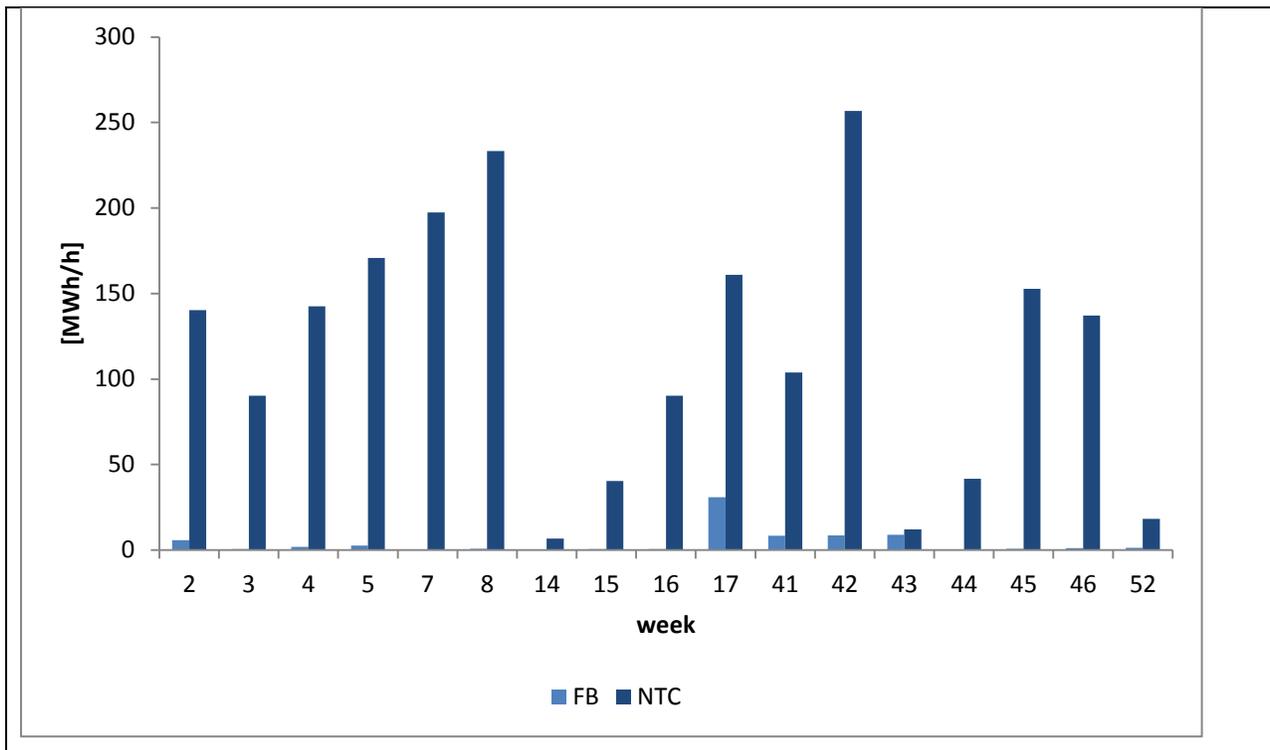


Figure 11-12 The average overloads per week system wide

The comparison of the hourly average overloads per area is shown in Figure 11-13. The results indicate that most of the overloads measured in NTC are found in DK2, SE1 and NO4. These overloads decrease significantly in FB. The measured overloads are dependent on the number of grid constraints in the areas. A high number of grid constraints will easier lead to a high value of overload in an area. The point of the figure is to show the difference between FB and NTC. The grid constraints and the attached Fmax are the same in FB and NTC.

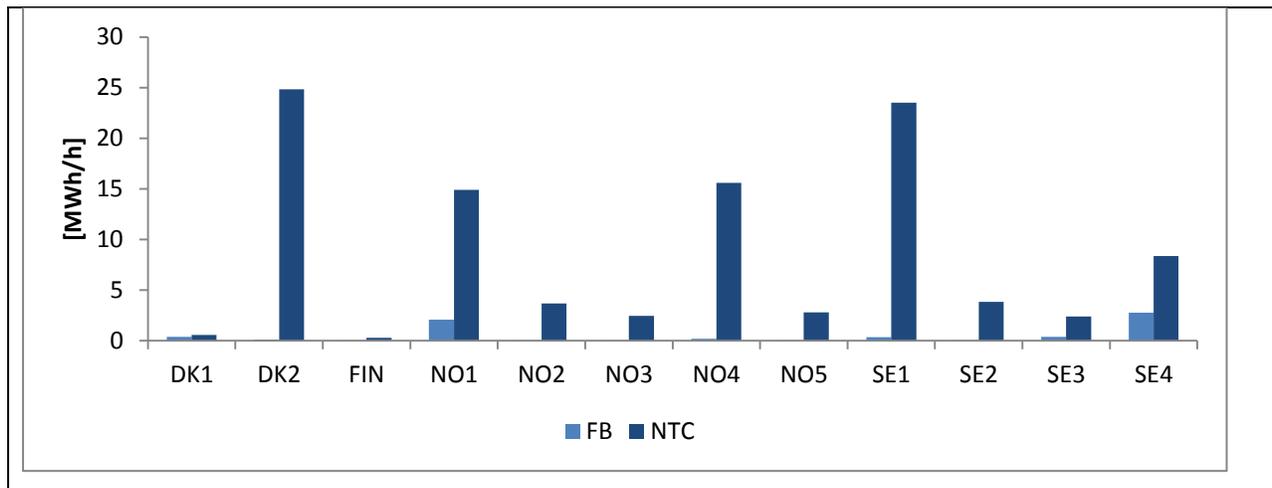


Figure 11-13 The comparison of the hourly average overloads per area

Results: Economic gain VS grid overloads

The total welfare and the net reduction in overloads are plotted in Figure 11-14. Each of the blue dots represents one hour of the 16-week period used in the power system impact analysis. In contrast, the results presented before in Figure 11-13 and Figure 11-12 are average results per area or per week.

Values above the x-axis are representing a positive total welfare in FB compared to NTC and the values under the x-axis are representing a negative total welfare in FB compared to NTC. The values to the right of the y-axis are representing the reduction of overloads in FB compared to NTC. The values to the left of the y-axis are representing the increase of overloads instead. Therefore the values in the upper corner to the right are representing a positive total welfare and reduction of overloads in FB compared to NTC. The values in the lower corner to the left are representing a negative total welfare and increase of overloads in FB compared to NTC.

The figure also shows the proportion of hours in each quadrant. For example is the upper right corner including 48.3 percent of all hours and the lower right corner 38.3 percent. The upper and lower left corner includes 9.0 percent and 1.7 percent respectively. The hours that are placed exactly on an axis are not included in a corner. The hours placed on the x-axis contain no difference in total welfare for FB compared to NTC. Same goes for the hours placed on the y-axis since these hours contain no difference in net reduction in overloads. In Figure 11-15, that shows a zoom of Figure 11-14, we see that the majority of the hours are in the upper right corner.

The average and median values are in that same corner. In the 16-week period used in the impact analysis, FB resulted in an average gain in welfare of 1404 €/h and an average reduction in overloads of 118 MWh/h, compared to NTC. Therefore, for this 16-week period, FB performed better both in terms of market welfare and avoided overloads.

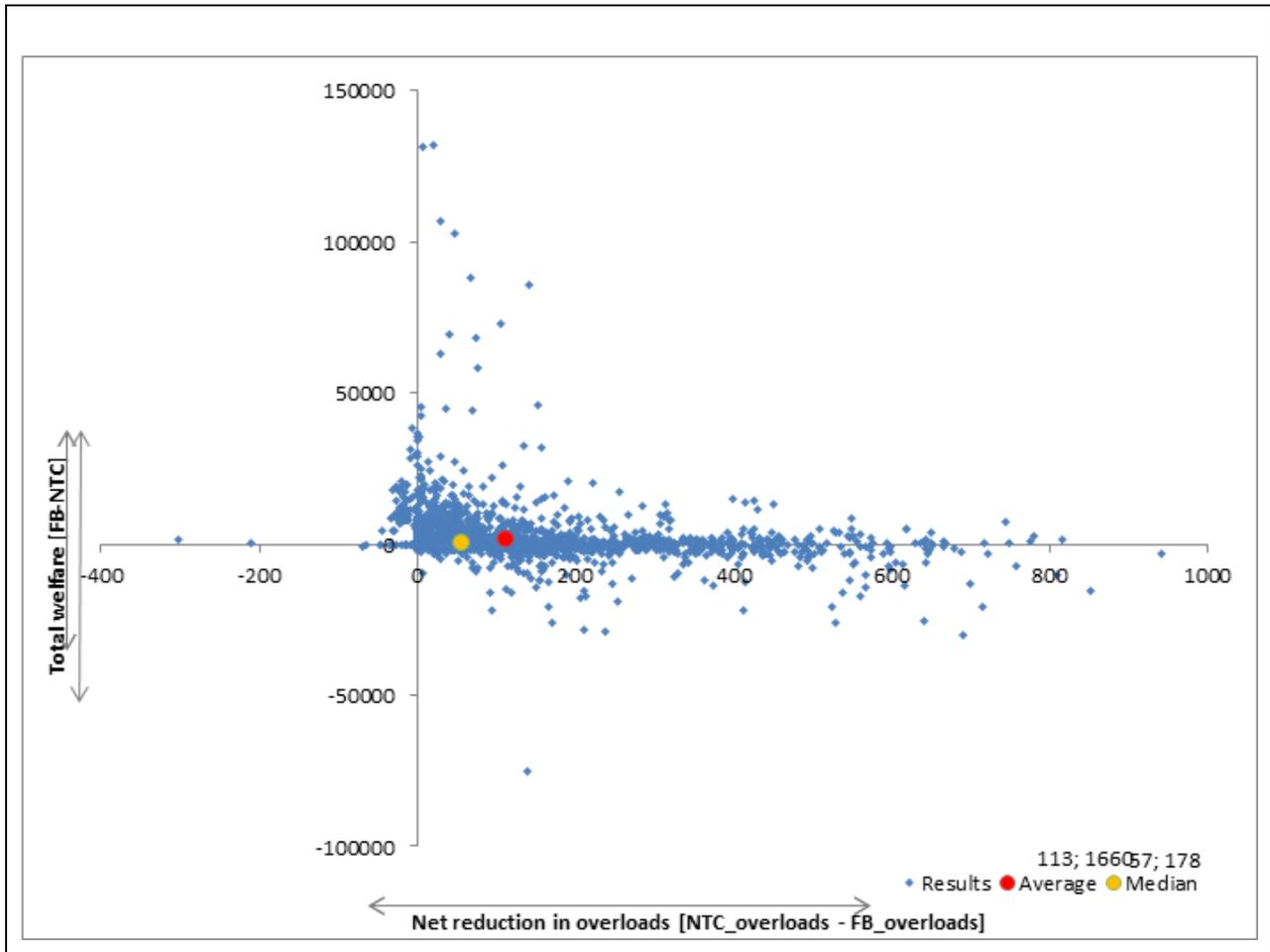


Figure 11-14 The total welfare and the net reduction in overloads

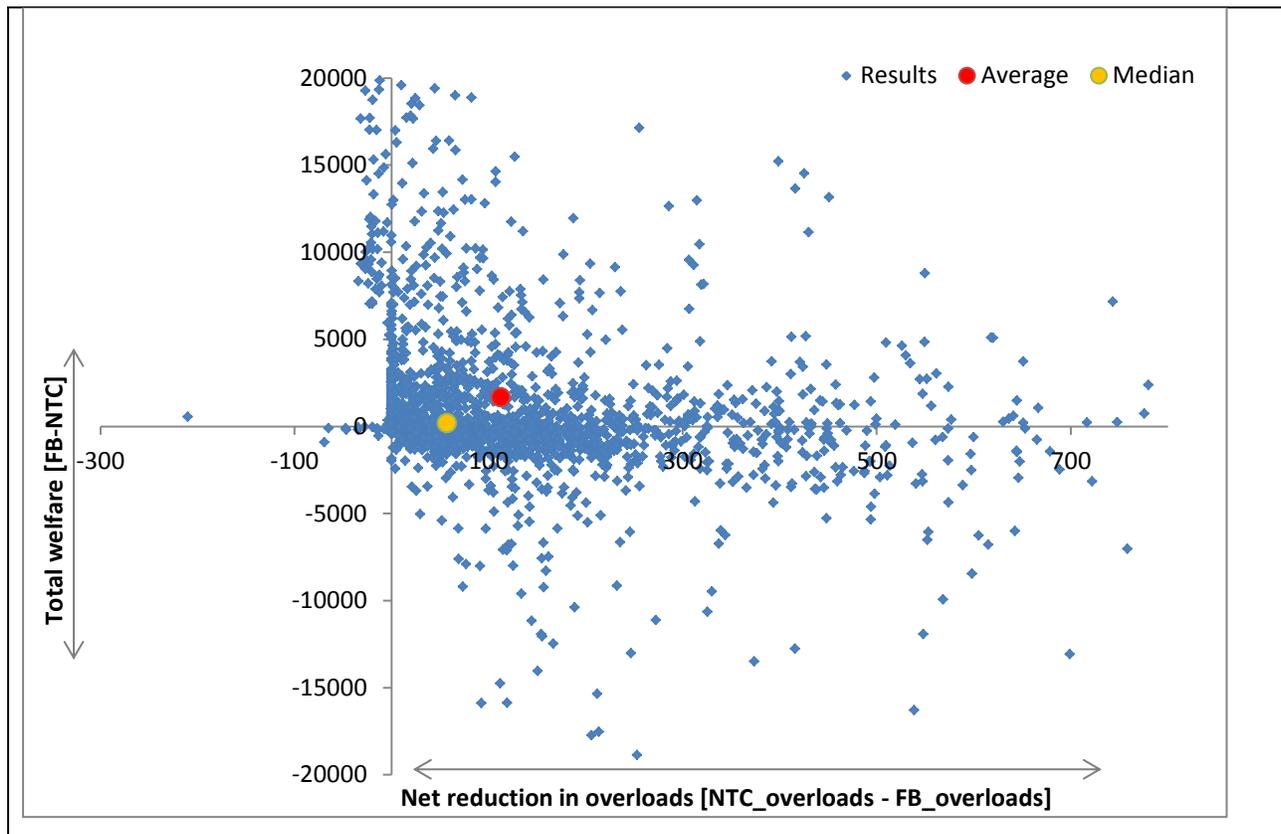


Figure 11-15 Zoom in of Figure 11-14

11.1.3 Selected cases illustrating FB benefit (in detail)

The objective of this section is to provide a more in-depth understanding of the difference of FB compared to (C)NTC. This is done by presenting a selection of concrete situations in the Nordic power system. The section provides three cases:

- The existence of non-intuitive flows
- Better utilization of capacity on a new line between bidding zones NO3 and NO5
- Better management of the West Coast cut in Sweden

One case of non-intuitive flow

In this case we show how non-intuitive flows can occur in FB and enable a larger flow between SE1 and SE2. In Figure 11-16, we show a simplified example of an hour with high consumption and low wind production in the Nordic countries. The bidding zone prices are highly affected by a grid constraint with a high shadow price (see also section 11.2.5) between SE2 and SE3. To relieve this congestion, the FB solution reduces the flow on the border between SE2 and SE3 and increases the flow on the border between SE1 and SE2. The increased transaction between SE1 and SE2 has a relieving impact on the limiting grid constraint, i.e. the PTDF-margin is negative for trade between SE1 and SE2.



In the NTC approach EE, DK2, FI, NO1, NO3, NO4, SE1-4 constitute one price area and NO2, NO5 and DK1 constitute one price area. The FB approach manages to lower the prices compared to the NTC approach in most bidding zones due to a different way of managing the congestion.

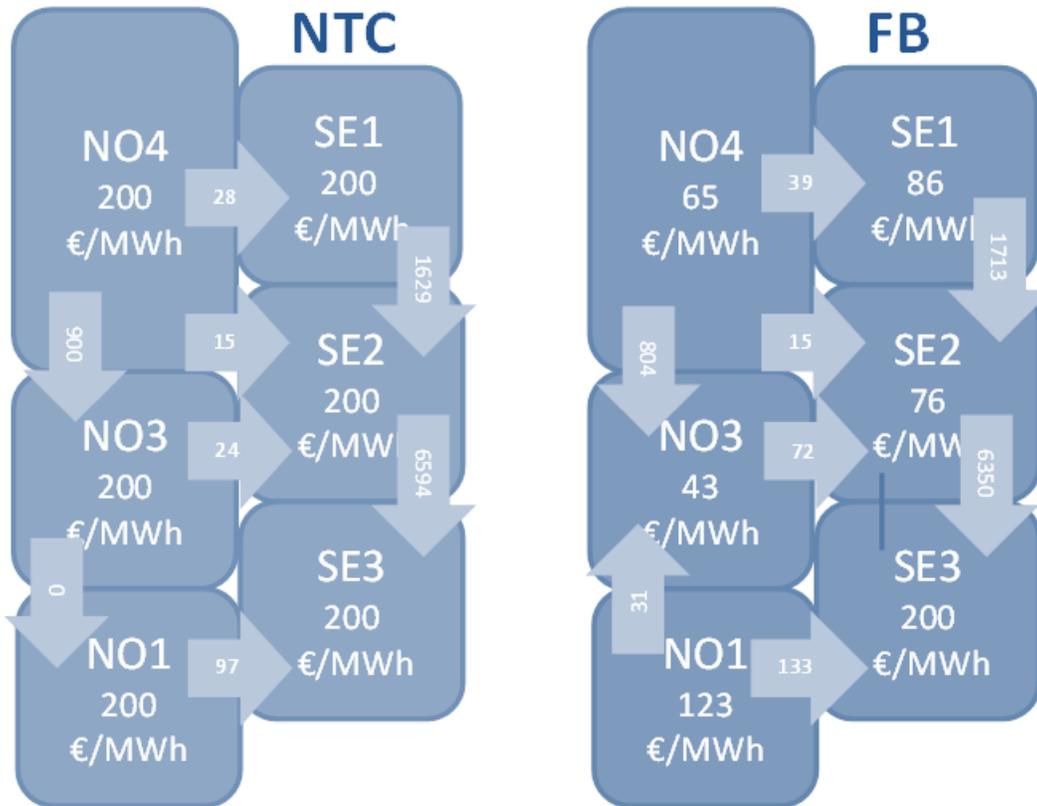


Figure 11-16 Simplified example with non-intuitive flow between SE1 and SE2

Case study NO3-NO5 (Ørskog-Sogndal)

During 2016, Statnett has taken a new transmission line - connecting the bidding zones NO5 and NO3 - in operation, see Figure 11-17. The new line contributes significantly to the transmission capacity connecting Southern and Middle Norway, and thus increases the North-South transmission capacity in the Nordic power system.

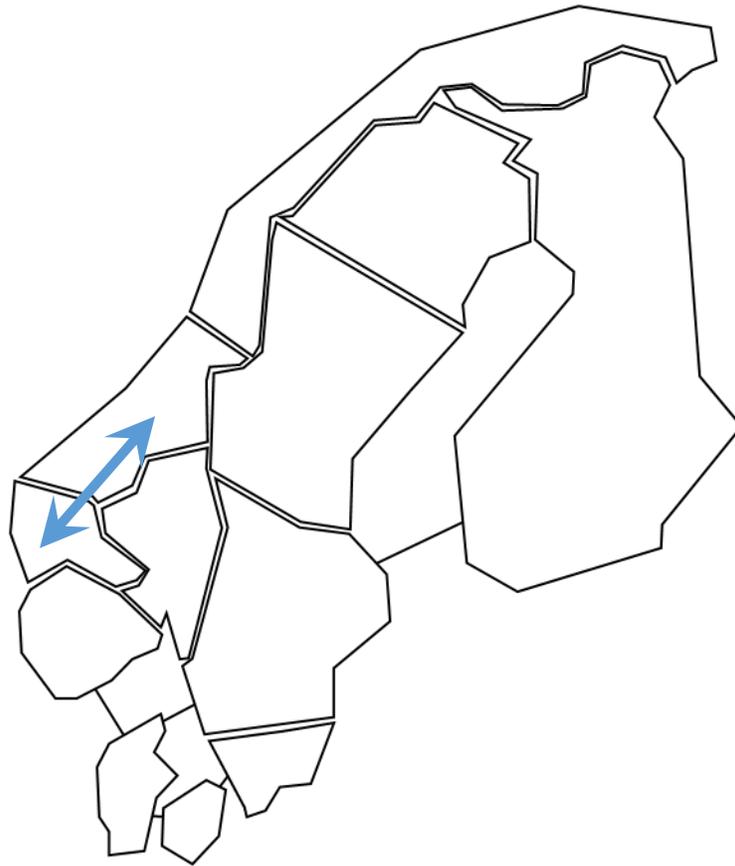


Figure 11-17 The line Ørskog-Sogndal (NO3-NO5)

The new line will provide a parallel path to the existing North – South interconnectors NO1-NO3 and SE2-SE3, which means that any trade between Northern and Southern Scandinavia will induce flows on all three interconnectors. This makes it challenging to determine the optimal capacities as all lines are influenced by transit flows from commercial exchanges on the other lines. The transit flows are disproportionately greater for the Norwegian lines due to the much greater transmission capacity on the Swedish side.

The existing interconnector NO1-NO3, which has the same issue on a smaller scale, is currently handled by limiting the available commercial capacity to zero, as Statnett decides ex ante the commercial flow on the interconnector. Zero or reduced capacity at the new line would incur a large cost as not all of the new transmission capacity becomes available to the market.



How can FB capacity allocation improve the situation?

FB has the potential to provide a better solution to this challenge by significantly reducing the uncertainty that accompanies the discrepancy between NTC market exchange and the realized physical flows.

The challenge described above, and the potential of FB to improve the situation, was explored using empirical data: a simplified PTDF matrix from the Samnett simulation model, and the optimization engine in Excel. The approach was to do a simplified price calculation (simulating the allocation mechanism) using both NTC and FB for individual hours, using historical NPs and prices as a starting point.

More information regarding the model set up and assumptions are given in the Annex section.

We have, as a starting point, made the assumption that the market flows on the borders that were congested in the historical market outcome were not allowed to increase, while the rest of the borders were considered open for additional trade. In the initial NTC solution, NO3, NO4 and the Swedish bidding zones constitute one price area with a lower price, whereas NO1, NO2 and NO5 constitute one price area with a higher price, see Figure 11-18.

The effect of adding 100 MW NTC capacity on the new line was compared to the FB solution (with no limit on the new line), and both were compared to the original market outcome. An important effect of the FB set up was that the commercial flow on NO1-NO3 was no longer determined ex ante, but the flow was not allowed to increase compared to the NTC market outcome.

The results show that any commercial exchange on the new line using the CNTC approach would create physical overloads in other parts of the Nordic grid. The results also show that FB can provide a better solution than the CNTC approach, without creating the same overloads.

The figure below shows the realized physical flows resulting from the commercial NTC exchanges, referenced to the original market outcome in the NTC approach.

From Figure 11-18, one can tell that 100 MW additional capacity for commercial exchange between NO3 and NO5, leads to a 74 MW increased load on the already-congested line NO1-SE3, while 9 MW goes from NO3 to NO1. Only 16 MW of the 100 MW additional commercial exchange appears as physical flow on the new interconnector between NO3 and NO5. The price in NO3, NO4 and the Swedish bidding zones increases marginally and the price in NO1, NO2 and NO5 decreases slightly.

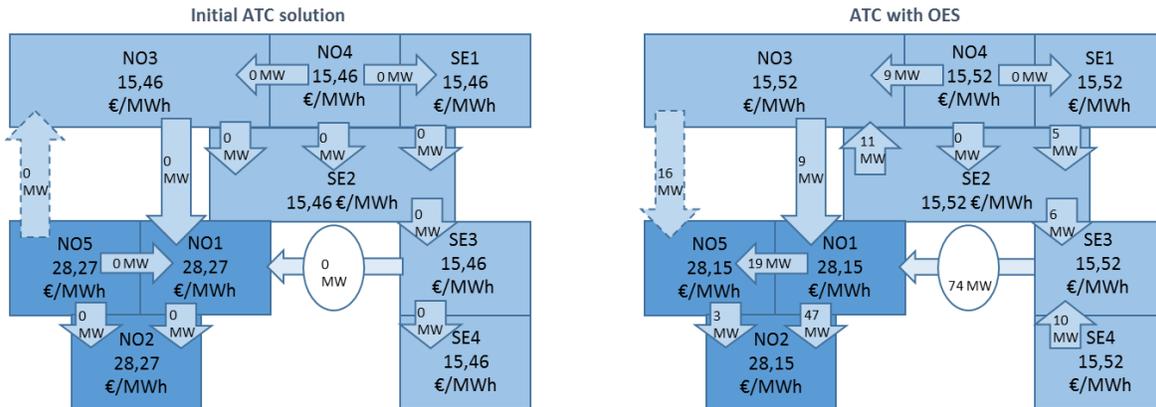


Figure 11-18 CNTC results for hour 4 on 25.12.2013. The prices are shown inside the boxes, and the colors indicate the price level. The physical flows resulting from the commercial exchanges are shown referenced to the initial market outcome.

The FB market solution for the same hour is shown below, in Figure 11-19. The flows are referenced to the same historical market outcome, and it's clear from the figures that there is no increased load on the line NO1-SE3, even though the market outcome has improved significantly in terms of socio-economic surplus. The improvement is due to a significant increase in the flow between the low-price areas (Sweden and Northern Norway) and the high-price areas (Southern Norway). FB manages to increase the flow on NO3-NO5 and NO3-NO1, while avoiding increased load on NO1-SE3, by increasing the NP in the north-west and reducing the NP in the south-east. The NPs in all areas are adjusted to maximize the flow into Southern Norway, and thus to create a better market outcome.

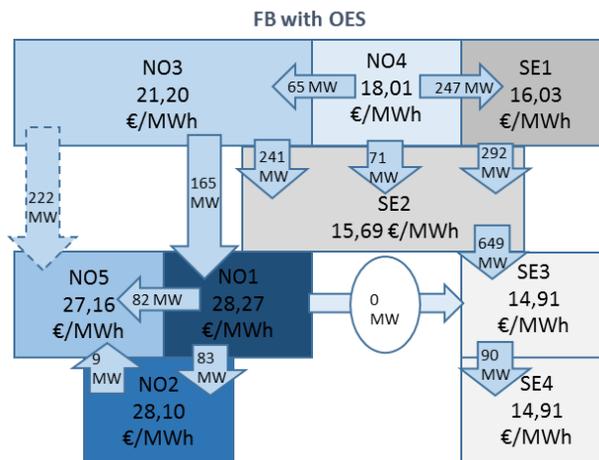


Figure 11-19 The prices are shown inside the boxes, and the colors indicate the price level. The physical flows resulting from the commercial exchange are shown referenced to the initial market outcome.



West-coast cut

The current congestion management routine for the West Coast Corridor (see Figure 11-20) is based on a pro-rata approach where the trading capacity is limited on relevant interconnectors, in order not to overload the West coast corridor. The trading capacity is limited in proportion to a pre-defined dimensioned capacity for each interconnection. Today the capacity is limited on the following interconnections:

- The Hasle interconnection to southern Norway (NO1)
- Konti-Skan to Western Denmark (DK1)
- The Zealand interconnection to Eastern Denmark (DK2)
- Baltic Cable to Germany (GER)
- SwePol Link to Poland (POL)
- NordBalt to Lithuania (LIT)

The West coast corridor

The West coast corridor is a section in the Swedish high voltage grid that cuts through three 400 kV lines in western Sweden, close to Gothenburg. During periods where there is import from Poland, Germany and Denmark, export to Norway and low load in the Gothenburg area, congestion can occur in the West coast corridor.

To ensure system security, i.e. transient stability and thermal capacity, the flow in the West coast corridor then may need to be limited in a northerly direction. These conditions occur mostly during nights and weekends due to the fact that the prices in Norway are higher than in Denmark and Germany (hydro storage vs. wind)

Compared to other corridors in the Swedish high voltage grid, the West coast corridor does not cut across the country from border to border. In addition, in the west coast corridor case it would not be possible to define an area with sufficient amount of controllable generation capacity. The absence of fast adjustable generation resources close to the west coast corridor implies that larger regulations must be activated in more distant locations. These measures are very inefficient as it has only a limited impact on the flow over the west coast corridor. Hence, it is difficult to treat this congestion with the same principles as for the rest of the corridors, i.e. bidding zones.

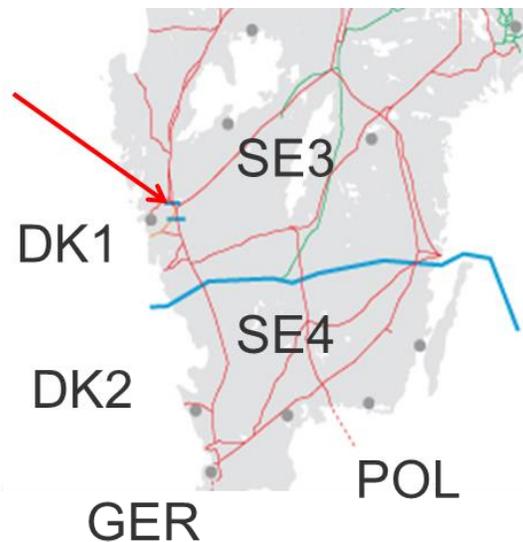


Figure 11-20 The arrow shows the location of the West coast corridor



How can FB capacity allocation improve the situation?

By applying FB capacity allocation to the West coast corridor the flexibility would increase. Instead of the TSO deciding ex ante how much each interconnector should be limited based on a pro rata principle (CNTC), it is the capacity allocation mechanism that manages the congestion on the West coast corridor while maximizing social welfare (FB). This means, that the flow between two bidding zones with a higher price difference, everything else being equal, would get priority over a flow between two bidding zones with a lower price difference.

The FB approach would also have a market outcome that better takes into account the real physical flows in the grid. By applying PTDFs to all bidding zones and DC interconnectors, the FB approach would take into account how an increased flow on a specific DC interconnector would impact the West coast corridor. Instead of treating all the flows as they would have the same impact on the West coast corridor, the market algorithm can allocate more capacity to bidding zones and DC interconnections with lower impact on the West coast corridor, and reduce the allocated capacity to the bidding zones and interconnections with the highest impact, if this increases the total social welfare.

Thus, the most efficient action can be used to reduce the flow on the West coast corridor.

In Table 11-1, the results are presented for an hour where the west coast corridor severely limited the import capacity on the interconnectors. In the table the available capacities in the NTC approach are presented.

Table 11-1 The available capacities on the interconnectors involved in the congestion management in the west coast corridor for hour 23-00 the 26th of December 2016. The max NTC are shown in the parenthesis.

2016-12-26 23:00	MW
DK2>SE4	61 (1700)
SE3>NO1	171 (2095)
DK1>SE3	27 (740)
PL>SE4	22 (600)
LT>SE4	25 (700)
DE>SE4	23 (615)

Figure 11-21 shows the result when the present congestion management method (NTC) and FB are used in the west coast corridor. In NTC, all bidding zones in Sweden, Finland, NO3 and NO4 get the same price, while the price is higher in NO1, NO2 and NO5 and lower in Denmark due to congestion. The available capacities on the interconnections to Southern Norway (NO1), Denmark (DK1 and DK2), Germany and Poland have been limited ex ante to manage the congestion in the West coast corridor.

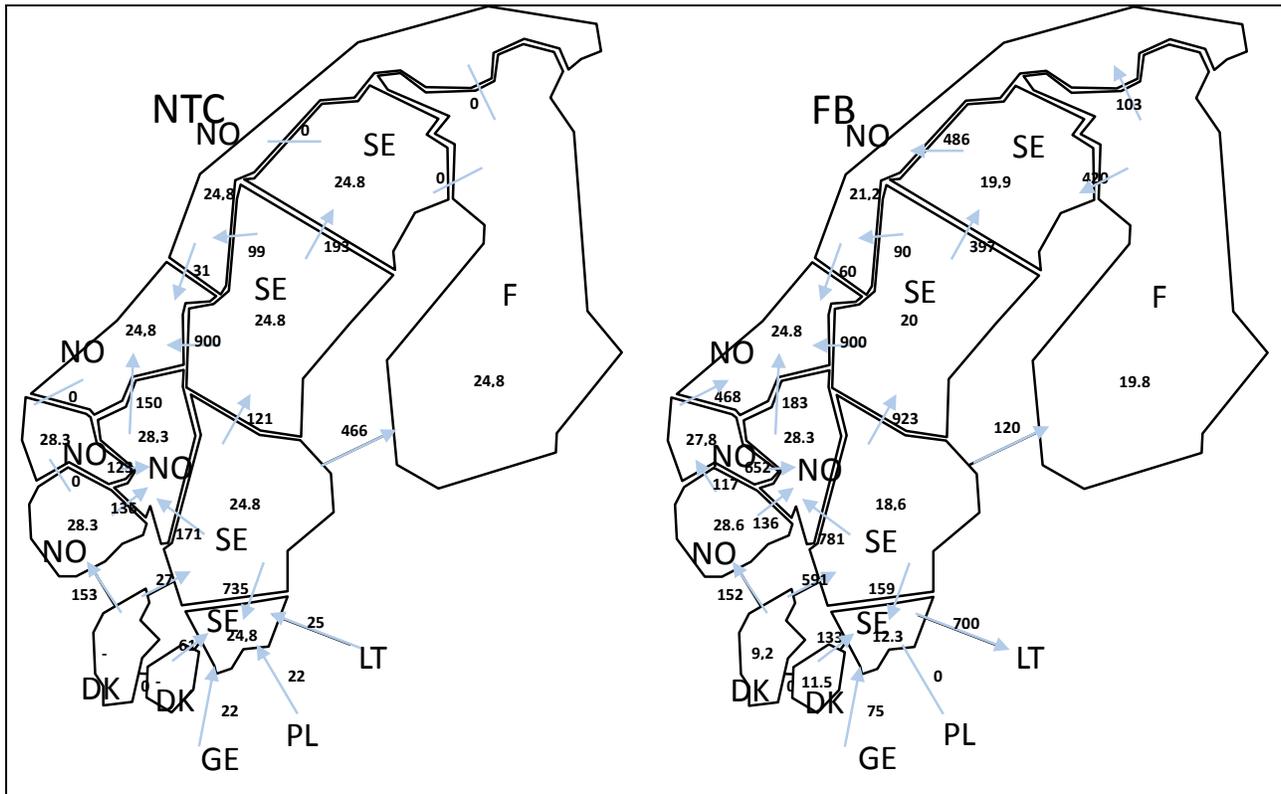


Figure 11-21 Management of congestion in the west coast corridor in NTC and FB. Results from hour 2016-12-26 23:00:00. Prices are shown in €/MWh and flows (arrows) are shown in MW.

In the FB solution there is no ex-ante capacity split between different interconnections. Instead, the market algorithm can choose to which interconnections the flow should be allocated based on the least generation cost for the whole system. Sweden gets a lower price compared to the CNTC solution in all zones, but now the prices differ between the bidding zones, see Figure 11-21. The flows from Denmark and Germany have increased and SE4 has an export flow on NordBalt. Denmark gets higher prices because of the increased export flows to Sweden.

11.2 Qualitative impact assessment

Implementing FB in the Nordic power system is a significant change in capacity calculation methodology compared to the current method of NTC. Therefore a qualitative impact assessment has been conducted on issues relevant for the market players in the Nordic power market. This chapter contains the outcome of this assessment. Each section starts out by defining and explaining the focus or the criteria to be used for the qualitative impact assessment.



11.2.1 Impact on other electricity markets

According to the CACM regulation, the FB approach should, if implemented, be applied in the Day-ahead and Intraday markets. Other electricity markets, i.e. the balancing market and financial market are not in the scope of FB implementation. The implementation of FB may, however, have some impact on the operations and the functioning of these markets since there is a close financial and physical link between them. Indeed, the day-ahead market is the main market for power trade and the outcome from the day-ahead market serves as input to the other markets.

Today the Nordic market for risk management (operated by Nasdaq) and the Nordic regulating power market (operated by the TSOs) are functioning highly efficient. In this section the impact in terms of mainly the efficient functioning of these markets, by implementing FB in the day ahead market, are assessed. Economic efficiency is defined and understood for each of the markets as the following:

Market for risk management:

- *Impact on the possibility for market players to forecast future System and spot prices.* The objective of the market for risk management is to hedge against future unexpected price volatility. The task is therefore to assess, whether market players are able to do a proper assessment of the future prices by implementing FB in the day ahead market. Or put more concretely, to forecast the future average marginal cost for a given period (month, quarters, years). In addition; the need for forecasting prices are also used by hydro producers to calculate the water value of the storage.

Regulating power market:

- *Impact on the dispatch of up and down regulation of generators.* When doing regulation the criteria for efficient up-regulation is to ramp up generators (down-regulate consumption) by the use of the cheapest sources, given the grid constraints and for down-regulation to ramp down the most expensive generators (low value consumption), given the grid constraints. The question to answer is therefore whether FB in the day ahead market distort the possibility for efficient regulation.

11.2.2 Nordic electricity market for risk management (hedging of market risk)

Risk management in the Nordic market is performed by utilizing two kinds of instruments, a system price future and a spot price future. The spot price future or Electricity Price Area Differential (EPAD) is to hedge an unexpected future difference between the system price and the spot price. These instruments are traded through Nasdaq OMX with a time horizon up to ten years. Assessing the impact on pricing of these instruments by FB has to be done assessing how the new management of grid constraints and flow (NTC→FB) may impact the transparency, hence impacting the possibility of put a “true” value on a future system price/spot price.



The Nordic system price is calculated assuming that there are no transmission constraints between the bidding zones in the Nordic area. The market coupling results, e.g. the net positions and flows between bidding zones, between FB and NTC may differ due to a different way of allocating capacity. The flows from the market coupling between the Nordic area and the CWE region are used as an input in the system price calculation. This is managed by inserting the volume of the flow as price independent purchase or sell order, depending on the flow direction. Baltic countries and Poland are configured as one zone each and the same limitations as in the market coupling are used. The main principles for calculation would as such remain the same regardless of FB or (C)NTC. However, the system price may be affected due to a different exchange in the FB solution and the NTC solution between the Nordics and continental Europe and the Baltic countries.

For the forecasting of system price futures it is concluded that implementing FB does not have any impact on transparency on forecasting as the grid constraints in the Nordic power system does not have any impact on the system price. However, FB might provide more capacity on the interconnectors between the Nordic CCR and Core CCR, hence it might have an impact on price level compared to a reference of CNTC, but not on the ability of market players to do a forecasting of the future system price. The impact from external interconnectors on the future system price cannot be expected to be more difficult to assess compared to today's situation.

For the forecasting of spot prices or bidding zone price it is concluded that FB probably will have an impact on the price level of some bidding zones (otherwise the increase in welfare by FB will not exist), but the ability to forecast the future spot is not expected to change significantly. The price of an EPAD is based on expectation of the marginal cost of the marginal generator, averaged over a given period, in a given bidding zone. The FB approach is another method for including grid constraints and solving congestions in the grid, compared to the NTC method. The FB market simulations have shown that price differences occur more frequently, although the magnitudes of these differences often are small. In the light of these changes, the market participants' bidding behavior in the day-ahead market may change and have an impact on area prices and the prices of Electricity Price Area Differentials (EPADs).

The task for the market players (as it is today) is to forecast the net position of the bidding zone, in order to identify the marginal generator. For that reason and to comply with CACM article 20.9, the TSOs will provide a tool that enables market participants to evaluate the interaction between cross-zonal capacities and cross-zonal exchanges between bidding zones. A draft version of such a tool has been provided by the Nordic TSO called the Stakeholder Information Tool¹⁶.

In the Nordic market, there is also Physical Transmission Rights (PTR) available for hedging of price differences between the two Danish-German borders and the internal border between West- and East

¹⁶ See also section 11.2.7.



Denmark (The Great Belt). The holder of a PTR can choose to nominate (use) the capacity or to reallocate(sell) the capacity to the day-ahead market.

If the holder nominates the PTR it will be taken into account according to the description in the section 6.1.4. When market coupling exists it is never an advantage to nominate the PTR, thus the nomination possibility is more or less theoretical.

If the capacity is reallocated to the day-ahead market, the PTR holder will be remunerated in accordance with the Harmonized Allocation Rules¹⁷.

11.2.3 The Balancing market

In this section, we describe the impact on the balancing market by introducing FB in DA market. As mentioned in the introduction, the Nordic balancing market will not be in scope for the implementation of FB. This implies that the basic fundamentals of the balancing market will be the same as today, i.e. an NTC like method will be used as capacity calculation method regardless of the chosen method in DA (FB or C-NTC). The capacity calculation will remain as today where the operators in the control centers will continue to assess the available capacity in the grid based on the grid utilization. The Total Transfer Capacity may differ from DA and ID since the conditions may have changed between forecast and operational hour. The operational staff will continue to monitor that the capacity limits are not exceeded and in case that occurs market splitting in the balancing market or counter trade measures are used.

The implementation of FB may, however, have some impact on the pricing principles in the balancing market since there is a close financial and physical link between the DA and ID market and the balancing market. In the balancing market, the day-ahead bidding zone prices are used as reference for the prices in the balancing market. In the present NTC system, two bidding zones get the same price when there is no congestion between them. If congestion occurs between bidding zones it leads to different prices in the bidding zones. The up-regulation price cannot be lower than the DA area price (the bid can be lower but will be adjusted) and the down-regulation price cannot be higher than the DA area price (the bid can be higher but will be adjusted). Special regulations are used to manage bottlenecks in the transmission network within bidding zones or to guarantee the allocated capacity. These measures do not have a direct impact on the balancing price as they are settled as bilateral trade between the TSO and asset owner.

The balancing market doesn't rely on the same capacity calculation method as applied for the DA and the ID time frame. The TSOs are obliged to operate the power system in a secure manner and this is fulfilled by performing capacity calculation when needed. This means that the results of capacity

¹⁷ According to the Forward Capacity Allocation Regulation, all TSOs have to deliver a set of Harmonised Allocation Rules (HAR) for long-term transmission rights.



calculation can change for each market time frame and that there may still be capacity to use for balancing regulations although all available transmission capacity provided to the DA and ID time frame has been allocated.

The main differences between FB and (C)NTC for the balancing market, is the potential more frequently occurrence of non-intuitive flows from a high-price to low-price area, and that two areas can have different prices although the capacity between them are not fully utilized in FB. This may have an impact on the pricing principles of the adverse imbalance flow as well as how the power system is operated, as explained below.

Impact on pricing principles in the Balancing market

If FB is implemented in the day-ahead market, some of the principles that are in place today need to change, e.g. there may be different regulation “reference” prices in two bidding zones although there is no congested critical network element on the border between them, but instead somewhere else in the Nordic grid. The different “reference” regulation prices depend on that the areas have a different impact on the critical network element. This is illustrated in the simplified example in Figure 11-22, and it will be explained how this leads to a situation where cheaper bids cannot be activated.

In the example, we have a congested grid constraint in SE3 and a market-induced congestion, i.e. price difference between SE1 and SE2. There is no congested critical network element between SE1 and SE2 in the DA market, but SE1 and SE2 have a different impact on the grid constraint, which leads to different area prices.

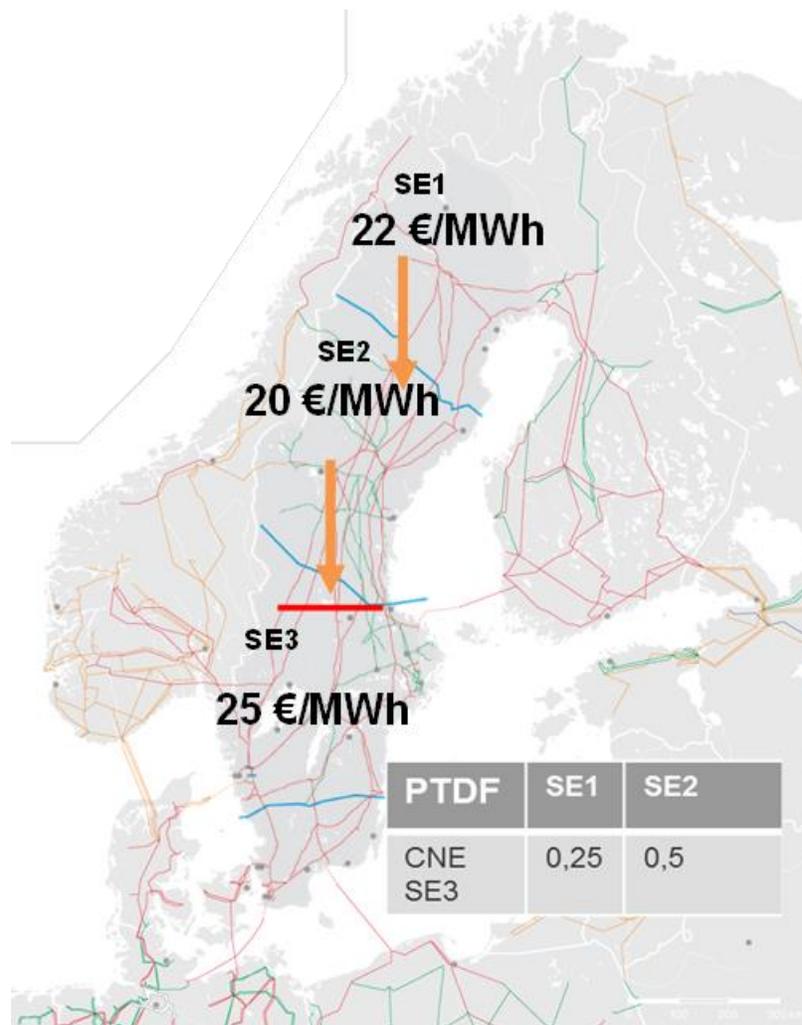


Figure 11-22 Example of impact on balancing pricing principles

If the system is in balance, the imbalances in each bidding zone will be settled on the reference price, i.e. Day-ahead price if the system is balanced. If changes in the system between DA and balancing market relieve the congestion on the grid constraint, SE1, SE2 and SE3 will get the same regulation price. All the bids are merged into the same merit order list and can be activated based on price. The bids in each bidding zone are adjusted in line with current pricing principles. This implies that the up-regulation price cannot be lower than the DA area price (the bid can be lower but will be adjusted) and the down-regulation price cannot be higher than the DA area price (the bid can be higher but will be adjusted).

If we assume that the system is under balanced (production shortage) and we need to activate up-regulation bids in order to balance the system. In Table 11-2 we show the available bids.



Table 11-2 Available balancing regulation bids

Bidding zone	Available up-regulation bids
SE1	23 €/MWh
SE2	21 €/MWh

The same grid constraint that is congested in the DA market coupling is congested in real time and there is no congested critical network element between SE1 and SE2. If SE2 is under balanced, a regulation can take place in SE2 to the price of 21 €/MWh, i.e. SE2 gets up regulation price (21 €/MWh) and SE1 gets 22 €/MWh (in balance and reference price from DA used) even though cut 1 is not fully utilized. If SE1 is under balanced, a regulation cannot take place in SE2. Instead a more expensive regulation is activated in SE1 instead of the cheaper bid in SE2.

In the current NTC market SE1 and SE2 would - in this specific case - get the same price in the DA market since there is no congestion between SE1 and SE2. The price in SE3 may be higher in CNTC than in FB. For the balancing market it means that the TSO could choose whether to activate the bid in SE1 or the bid in SE2. When activating the bid the TSO needs to take into consideration that this activation does not cause overloads in other parts of the Nordic system.

Operational tools

In the light of a more detailed capacity calculation method that has a resolution on individual grid constraint level, there may also be a need for operational tools that can monitor how potential activation of location specific bids in the balancing market affect individual grid constraints. This may be required as two bids in the same bidding zone may have a different impact on the critical grid constraint. The risk is otherwise that the activated balancing regulations need to be supplemented with additional remedial actions in order to manage the congestions created by the activation of bids in the balancing market.

11.2.4 Bidding zone delimitation

This chapter describes the potential impact of choosing a flow-based approach on the Nordic bidding zone delineation. As described above, FB differs from CNTC by the explicit use of PTFDs in the price/quantity calculation at the PX: FB interlinks the contractual path to the physical path. In this way all commercial exchanges – that are subject to the allocation mechanism - compete for the scarce capacity in the AC grid. As it is the bidding zone definition that defines which exchanges are subject to the allocation mechanism, the interlink between the two topics “bidding zone delineation” and “FB” surfaces. In this section it will firstly, by the use of a generic model, be shown that, while implementing a flow based capacity calculation method does not necessarily require to change the number - or delineation - of bidding zones, it might in some cases be beneficial to do so in order to increase the



overall socioeconomic welfare in the region. Secondly, some reflections will be provided on the question to what extent the observations made for the generic model are applicable to the Nordic region.

Why FB implementation might alter bidding zone configuration

In FB, exchanges that are subject to the allocation mechanism are all competing for the scarce capacity made available within the allocation mechanism. Exchanges that are outside the allocation mechanism are all exchanges of which the impact is taken into account before the allocation mechanism itself, i.e. exchanges that can be said to enjoy a 'priority access' and that are exempted from the competition element within the allocation mechanism.

Consider the example in Figure 11-23, where the surplus and shortage areas are indicated, and a commercial exchange internally in bidding zone C (and therefore not subject to an allocation mechanism), and one between bidding zones A and B, and their physical flows are depicted. Some of the physical flow, induced by the commercial exchange within bidding zone C, might – due to the Kirchoff's law of physics – take a detour through the networks of bidding zones A and B. This is illustrated in Figure 11-23, where the yellow arrows correspond to flows that are caused by exchanges that are not subject to an allocation mechanism (unallocated flows). The grey arrows correspond to flows that are caused by exchanges that are subject to an allocation mechanism (allocated flows).

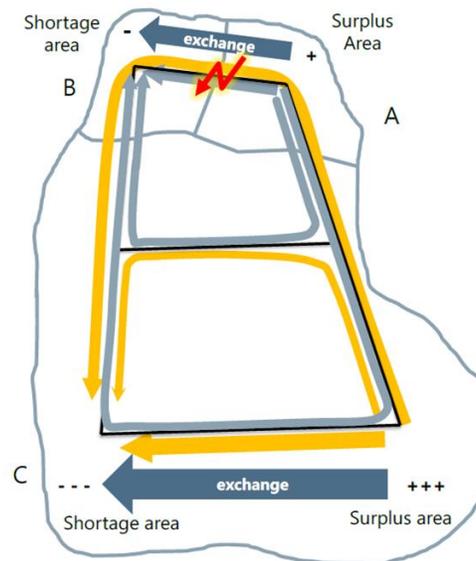


Figure 11-23 Non-allocated flows (yellow arrows) resulting from an internal exchange in bidding zone C

The example in Figure 11-23 shows that the flows resulting from the commercial exchanges (the thick blue arrows, labeled with 'exchange') would lead to a congested situation on the border between the two zones A and B. As such, this situation is not a feasible one. In the (coordinated) FB capacity



calculation stage of this three-zone region, the flows that result from all unallocated exchanges, i.e. the exchanges that are not subject to the regional allocation mechanism, are forecasted (in the common grid model) in order to assess the capacity that can be given to the allocation mechanism and used by the market. The exchange within zone C is an intrazonal one, and is not subject to the allocation mechanism. This means that in the capacity calculation stage, the (forecasted) impact of this exchange needs to be taken into account. As such, the flows resulting from this intrazonal exchange receive a priority access to the grid and reduce the capacity available on the border between A and B that can be given to the allocation mechanism. The exchange between zone A and B is subject to the regional allocation mechanism. It is this exchange that will be reduced in order to prevent the congestion on the border between A and B.

When in country C a new bidding zone would be introduced, zone D, which separates the source and the sink of the former intrazonal exchange within zone C, the former unallocated exchange is turned into an allocated one as it is made subject to the regional FB allocation mechanism, as shown in Figure 11-24.

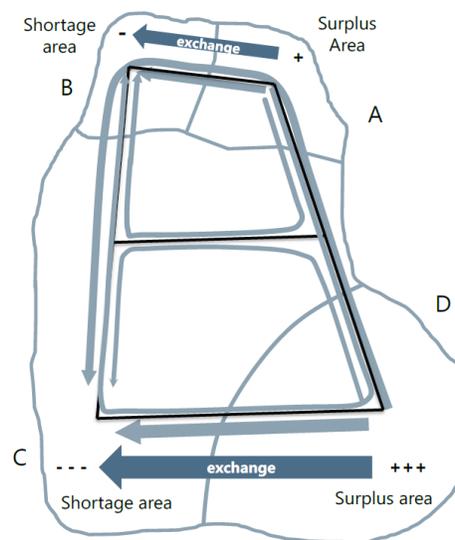


Figure 11-24 The unallocated flows in Figure 11-23 (yellow arrows) have been translated into allocated flows (grey arrows) by splitting the former bidding zone C into two bidding zones: C and D.C

In this situation, both the exchanges between zone A and B, and between zone D and C compete with one another to make use of the scarce capacity on the border between zone A and B, that is expressed by a FB constraint that for example may look as follows: $\text{Induced flow} = 0.6 \cdot \text{NetPosition}(A) - 0.6 \cdot \text{NetPosition}(B) + 0.3 \cdot \text{NetPosition}(D) - 0.3 \cdot \text{NetPosition}(C) \leq 1000 \text{ MW}$. This formula illustrates that all exchanges within the allocation region compete for the scarce capacity as the NetPositions are defined by the net exchanges of the bidding zones. It is now an outcome of the regional Day-Ahead



market welfare optimization, i.e. a market driven mechanism, which exchange will be reduced and to what extent. In principle both exchanges might be reduced in order to prevent the congestion on the border between A and B.

Note that in an NTC allocation mechanism the situation would not by definition be solved by introducing the new bidding zone D. Given the fact that zone C was one single bidding zone, that could handle the large intrazonal exchange without any problems, the NTC between zones C and D might be so large, that it does not limit the exchange between C and D. Indeed, it is then the NTC between A and B that should be reduced in the capacity calculation stage to prevent the congestion on the border between A and B. Anyhow, this decision is not market driven and does not by definition lead to the most efficient solution.

The intention of the fictive example above is to illustrate that bidding zone delimitation provides an instrument to make exchanges subject to an allocation mechanism. In combination with a FB capacity calculation and allocation mechanism, where all exchanges that are subject to the allocation mechanism compete with one another to make use of the scarce capacity, an efficient allocation can be achieved.

Can implementation of FB be expected to have an impact on the Nordic BZ delineation?

Regardless of which capacity calculation methodology that is chosen in the Nordic CCR, the bidding zone configuration may need a review but this will in that case be triggered in accordance with the provisions in the CACM regulation and not only be dependent on the implementation of a new capacity calculation methodology. One of the major differences between (C)NTC and FB is the ability to include internal constraints directly in the capacity allocation. In FB, in difference to the CNTC approach, these constraints can be included directly as critical network elements in the capacity allocation, if they are significantly impacted by cross-border trade. If FB is implemented, it will provide more detailed information, such as shadow prices, and which critical network elements are (most) limiting the market. This information may be useful when answering the question how the bidding zones should be configured.

The Nordic system already has – especially in the meshed part of the Nordic grid – multiple, comparably-sized, bidding zones. As such, the reasoning that we followed in the generic example above, is not automatically applicable to the Nordics. This is demonstrated in the following reasoning. The FB capacity calculation is based on a common grid model. In this common grid model, the expected situation for the respective hour of Day D is reflected, including the generation and consumption in the different bidding zones. As explained in Section 6.1.2, the flows on the grid constraints are taken from the grid model (F_{ref}) and translated into the F_{ref}' , being the flows on the grid constraints when all bidding zones have a zero net position, by means of the PTDFs. In Figure 11-25, the flows on the AC borders in the Nordic grid are shown when all bidding zones have a zero net position. As expected, the non-allocated flows on the AC borders are not zero. Nevertheless, their relative values – meaning the amount of non-allocated flow in relation to the total capacity of the border - seem to be limited to 20% (with an exception to the FIN-NO4 border), and do not provide a direct reason to reconsider the bidding zones.

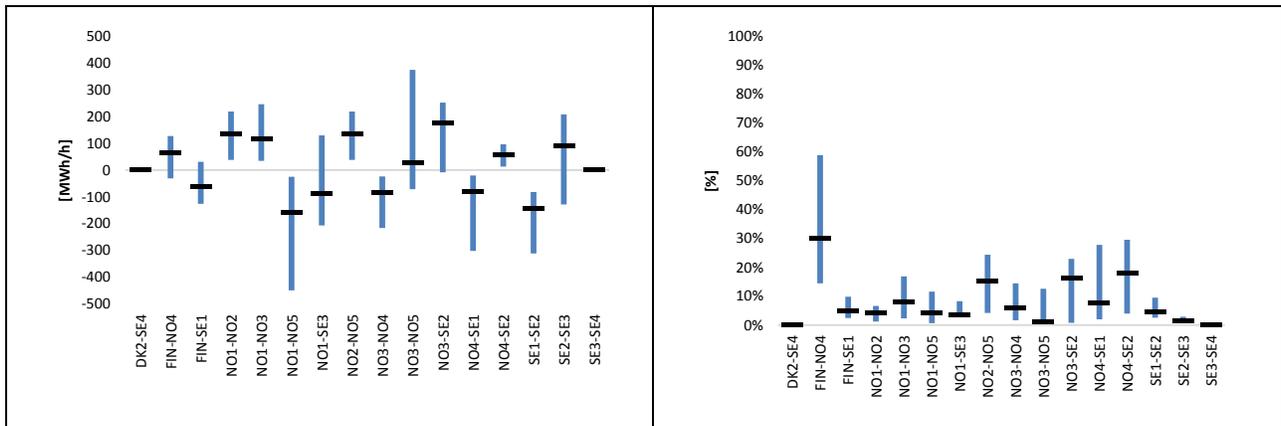


Figure 11-25 Estimated non-allocated flows at the Nordic AC bidding zone borders in week 52, 2017 in MWh and % of capacity

11.2.5 Non-intuitive flows

This chapter describes non-intuitive flows and the price formation that might happen in FB. In FB, flows from a high price area to a low price area, so called non-intuitive flows, occur more often compared to NTC and CNTC in the results from the market coupling algorithm. The market coupling algorithm aims to maximize the social welfare over the whole system. Non-intuitive flows relieve the congestion on the constrained grid element and enable more flows between other bidding zones, that brings more social welfare to the whole system welfare compared to a situation where they are not allowed. With CNTC constraints, the market coupling algorithm cannot take into account how trades in all bidding zones affect the critical network elements. It is only the two concerned bidding zones with the interconnection that can have an impact on the flow on the border. With FB constraints the market coupling algorithm allows all transactions to compete for the scarce capacity on the critical network elements. How the transactions affect the critical network element is shown by the PTDF-matrix.

There exist the possibility of not allowing for non-intuitive flows when calculating prices and volumes in the Euphemia market algorithm. This is currently at work in CWE. This may create more simple and intuitive understandable market outcome, but is at the expense of the social welfare. Below is illustrated, by the use of a small Excel model, how the non-intuitive could be understood and the resulting social loss from not having non-intuitive flow. FB intuitive shares some similarities with CNTC, hence CNTC is used as a proxy for FB intuitive, as the Excel model do not facilitate FB intuitive.

One key point to understand on non-intuitive flows, is that basically it is not a flow from high price bidding zone to low price bidding, it is actually a flow starting in a bidding zone with an even lower price than the low price zone, that takes a “detour” through the high price bidding and ends in the medium price bidding zone. We show this key point in the example below. We will illustrate the non-intuitive market outcome together with one possible CNTC market outcome, i.e. the outcome if FB is not



implemented, but only CNTC. The grid and the bid curves are inputs to the market clearing, these are shown below in Figure 11-26.

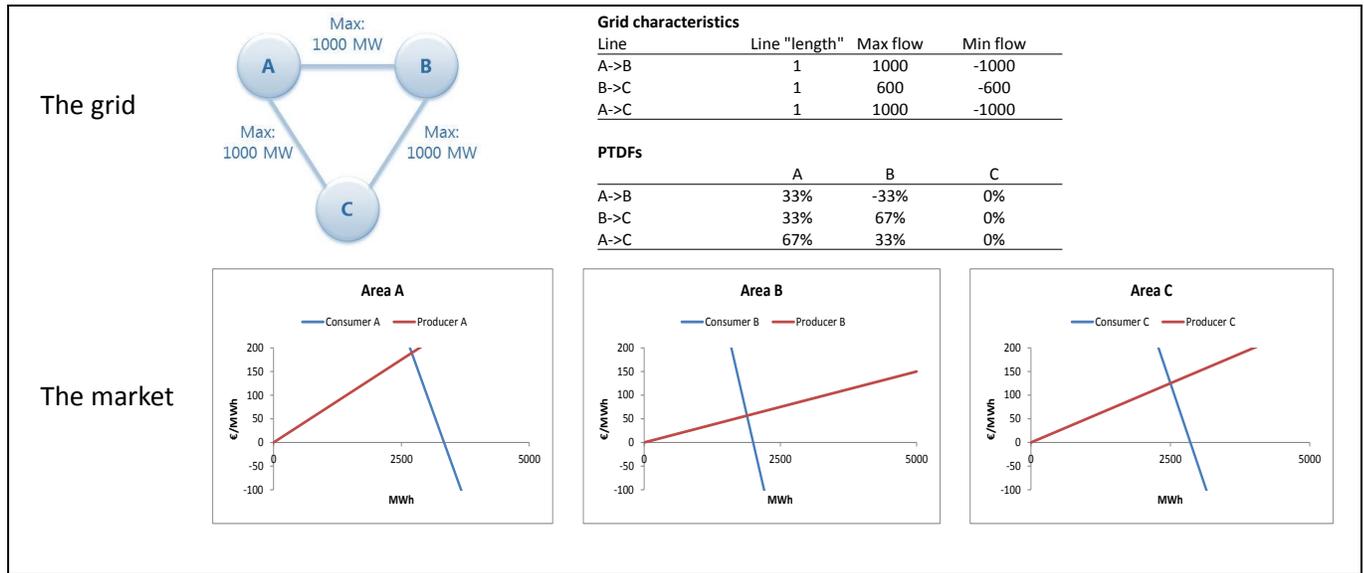


Figure 11-26 the grid and the market. The bid curves show an equilibrium before capacities have been taken into consideration

Based on the grid typology the FB and CNTC capacities are illustrated in Figure 11-27. Please note that the CNTC domain is only one of several possible within the safe/secure domain.

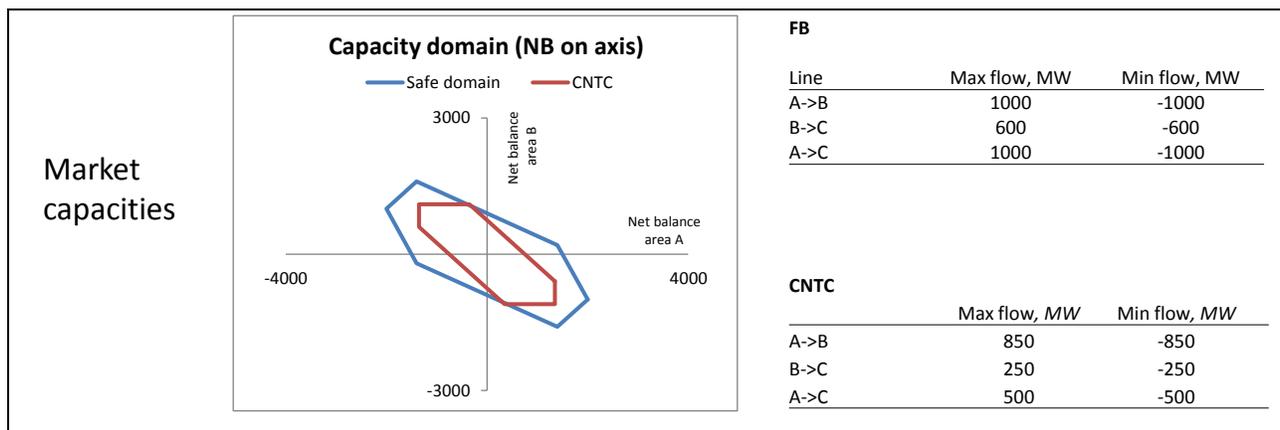


Figure 11-27 Market capacities. Market capacities are chosen for the sake of the example.



Calculation of prices and flows both in CNTC and FB situations reveals a non-intuitive flow of 400 MWh, going from high price zone C to low price zone A, cf. left side of Figure 11-28.

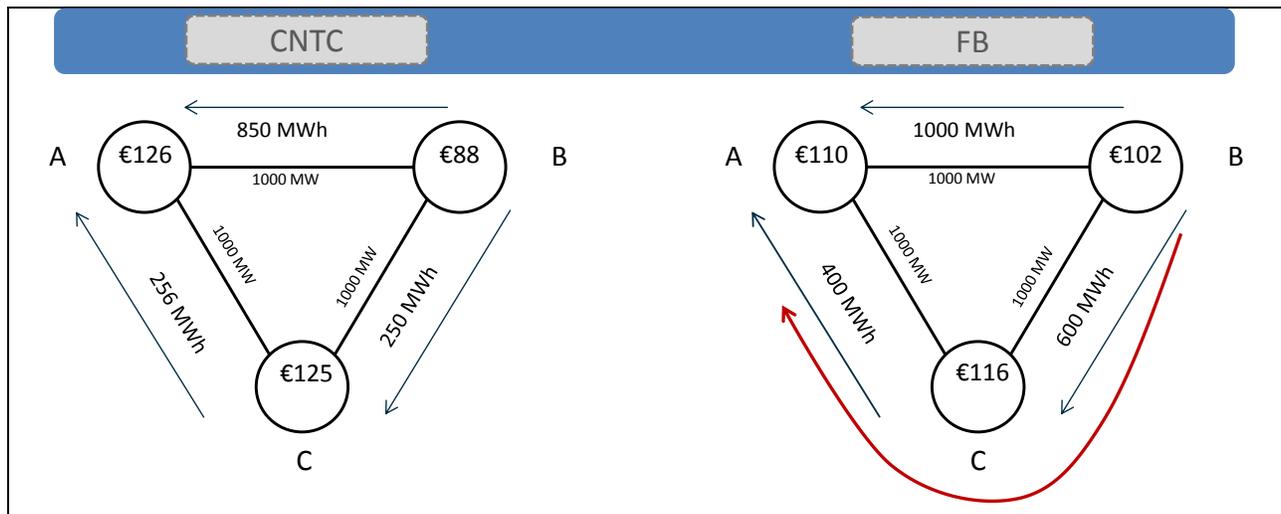


Figure 11-28 Market outcome using FB and CNTC capacities. The calculation has been done in excel. The excel sheet can be provided by request.

In reality this is not a non-intuitive flow, hence in reality the flow starts in zone B, which is a bidding zone with an even lower price than A. The red arrow illustrates this. If the market should instead be managed by CNTC, the market outcome would be as illustrated in the left side. It can be seen that the flows from the low price bidding zone, B, is lower compared to FB, hence this is an indication of lower welfare.

11.2.6 Congestion income distribution

Congestions in the electricity grid generates congestion income (CI) to the TSOs. Congestions generate spot price differences which, multiplied by the day ahead flow across the congested interconnector, gives the CI. Today the CI is shared among the TSO typically in accordance with ownership of the particular interconnector and often based on a sharing key of 50/50.

Several characteristics of the FB approach make it necessary, not only to use the default sharing (50/50) of the CI but to develop specific sharing keys. The main difference using a Flow-Based approach is, that non-intuitive flows (going from a higher-price area to a lower-price area) not just happen in rare cases¹⁸

¹⁸ Where ramping requirements slow down the optimal distribution of power.



but happen more often in order to maximize the total economic surplus for the whole region. Also cross-border capacities are not as fixed in FB as in a NTC setup which must be considered when LTTRs are issued. This chapter describes two main issues of the flow-based approach:

- What happens with the Congestion Income on borders where there is a non-intuitive flow?
- How are Long Term Transmission Rights (LTTR) handled in a flow-based setup?

A first suggestion of how the above items can be handled is presented.

Avoidance of non-intuitive flows

Market algorithms, using a flow-based approach, result from time to time in solutions where the flow on some borders are going from the higher price area to the lower price area. Flow-based algorithms allow these “non-intuitive” flows in cases where they allow higher total socioeconomic benefits for the whole system. At the specific borders however, where non-intuitive flows occur, negative CI is generated. This would cause a loss for the TSOs at both sides of these borders. Three different options of handling this are possible:

- Do nothing. The TSOs of both sides of a border with a non-intuitive flow take the loss.
- Avoid non-intuitive flows. Prevent the market algorithm from finding solutions with non-intuitive flows.
- Compensate negative congestion income by taking a little share of all the other borders, where a positive CI is generated.

The first option would be the easiest one to implement but would also not be fair – to have some TSOs pay for the overall increased regional benefits. The second option would also be easy to implement but the maximum feasible socioeconomic welfare would not be achieved. The last option requires a slightly more complicated calculation of the CI per border. It allows however to find a market clearing solution with optimal socioeconomic welfare while, at the same time, no borders generate negative CI.

If the third option is chosen, the following generic approach can be used:

1. Calculate the total CI of the region for a specific hour
The total CI of the region is the sum of all border flows multiplied with the price difference of the two bidding zones connected by each border.
2. Calculate the adjusted CI for each border
Some borders might, in a flow-based setup, give a negative CI which will reduce the total CI. However, non-intuitive flows are still optimizing the total CI of the region. Therefore negative CIs will be adjusted so that there are no losses for the TSOs on the affected borders. The adjustments will be paid by reducing the CI on the other borders.
3. Distribute the adjusted CI of each border to the right receivers
Typically 50/50 to the TSOs on both ends of the border. Other, specific agreements might however be made for some borders.

The total Congestion Income of a region is calculated by the following equation:



$$CI = \sum_{i=1}^{NB} F_i \cdot |\Delta CPB_i| \quad (17)$$

Where:

- NB: total number of internal borders in the region
- F_i : flow at border i in the direction from low price area to high price area
- ΔCPB_i : delta clearing price between the two areas connected to border i

The adjusted Congestion Income on each border can be calculated by assigning a part of the above calculated total regional CI to each border.

Example

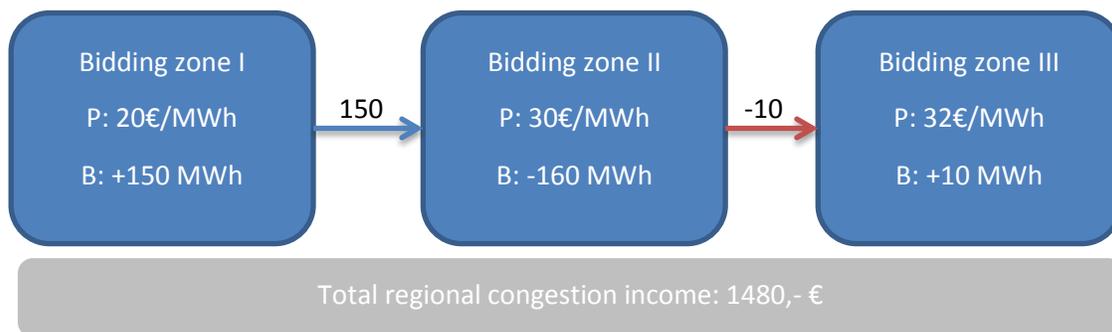


Figure 11-29 Example 1 – Calculation of regional congestion income

Handling of Long Term Transmission Rights (LTTR)

The European Guideline for Forward Capacity Allocation (FCA) states, that TSOs must make sure “[...] that other long-term cross-zonal hedging products are made available to support the functioning of wholesale electricity markets.” Currently LTTRs are only offered on one border of the Nordic CCR. This might however change in the future and therefore one possible approach of how LTTRs could be handled is explained below. Once a specific approach is chosen, it might be necessary to investigate additional details (like handling of LTTRs on external borders).

One question that must be answered in relation to the congestion income distribution methodology (CID), cf. FCA article 57 is whether the LTTR remuneration to the LTTR holder simply can be calculated by price difference multiplied by flow on a border or should the LTTR contribute to cover negative CI on borders with non-intuitive flows before remuneration.



11.2.7 Transparency

In this section an assessment is provided of implementing FB in terms of transparency of the grid constraints (and changes here in) and hence the link to the power price formation. Firstly it is described how an implementation of FB may be perceived to decrease simplicity / increase complexity due to the more detailed FB grid constraints, while - at the same time - increasing transparency as the FB constraints are not aggregated to one single value on bidding zone borders and are directly represented in the price calculation performed at the Market Coupling Operator (MCO). Secondly it is described how to cope with the challenges foreseen by having this higher complexity.

Up until now NTC values have secured a transparent Nordic power market where the link between capacities, flows and prices are easy to understand. As such, the NTC values are in the minds of the people active in this market, from the operators at the TSOs that are actually performing the capacity calculation, to the market participants that are placing the bids on the day-ahead market, and the NRAs. Nordic stakeholders are used to the values and, as such, they can easily be interpreted. With the introduction of a coordinated – and more formalized - capacity calculation methodology, that is based on a common grid model, a change compared to today’s NTC values will be introduced. In the case of the CNTC methodology, although the cross-border capacity values are published in the same format, the values are likely to change, as is the reliability margin. Under a FB capacity calculation, the cross-border capacity values will be published in a different format compared to today. Under FB, the capacity constraints are not only located on bidding zone borders, but can also be within the bidding zone, while the capacity (the RAM) will vary hour by hour, in line with the loading and usage of the grid. In addition, the FB methodology provides PTFD matrices, which indicate the impact of a change in bidding zone net positions on the grid constraints. This concept is rather new and is to be used explicitly in the price calculation, where today this is used “behind the curtains” by the TSO operators. As such, FB increases the transparency, as the market players are no longer exposed to the TSO operators’ subjective assessment on the (C)NTC domain, which is not visible to the market players. Indeed, in (C)NTC the TSO operators may have to decide between several NTC domains within the secure domain, as shown in Figure 11-30, which under FB is left to the market players.

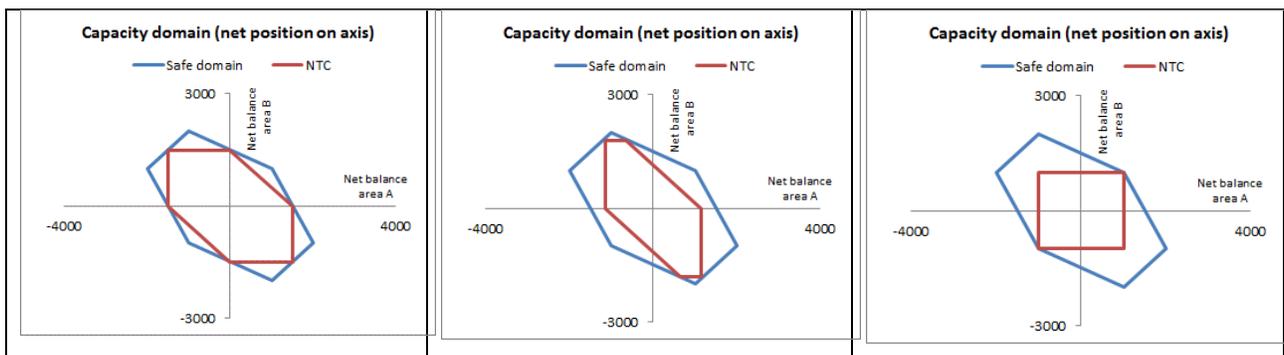


Figure 11-30 More NTC domains are possible within the secured domain



On a high-level, one can say that the more detailed the approach, the more *information* it contains and the more transparent it gets: less aggregation is required, and the number of assumptions reduces. In the case of a CTNC and FB approach, we can clearly see a level of aggregation in the CNTC approach that is not required in the FB approach. In the CNTC approach, the capacity calculation boils down into one ‘aggregated’ value between two bidding zones, that puts a limit on the commercial exchange between the two bidding zones. With each aggregation made, grid details and a link with the physical reality are lost. In this sense, the FB approach is a step forward in terms of transparency. Individual grid elements are taken into account as such, whether they are tie lines or lines that are located within the bidding zone. This level of transparency brings many advantages, especially linked to the discussion on bidding zone delineation and the notion of “moving internal congestions to the border”. It is this level of transparency that is actually required to properly assess the hot spots in the grid, being those cuts or grid elements that are limiting the Nordic power market on a regular base and with a social welfare loss tagged to it. In FB, it is the shadow prices of those individual grid element and cuts that are computed and available with an hourly resolution: a valuable source of information for both TSOs and NRAs.

The Nordic TSOs do, however, acknowledge that understanding the FB methodology and the impact thereof needs some training. The TSOs have therefore started some initiatives aiming at enhancing the understanding among stakeholders before go live with FB. These are described below.

Stakeholder dialogue. In order to facilitate this dialogue, the Nordic TSOs have established two different settings to meet and discuss questions related to the capacity calculation methodologies. In the Stakeholder Forum, all stakeholders are welcome to join the meetings. The other setting for stakeholder dialogue is the Stakeholder Group meeting, where the industry organizations, national regulatory authorities, and power exchanges have nominated representatives that meet and discuss issues together with representatives from the Nordic TSOs. This smaller setting allows for more intense and in-depth discussions. Post submitting the CCM proposal (September 2017) and before the parallel run will start, the Nordic TSO will initiate a dedicated work together with the market players, with the objective of identifying:

- The need for information and transparency of FB parameters by market players
- How much transparency on FB parameters can be provided on a daily basis – legal barriers or cost of providing information may be an challenge
- What kind of tool is needed and to what degree can the TSO provide this tool (assuming minimum requirement cf. CACM is fulfilled)

Stakeholder information platform. The TSOs have also established a stakeholder information platform where materials are uploaded and where the stakeholders can post questions regarding the capacity calculation methodologies. In addition, the Nordic TSOs also issue newsletters in order to keep the stakeholders up to date with regard to the Nordic capacity calculation methodology developments.



Parallel run. As the implementation of FB introduces market constraints in a different format than what is used today, whereas the CNTC is likely to introduce different values than today's ones, an (at least) six-month parallel run period will be performed on a daily basis by using the industrial tools and a close-to-operational process. While the current NTC mechanism is in operation to serve the day-ahead market, the TSOs run a second capacity calculation in parallel, being FB, in order to assess what would have been the capacity if the coordinated capacity calculation approach would have been applied. In addition, the actual order books at the PXs will be used to assess what would have been the market outcome in this case. This is a learning period for TSOs, NRAs, and market actors. After this period of parallel run, the new capacity calculation and allocation mechanism should have started to root in the minds and the IT systems, ready to step into this next evolution of the Nordic power market. Indeed, the objective of the parallel run is twofold:

- provide comfort to stakeholders
- secure a proper operation of the power market and power system for both TSOs and market participants

For stakeholders to get acquainted with the new FB methodology, the Nordic TSOs are planning to share the results of their FB capacity calculation and market simulations already well before the abovementioned parallel run, though these "parallel runs" are not based on industrial tools nor on close-to-operational processes.

11.2.8 Long-term investment decisions

In this chapter we describe how the long-term investment analysis might be impacted when choosing FB as the capacity calculation methodology in the Nordic CCR.

One of the advantages of employing FB is that the capacity utilization of lines can potentially be increased, hence providing more capacity without any grid investments. Not only in operation, but also in the grid planning and investment analysis phase, implementing FB may have an impact. Using the FB algorithm to study grid constraints might give a more precise result on which grid constraints are limiting the market flows, and this can give a more direct indication on where constraints and bottlenecks might occur, as compared to the CNTC methodology. Therefore it could potentially also show limitations that one might not have found without an in-depth analysis.

One piece of new information that FB in operation reveals, is the (true) costs of grid constraints. This is called the shadow price of capacity. The shadow price shows the market value of an incremental MW of capacity on that specific grid constraint. This too can be used for a first screening of grid constraints that are in need of investments. Shadow prices do emerge today as the price difference between bidding zones reveals the need for more capacity. However, due to (C)NTC potentially not reflecting true physics, this information might be a bit misleading, e.g. the true grid constraint is often not located at the bidding zone border, but within the bidding zone. Below an explanation is provided on the shadow prices under FB.



Shadow prices are computed finding the solution to any constrained optimization problem. It is relevant to compute as it indicates where to increase capacity with a maximum socioeconomic impact. Shadow prices in the CNTC model represent the effect on market welfare of a marginal increase of CNTC values, which is equivalent to the resulting price difference between the bidding areas concerned. Shadow prices in the FB model represent the effect on market welfare of a marginal increase of physical capacity of real network elements. In a FB model, price differences between bidding areas are the result of shadow prices on all congested physical network elements. In other words, in a FB market coupling, the shadow price is calculated for any physical network element which is in the model, and it represents the overall market value of an incremental MW of capacity on that physical network element.

To provide understanding on the concept of shadow prices in the light of the current CNTC capacity calculation method, an example with a simple radial grid is provided (Figure 11-32). In case of such a simple power system there is no difference between CNTC and FB in terms of capacity assessment. The shadow price is equal to the resulting spot price difference when relaxing the capacity constraint marginally ($\Delta MW = 1$). If the equilibrium prices are 45 and 50 respectively, the shadow price can be computed to be 5, being equal to the price difference between the bidding areas.



Figure 11-32 Example on CNTC and FB shadow pricing

The shadow price can more formally be calculated as in the formula below. This is the approach used in a FB set-up:

$$P_i - P_j = \sum_{k=1}^K \delta_k \times (PTDF_{j,k} - PTDF_{i,k}) \quad (18)$$

Where:

P_i : Price in area i

K : Number of constraints

δ_k : Shadow price of constraint k

$PTDF_{i,k}$: Influence from area i on constraint k

Applying this formula for the example above, the shadow price can be calculated to be



$$45 - 50 = \delta_{AC}(0 - 1)$$

$$-5/(0-1) = \delta_{AC} \quad (19)$$

$$5 = \delta_{AC}$$

This result is equal to the price difference between the bidding areas.

In case of CNTC, the shadow prices are always equal to the price differences between the bidding areas. In a meshed network that is managed by FB, we expect to see shadow prices that deviate from the CNTC (current method) shadow prices. An example is introduced in Figure 11-33 to demonstrate this.

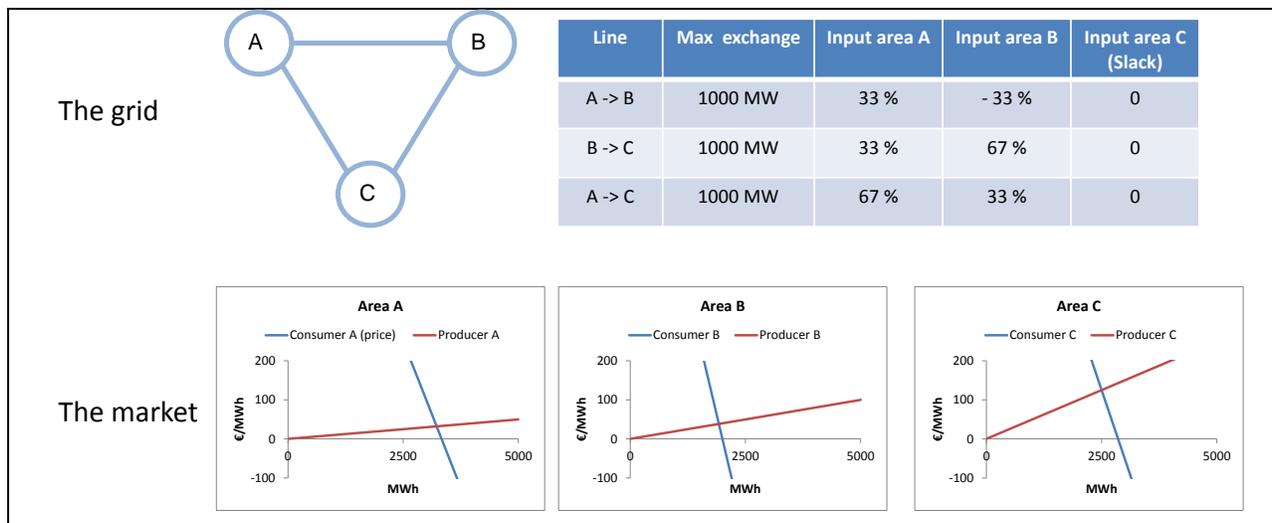


Figure 11-33 Example reflecting a grid and market situation.
The bid curves show an equilibrium before capacities have been taken into consideration

Based on the situation depicted in the example in Figure 11-33, the market outcome for CNTC and FB is illustrated in Figure 11-34.

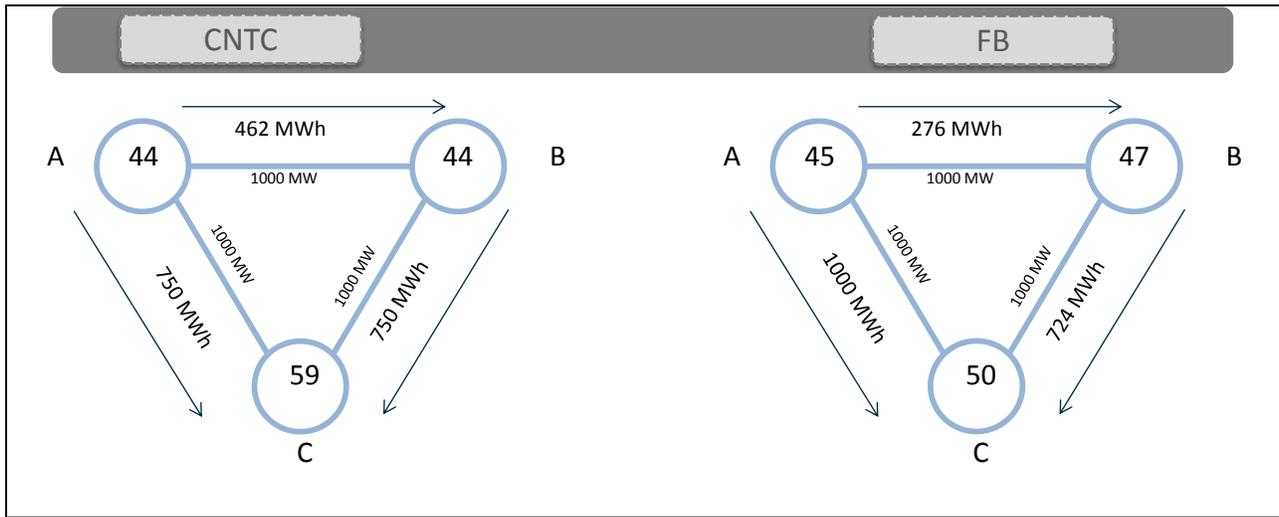


Figure 11-34 The market outcome for CNTC and FB of the example in Figure 11-33

It is easy to see that the shadow prices of Line A→B and B→C equal 0 in the FB situation. The value added when increasing capacity marginally of these lines is 0, as the binding constraint is located at the Line A→C. By applying the formula for the shadow price calculation, the shadow price for line A→C can be computed as follows:

$$P_A - P_C = \delta_{AC} \times (PTDF_{C,AC} - PTDF_{A,AC}) + \delta_{BC} \times (PTDF_{C,BC} - PTDF_{A,BC}) + \delta_{AB} \times (PTDF_{C,AB} - PTDF_{A,AB}) \quad (20)$$

$$45 - 50 = \delta_{AC} \times (0 - 0,67) + 0 \times (0 - 0,33) + 0 \times (0 - 0,33) \quad (21)$$

$$\delta_{AC} = 7,50 \text{ €}$$

This means that the added value of increasing the capacity of line A→C equals 7,50 €/MW. This is only half the value as reflected by CNTC, where the price difference is 15 €/MW.

11.2.9 Impact on management of extreme price situations from FB implementation

In FB, capacity is allocated to the flows that provides most social economic welfare. In extreme situations curtailment occurs when the market clearing price hits the maximum or minimum allowed price in the bidding zone and the offered quantity at these maximum or minimum prices is not fully accepted. This can occur both when there is abundance of generation capacity in e.g. high wind output and generation shortage to meet demand e.g. during cold winter days.



If several bidding zones end up at maximum (minimum) price and buy (sell) orders need to be curtailed the default solution in the FB solution is to allocate the flows that provide most socio-economic welfare. This could lead to one bidding zone being totally curtailed while all the available energy is given to another market which is not necessarily at its maximum price. This is not the case in the current NTC approach where the bidding zones that are not curtailed will be exporting or importing from the bidding zone with curtailment.

In the market algorithm, Euphemia, a mechanism that enables a fairer distribution of the curtailment between all the bidding zones in a Flow-based domain is implemented. This is done by penalizing non-acceptance of price taking orders before looking for the optimal solution. This functionality aims at harmonizing the curtailment ratios across the curtailed bidding zones. Hence, Euphemia allows both to prevent sharing of curtailment and sharing of curtailment. This is also an all TSO requirement on the algorithm to be able to handle these two different approaches. As such, the curtailment sharing rules are part of the capacity allocation and not the capacity calculation. As a consequence it is not part of the capacity calculation methodology for the Nordic CCR.

11.3 Cost of implementation and operation

The aim of this section is to discuss the costs of implementation and operation of the CACM compliant capacity calculation approach. Five cost categories have been identified: Nordic CCM project costs, TSO training costs and changes in procedures, IT costs, stakeholder costs, and TSO operational costs and maintenance costs. They will be discussed in more detail in the following.

11.3.1 Nordic CCM project costs

The Nordic CCM project is responsible for developing a CACM compliant capacity calculation methodology for the day-ahead and intraday timeframes. Both the FB approach and the CNTC approach are in the scope of the project. Since both approaches are to be developed, the cost for FB and CNTC is assumed to be same when it comes to the CCM project costs.

TSO training costs and changes in procedures

Introduction of a new capacity calculation methodology requires changes in procedures at the TSOs. New procedures need to be defined and the TSO personnel needs to be trained to learn and understand the new methodology and procedures. Both CNTC and FB will induce a need to change procedures, although in the case of CNTC the change is not as remarkable as in the case of FB. The TSO training costs are more significant for FB compared to CNTC. However, to some degree it only holds for the short run, where “NTC thinking” has become the second nature. In the long run when new operators are trained and FB is the reference CCM, the training cost cannot be expected to be significantly higher compared to the alternative.



IT development costs

IT development costs refer to the capacity calculation related IT costs in the Nordic RSC as well as the IT development costs in the TSO systems. IT development costs consist of software, hardware and TSO manpower costs. IT development costs are assumed to be quite similar for the FB and CNTC approach.

TSO operational costs and maintenance costs

TSO operational costs and maintenance costs are RSC and TSO costs, which are most likely not dependent on the selected CCM.

Stakeholder costs

Introducing a new CCM is likely to cause some costs for stakeholders. In order to be able to estimate the costs for stakeholders, the Nordic TSOs sent a survey to the Nordic CCM project stakeholder group members. Cost estimates provided by the stakeholder group members are used as input here (5 stakeholder group members provided their answers).

The Nordic CCM project had an assumption that there would be no difference between current NTC and CNTC when it comes to costs for stakeholders. In CNTC, capacities might vary more from hour to hour but otherwise there is no difference seen from the stakeholders' perspective. The stakeholders confirmed this assumption to be in line with their own view.

The following cost categories related to introducing FB were identified by stakeholders:

- Software costs
- Hardware costs
- Costs related to changes in procedures
- Costs related to training of personnel
- Costs related to increased uncertainty
- Costs related to a change in level playing field

Based on answers provided by stakeholders, the estimate of total costs related to the above mentioned categories is on average above 500 k€ per stakeholder. However, as indicated by the stakeholders, there are major uncertainties related to the cost estimates. The biggest uncertainties are related to the costs of changes in procedures, training of personnel, increased uncertainty, and change in level playing field.

Summary of the costs

Table 11-3 shows a summary of the CCM related costs. Different cost categories are listed in the left column. The grey color indicates that there is no difference in costs between the FB approach and the CNTC approach. The red color indicates that the costs for the approach are higher compared to the alternative approach, which is marked with a green color. In conclusion, the total costs for the FB approach are higher compared to the CNTC approach.



Table 11-3 Summary of the costs related to implementation and operation

	FB	CNTC
Nordic CCM project		
TSO training and changes in procedures (short run)		
IT development costs		
TSO operational costs and maintenance costs		
Stakeholder costs		

11.4 Impact assessment in accordance with CACM article 3

Article 9 (9) of the CACM Regulation requires that the expected impact of the CCM Proposal on the objectives of the CACM Regulation is described. The objectives of CACM are listed in article 3 of the CACM. The impact is presented below. The content is also used as input to the whereas section in the legal document.

The CCM Proposal contributes to and does not in any way hamper the achievement of the objectives of Article 3 of the CACM Regulation. In particular, the proposal serves the objectives, promoting effective competition in the generation, trading and supply of electricity (Article 3(a) of the CACM Regulation), ensuring optimal use of the transmission infrastructure (Article 3(b) of the CACM Regulation), ensuring operational security (Article 3(c) of the CACM Regulation), optimising the calculation and allocation of cross-zonal capacity (Article 3(d) of the CACM Regulation), ensuring and enhancing the transparency and reliability of information (Article 3(f) of the CACM Regulation), contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union (Article 3(g) of the CACM Regulation) and providing non-discriminatory access to cross-zonal capacity (Article 3(j) of the CACM Regulation).

The CCM for the CCR Nordic promotes effective competition in the generation, trading and supply of electricity, as the CCM supports fair and equal access to the transmission system. The flow based capacity calculation methodologies does not implicitly pre-select any market players and, hence the competitiveness of bidding is the only criteria on which market players are selected, yet taking the significant grid constraints into consideration.

The CCM for the CCR Nordic secures optimal use of the transmission capacity as it takes advantage of the flow-based capacity calculation methodologies, representing the limitations in the alternating current (hereafter referred to as “AC”) grids. There is no predefined and static split of the capacities on critical network elements, and the flows within in CCR Nordic and between CCR Nordic and adjacent CCR’s are decided based on economic efficiency during the capacity allocation phase. The CCM for the CCR Nordic



treats all bidding zone borders within the CCR Nordic and adjacent CCRs equally, and provides non-discriminatory access to cross-zonal capacity. The CCM for the CCR Nordic fully apply Advanced Hybrid Coupling (hereafter referred to as “AHC”) for the efficient integration of DC interconnectors into the flow-based CCM of CCR Nordic applied for the AC grid.

The CCM for the CCR Nordic secures operational security as the most important grid constraints are taking into account in the Day Ahead and Intraday timeframe. This supports operational security in a short time perspective, where bidding zone re-configuration will be used in a mid-term perspective.

The CCM for the CCR Nordic will ensure full transparency of the calculation of the actual grid capacity. This will in turn result in a better understanding for market participants and improve transparency and reliability of information compared to what is available today on the CCR Hansa bidding zone borders.

The CCM for the CCR Nordic does not hinder an efficient long-term operation in CCR Nordic and adjacent CCRs, and the development of the transmission system in the European Union. The CCM, including taking most important grid constraints into consideration, will support efficient pricing in the market, providing the right signals in a long-term perspective.



12 Timescale for the CCM implementation

Article 9(9) of the CACM Regulation requires that:

“The proposal for terms and conditions or methodologies shall include a proposed timescale for their implementation and a description of their expected impact on the objectives of this Regulation.”

The latest deadline for implementing a harmonized CCM within a Capacity Calculation Region is called for in article 21(4):

“All TSOs in each capacity calculation region shall, as far as possible, use harmonised capacity calculation inputs. By 31 December 2020, all regions shall use a harmonised capacity calculation methodology which shall in particular provide for a harmonised capacity calculation methodology for the flow-based and for the coordinated net transmission capacity approach.”

The following section provides the description of the planned implementation timeline for the Nordic capacity calculation methodology.

12.1 Timeline for implementation of the CCM

Prerequisites

When the new Capacity Calculation (CC) goes live, the calculations will not be done by the local TSOs anymore, rather by the Regional Security Coordinator (RSC), based on input from the TSOs, and finally validated by the TSOs. Two crucial ingredients in this process are the Common Grid Model (CGM) and the Industrialized Capacity Calculation Tool. Both elements need to be in place before the "go-live" of the CCM.

In order to test the CC functionality, a preliminary CGM has been developed and operationalized within the CCM project. However, this model does not provide an operational data quality. As for the preliminary CGM, a prototype tool for capacity calculation has been developed within the project. The industrialized tool should however be available for testing purposes in a suitable time until the final go-live date.

In order to apply a Flow Based Market Coupling, the NEMO market platform must be able to manage market constraints based on FB parameters. The Day Ahead Market algorithm, Euphemia, is developed for this purpose, and it is believed that by the go-live date, the current computational limitations are resolved. The new Intraday platform, XBID, is however currently not suited for using FB parameters. It is not yet clear when this can be developed. The FB approach is thus currently not foreseen to be a viable option for the Intraday market at the go-live date for the FB approach in the day ahead market. The initial solution for the intraday market will therefore be a CNTC approach.



Timeline

As stated earlier, implementation timeline of proposed CCMs is highly dependent on the availability of CGMs as well as on DA and ID algorithms ability to handle FB parameters. Due to these dependencies, timeline for implementing new CCM is presented by listing milestones or checkpoints, and criteria that needs to be fulfilled in each checkpoint before moving forward.

Following table presents the milestones and criteria for implementing FB approach for day-ahead timeframe.



#	Milestone	Criteria to be met before moving to the next milestone
1	Market simulations in Simulation Facility using prototype FB tool (overlapping with milestone #2)	<ul style="list-style-type: none"> • Requirements/specifications for the industrialized tool are finished and are based on the methodology and the experience gained by using the prototype tool • In order to increase transparency, stakeholders are involved in the development of stakeholder information tool • NRAs have approved this proposal
2	Investment decision - FB industrialized tool	<ul style="list-style-type: none"> • Minimum of one year of FB market simulations (as described under milestone #1), where: <ul style="list-style-type: none"> ○ FB is not proven to be less efficient compared to NTC, at the same level of operational security ○ FB is not proven to decrease system security, at the same level of efficiency ○ FB is reliable in producing capacity calculation parameters and results • Market simulation results are published to the stakeholders • GSK and FRM methodologies are fully developed and ready for implementation • CGMs are available and can be applied in the capacity calculation
3	Parallel runs including FB and NTC	<ul style="list-style-type: none"> • Parallel runs are performed in real NEMO systems and capacity calculation parameters are submitted to NEMOs daily as with current NTC <ul style="list-style-type: none"> ○ Precondition is that Euphemia is able to handle FB parameters for a larger area including CCR Nordic when performing calculations for the geographical scope of SDAC • At the minimum 6 months of continuous parallel runs, where: <ul style="list-style-type: none"> ○ FB is not proven to be less efficient compared to NTC, at the same level of operational security ○ FB is not proven to decrease system security, at the same level of efficiency ○ FB is reliable in producing capacity calculation parameters and results • Results from the parallel runs are published daily
4	FB go-live	

Following table presents the milestones and criteria for implementing CNTC approach and finally FB approach for intraday timeframe.



#	Milestone	Criteria to be met before moving to the next milestone
1	CGMs applied in capacity calculation using current NTC approach	<ul style="list-style-type: none"> • GSK and RM methodologies are fully developed and ready for implementation • Coordination in capacity calculation implemented
2	CNTC go-live	<ul style="list-style-type: none"> • FB fully developed, tested in DA and ID, and <ul style="list-style-type: none"> ○ not proven to be less efficient compared to NTC, at the same level of operational security ○ not proven to decrease system security, at the same level of efficiency ○ reliable in producing capacity calculation parameters and results • XBID ready to support FB approach
3	FB go-live	

An indicative high-level timeline for implementing the new CCM is visualized in Figure 12-1: it shows a go-live date of the FB DA CCM and the intermediate ID CNTC CCM in Q4 2019 **at the earliest**.

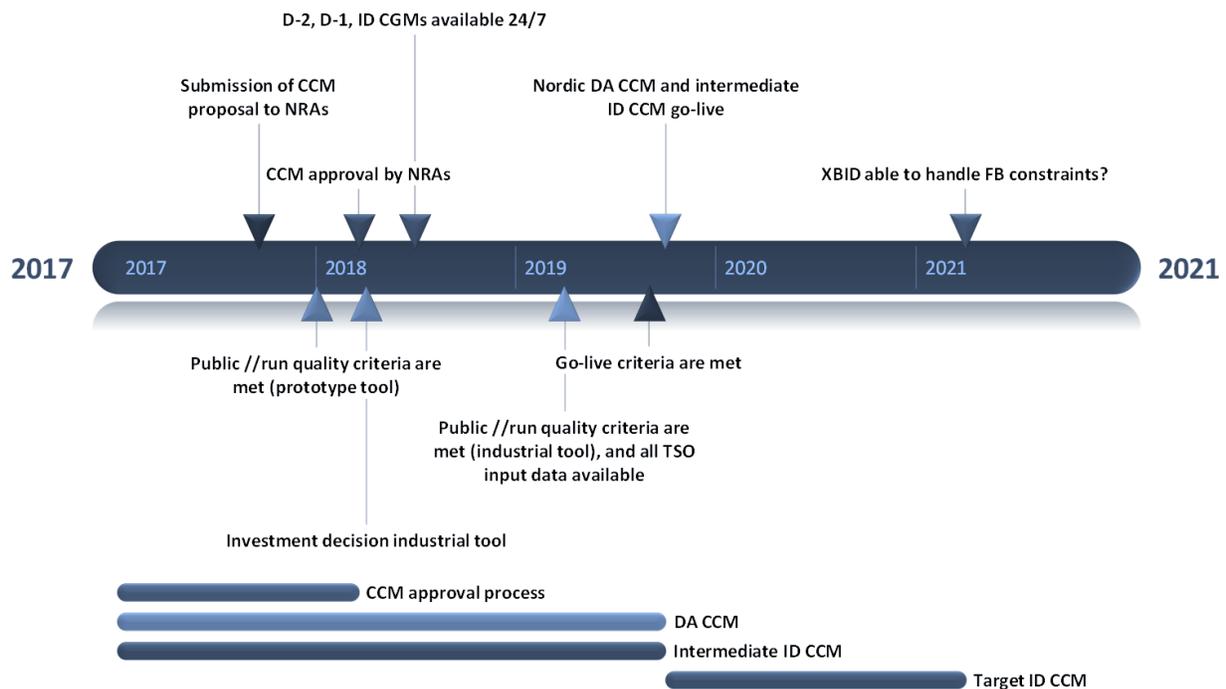


Figure 12-1 Indicative timeline for implementing the new CCM



13 ANNEX I: Results from the public consultation

This document contains the responses from the stakeholder consultation, based on the version on the proposal for CCM for the Nordic CCR published in week 14 2017. The document provides initially an overview on the content for the response and names of stakeholders who has submitted a response.

Main messages from the stakeholders are:

- CNTC should be used as reference – and not NTC – in market simulation
- 16 weeks of data produced while not using the final grid model are interesting, but not enough to base a decision on. Stakeholders find that 18 months parallel run in total are needed, with 12 months parallel run using CGMs, for FB vs. CNTC and necessary industrial tool
- Concerning intuitive and non-intuitive flows: the stakeholders state that they simply do not have enough data to answer whether flow based or flow based non-intuitive should be preferred in the Nordics. We need a parallel run in both versions
- More detailed discussion of ACER's recommendation, fully taking into account possible remedial actions and find a good balance between costly capacity restrictions and costly remedial actions
- Prioritize to implement flow based in the intraday, before or not later than day ahead
- Lack of transparency – anonymous data is not enough:
 - Publication of input parameters and limitations (CNE, Cut) on list, including geographical location, use of GSK strategies
 - Clear capacities; propose to adopt some minimum MW capacities between bidding zones, to be used as input in day ahead planning and price forecasts
 - The TSOs should provide a tool that can be used to forecast flow
 - The small win of 4 million € for 16 weeks can easily be turned into a loss due to opaqueness
- No real learning from what happens in the CWE; Thus we seem to repeat all the mistakes done there. In the CWE a minimum capacity domain was implemented to secure that significant decreases in cross border capacity would not appear. This minimum capacity domain has shown to be in use very frequently. Therefore, we would expect a minimum capacity domain in the Nordics also to ensure that cross border trade does not deteriorate
- The increasing amount of renewables is a significant factor when calculating capacity. Using other than D-1 prognosis will distort the capacities given to the market, so input data should be as updated as possible.



13.1 Name of stakeholders

Stakeholder #	Name of stakeholder
1	Suomen Sähkökäyttäjät ry
2	Vattenfall AB
3	Nordenergi
4	Swedenergy
5	Energy Norway
6	Statkraft Energi AS
7	Danish Energy Association
8	Dong Energy

13.2 Individual responses to the questions raised in the consultation and TSO answer

The responses have been organized per question. The responses are listed in column of the tables in the following sections. As many stakeholders provided similar / the same comment, the stakeholder mentioning it have been mentioned in column 2. Column 3 indicates whether the Nordic TSOs will take the comment into account either in the supporting or the legal document. In column 4, it mentions:

- If the comment is not taken into account in the supporting or legal document, a reasoning why
- When the comment is taken into account in the supporting or legal document, an explanation how the comment is reflected and where

13.3 Question 4

Please state any remarks or concerns with regard to the input data for the Capacity Calculation Methodologies (CCMs), either being CNTC or Flow Based (FB), as described in chapter 7.

Stakeholder response:

Stakeholder response	Stakeholder(s)	Considered action to be taken	TSO answer:
1 Who is relevant authority to control that TSO's input data is valid and support areal price formations.	1	No	<ul style="list-style-type: none"> • If not taken into account in the supporting or legal document, a reasoning why • When taken into account, an explanation how and where It is the task of the NRAs to monitor the TSOs



2	<p>Regarding grid transparency: we lack, however, a firm commitment to transparency concerning input data and a list of the elements the TSOs intend to publish as part of this consultation on the methodology. The status of the electricity grid is an essential element in price formation hence this is market relevant data. Transparency concerning grid input is essential to understand price formation ex-post and to build price expectations for the future.</p> <ul style="list-style-type: none"> We expect that market parties get a simple tool and the capacity calculation matrix for every hour for day ahead price forecasts. If it is necessary to anonymize the critical branches in the matrix for security reasons ex-ante, we expect that keys are published ex-post shortly after to identify all critical branches. This is already established practice in CWE. If there is an UMM concerning the grid, we expect that a tool is published, to translate the impact of the UMM on the matrix. In our view, this is also necessary to comply with the Electricity Transparency Guideline (Commission regulation EU no 543/2013) where TSOs are required to inform about the consequences of network capacity changes (>100MW) up to three years ahead. We expect matrixes and tools for different seasonal flow patterns so that market actors can build their own price forecast and price expectations necessary for managing hydro reservoirs and especially those that can hold more than one years production, which means relevant PTFD matrixes and GSKs amongst others. Transparency is necessary to indicate publicly which critical branches restrict the market the most and thereby indicate and create acceptance for where grid investment is needed 	2, 3, 5, 6	Yes	<p>Transparency will be taken up in a discussion together with the stakeholders, taking into account what stakeholders need and TSOs can offer.</p> <p>With regard to the stakeholder information tool, the following. As mentioned in the supporting document, a stakeholder information tool is being developed in correspondence with the stakeholders. We will take up the discussion with stakeholders to identify need and subsequent solution.</p> <p>With regard to UMMs, the following. The project would like to discuss with the stakeholders (e.g. in the stakeholder group) on how to deal with UMMs in a FB world.</p>
3	<p>Regarding network transparency, CWE regulators have required the TSOs to offer a minimum of cross border capacity in flow based, thereby creating a minimum size of the flow based matrix, independent of the treatment of the critical branches. This minimum capacity matrix has actually been used in a majority of cases. Therefore, in order to avoid reducing capacity made available to the markets and for easier predictability, a minimum capacity should also be considered in the Nordics.</p>	2, 3, 4, 5, 6	No	<p>We understand that the purpose is to have a minimum capacity linked to the long term transmission rights allocated capacity in CWE, in order to secure that at least the long term allocated capacity is covered.</p> <p>1)The proposal seems equally relevant in a NTC world, hence the proposal is not particular</p>



				<p>relevant for FB</p> <p>2)The Nordics have no intentions to implement transmissions rights, hence proposal seems less relevant</p> <p>3)We do not see a need for this support in the day ahead market, as the flow always will go in the right direction, either as a result of LT nomination or that capacity is offered in the other direction in the DA market</p> <p>4)the Nordic CCM project is about proposing a methodology for calculating max available capacity on CNEs and Cuts, not proposing methodologies for calculating min capacity. This, also because it would take resources (from other issues) for developing the method for calculating the right level</p> <p>5)firm minimum level of cross border capacity might have as a consequence that day ahead price does not reflect the true physics of the power system, hence Nordic TSO see this as a non-efficient solution</p>
4	Concerning the Reliability Margin: we appreciate the description of the methodology. We lack a commitment to more transparency of what the actual values used for RMs are and ex-post reports on use of the RMs that would allow an evaluation and a learning process. We expect transparency to future changes of the methodology.	2, 3, 4, 5, 6	No	<p>All detailed information will be shared with the NRAs. Indeed, it is their role to monitor the TSO's processes.</p> <p>Calculation of actual values is not done within this project, only methodology is provided</p>
5	Concerning Generation Shift Keys: we appreciate the description of the methodology. Since GSK shift keys are in essence predictions of behavior and since they play a significant part in price formation, we expect transparency on the use of GSKs. It should be published, which GSK methodology is the default for each area, and there should be regular public analysis if that default methodology is still fitting or if another methodology would be more suitable. It should also be published when a TSO differs from the default methodology and chooses another and the reasons for that choice. Since we are uncertain how flow based affects	2, 3, 4, 5, 6, 7	No	<p>Please note that even in the case that a TSO selects the same GSK for two consecutive days, the actual application of the GSK depends on the generation and load pattern reflected in the CGM.</p> <p>This issue will be taking up later in this project or in a subsequent project, probably during the parallel run where the need for data publication will be</p>



	generators behavior, we wonder if there could be a need to change the GSK methodology, once flow based is actually introduced, since the current default GSKs are based on historical data in a NTC world.			discussed among TSOs and stakeholders
6	Concerning Remedial Actions: we recognize that this is rather a comment to the Common Grid Model, nevertheless we insist on transparency of which remedial actions are included in which reliability margins in advance of the capacity calculation, which aren't included, and which remedial actions are used at the end. Given the ongoing debate of how grid constraints can be alleviated in order to give more capacity for the market this is highly relevant information for market parties. In order to have an informed debate, transparency and reliable information is essential. This information is also essential to have an informed analysis about the costs and benefits of remedial actions.	2, 3, 4, 5, 6	No	All detailed information will be shared with the NRAs. Indeed, it is their role to monitor the TSO's processes.
7	We expect this commitment to transparency and a list of elements to be published to become part of the methodology that will be in the approval process of the Nordic regulators.	2, 3, 5, 6	Yes	Transparency needs to be taken up in a discussion together with the stakeholders, taking into account what stakeholders need and TSOs can offer. This issue will be taking up later in this project, probably during the parallel run where the need for data publication will be discussed among TSOs and stakeholders
8	Swedenergy would like to see a list of the critical network elements, how many hours they are constraining the system and what is the shadow value of increasing the capacity 1 MW. In addition we think not only the average numbers of grid constraints should be shown but also the minimum and maximum values. The impact of the individual grid constraint on the social welfare calculation must be shown.	4	No	As the list of CNEs is published, those kind of numbers can be easily obtained by those stakeholders that are interested in it. This issue will be taking up later in this project, probably during the parallel run where the need for data publication will be discussed among TSOs and stakeholders
9	Swedenergy would also appreciate a better description on how social welfare has been calculated, what assumptions has been made on the short run elasticity of demand, etc.	4	No	Impact on social welfare is calculated in a standard way, as the sum of changes in consumer and producer surplus and TSO congestion rent. There is no assumptions made for short run elasticity or metrics



				<p>of this kind, as we use the actual submitted bid curves for simulation. The elasticity is given by the consumers themselves</p> <p>Please refer to the ch. 10 of the supporting document and the relevant materials from the PXs on Euphemia.</p>
10	<p>Swedenergy expects that market parties gets proper tools, the capacity calculation matrix for every hour for day ahead price forecasts, and other pertinent information. The necessity to have anonymous critical network elements strongly restricts the transparency in the flow based capacity calculation method as compared with the NTC and the CNTC method. Thus the very small welfare gains shown in the calculation may very well be lost when compared with increased opaqueness of how capacity is allocated cross border. If there is an UMM concerning the grid or for example problems with a plant, in the CNTC and NTC context it is relatively straightforward to translate the impact of the published phenomena upon the market. In that sense price formation is more robust in the current capacity calculation setting. Transparency, in the market sense, makes it necessary to indicate publicly which critical branches restrict the market the most and thereby indicates and create acceptance for where grid investment is needed. Thus, transparency in the procedural sense, that we in an abstract manner better know that TSOs calculate capacity using a black box including strict mathematical procedures, may in the best of cases be helpful to the regulators.</p>	4	No	See earlier feedback
11	<p>It is unclear to what extent the use of remedial actions is included as an integral part of the capacity calculation process. If the use of remedial actions such as redispatch or countertrade adds more value than it costs, and thereby increases the overall welfare through more efficient trade or dispatch, it should be included as an integral part of the capacity calculation. The proposed methodology should include and reflect this condition.</p>	7	Yes	See chapter on the inclusion of the ACER recommendation
12	<p>The proposed Reliability Margin (RM) methodology should be significantly more concrete and transparent on what specific</p>	7	No	It is not possible to state specific parameters by the submission of the proposal to the NRAs (sep



	parameters apply in the calculation of the Reliability Margin, so it is possible to anticipate what the margin will be given the circumstances for generation, load and the grid.			2017) as it depends on obtaining sufficient data from market runs in order to state the concrete RM.
13	The increasing amount of renewables is a significant factor when calculating capacity. Using other than day – 1 prognosis will distort the capacities given to the market, so input data should be as updated as possible.	7	No	As mentioned in the CACM and the supporting document, for the day-ahead market time-frame, the capacity calculation shall be based on the latest available information.
14	We think it is important that input data used, must be in the same timeframe as today, where D-1 data is used With the current level of installed renewables and planned buildout, the uncertainty of old prognosis will be far from optimal for the capacity calculation Outages on lines and plant, must also be updated D-1 before used in capacity calculation	8	No	As mentioned in the CACM and the supporting document, for the day-ahead market time-frame, the capacity calculation shall be based on the latest available information.

13.4 Question 5

Please state any remarks or concerns with regard to the Flow-Based (FB) CCM as described in chapter 5 and 6.

Stakeholder response:

Response	Stakeholder(s)	Considered action to be taken	TSO answer:	
1	How flow based calculation will fit to X-BID?	1	No	<ul style="list-style-type: none"> • If not taken into account in the supporting or legal document, a reasoning why • When taken into account, an explanation how and where <p>There is a plan to have XBID develop in such a way that it can handle FB constraints. The question how is no take up yet.</p> <p>For information - A link between FB capacity calculation and ID continuous trading has been described in the following TSC document: http://www.tscnet.eu/wp-content/uploads/TSC_CTF_IntradayCapacityCalculation_201507_publ_b.pdf</p>



2	Vattenfall requests a better description on if, and in that case how, the value of intraday capacity are taken into account at the day ahead stage. This concerns relate directly to the response on question 8, and Vattenfall's major concern that starting the flow based implementation at the day-ahead stage, with D-2 input data is counter intuitive and contradictory to the transition towards a more weather dependent supply system.	2,4	No	Currently there is no economic evaluation foreseen to embed the value of ID capacity in the DA capacity calculation. This due to the fact, that it is unclear what is meant by "value" and moreover; if value is defined as grid capacity being reserved to intraday, the TSOs cannot see the value of decreasing DA capacity as it will harm the day ahead least cost dispatch of generation
3	First, the Nordic stakeholders would like an investigation into the possibility of first introducing flow based in the intraday timeframe as that makes sense given the expected increase of production volatility and intermittency. CACM states that flow based should be the preferred capacity calculation method in all timeframes, and there is no legal reason to start with the day-ahead timeframe.	2,3,4	No	<p>The Nordic TSOs do not see the relevance of introducing FB in ID before DA as the market IT algorithm for ID (developed within XBID) does not yet support FB, yet this is already the case for DA IT algorithm. In essence the approach suggested will delay FB implementation in the DA and thus prevent reaping the benefit of FB in DA at the earliest possible stage.</p> <p>The FB DA will be implemented first, being the market with the largest volume (98% of total Nordic traded volume), followed by a FB ID, as can be seen from the implementation timeline in the supporting document. The intermediate ID CNTC CCM will be a <u>separate capacity calculation based on dedicated CGMs</u>, as explained in the supporting document (not simply left-over capacity).</p>
4	Concerning the intraday capacity calculation in combination with flow based in the day ahead: seeing that the process in CWE is not working as planned with repeated delays, and recognizing that the Nordic TSOs give us oral reassurance that they will work on intraday, we think a written chapter in the methodologies, which describes a clear roadmap of how intraday will be handled under flow based day ahead, is essential. That chapter should describe the path to implementation of flow based in the intraday.	2,3,5	Yes	See section on intraday
5	The consultation documents fail to describe how	2,3,4,5,6	Yes	- See section on intraday



	<p>exactly flow based in day ahead and CNTC in intraday will interact, also describing how capacity will be given in different cases. It should answer how flow based corner solutions in the day ahead will be handled in intraday, how counterintuitive flows across a bidding zone border will be handled, when capacity calculation happens and with which input data etc. Initial intraday capacity on different bidding zone borders should also become part of the data published under the parallel run alongside with prices and resulting flows.</p>			
6	<p>Concerning intuitive and non-intuitive flows: we simply do not have enough data to answer whether flow based or flow based non-intuitive should be preferred in the Nordics. We need a parallel run in both versions, to see, how big the welfare gain of flow based is compared to a version with the intuitive patch. How often do non-intuitive flows happen and are the benefits of non-intuitive flows worth the significant cost in terms of understanding and pedagogical simplicity?</p> <p>It is impossible from the presented material to conclude that the Nordic version of flow based should be non-intuitive as proposed in the consultation documents. The CWE region has chosen the intuitive version and any deviation from their method will affect Nordic price formation differently than the continental price formation. This may be an obstacle for market integration as actors in both regions will have a completely different set of tools to understand what is happening in the infrastructure. In the CWE region both intuitive and non-intuitive flow based runs were presented before any decision was taken. Swedenergy suggests that the Nordic TSOs learn from the discussion in CWE and use the same visualization of the results.</p>	2,3,4,5,6	(Yes)	<p>The Nordic TSO think that non-intuitive FB should be the default solution, due to the argument above, hence we do not see a reason for doing explicit conclusion on this. Having non-intuitive flows is not due to malfunctioning of the model, but a natural part of FB and a result of the interplay of power system physics (path of least resistance) and the difference in marginal costs of generators (and willingness to pay of consumers).</p> <p>In terms of CWE the Nordic TSOs acknowledge that different versions of FB may prevent full market integration. However, it is an open question at this stage which of two solutions provides the lowest welfare:</p> <ul style="list-style-type: none"> • Both CCRs implementing a version of FB (intuitive) with less welfare than the optimal solution or • The Nordic going non-intuitive and CWE going intuitive also with lower welfare than the optimal solution <p>Moreover, if 2) provides lower welfare than 1) we don't see it as given that the Nordics should adapt to CWE, it could also be the other way around..</p>
7	The TSOs should be aware, that currently market participants explain prices to their customers	2,3,4,5	No	The roles and responsibilities in the power market will not



	(consumers in expensive areas, producers in cheap areas), in case of flow based with non-intuitive flows, it will be the TSOs job to explain prices in non-intuitive flow situations. We also point to the experience in CWE, where it was decided to go for flow based intuitive.			change as such, going FB. The TSO's will still explain market outcome as today, but do not foresee to take on responsibilities from retailers (or other commercial parties)
8	Concerning rules for avoiding undue discrimination between internal and cross-zonal exchanges: the methodologies in question could be more detailed and also contain commitments to transparency on use of the tools and evaluation of those methodologies. This is necessary in order to have an informed discussion about the costs and benefits of the different methods.	2,3,5	Yes	Based on the definition of "undue discrimination" the TSO thinks that the proposed FB approach avoids undue discrimination.
9	We regret, that the proposal doesn't discuss ACER's requirement that "limitations on internal network elements' should not be considered in the cross-zonal capacity calculation methods", but refers to operational security without discussing remedial actions.	2,3,4,5,7	Yes	See previous reply
10	We regret also that the proposal doesn't include a description of how CACM's requirement "TSOs should use a common set of remedial actions such as countertrading or redispatching to deal with both internal and cross-zonal congestion." will be implemented. Transparency on countertrading should be part of the methodology, location, volume, frequency and cost.	2,3,4,5,6,7	Yes	In the sup doc. and legal document it is indicated how remedial actions are taken into account; some CNE's will not enter into the CC and some will
11	Concerning bidding zone delimitation flow based will give a lot of useful data, but it won't help market participants understand bidding zone delimitation, if the limiting critical branches are anonymous and their location is not known.	2,3,4,5,6	Yes	The TSO will launch a transparency sub-task together with the stakeholders on this one
12	In general: flow based is described as an efficient methodology to handle congestion, but for market parties it comes at a cost because understanding the price formation and forecasting prices becomes significantly more complicated. Therefore, transparency is needed, why flow based is a good tool to handle congestion, how internal congestions affect cross-border congestions, but also to discuss which other tools are available, what are the cost of the different tools and then make an informed decision about the cost and benefits.	2,3,5,6	Yes	Before going into the parallel run the TSO will facilitate a discussion on how to maximize transparency, hence the TSO will launch a transparency sub-task together with the stakeholders on this one
13	Swedenergy requests a better description on if and how the value of intraday capacity is taken into account at the day-ahead stage. Swedenergy's major concern is that starting the	2,4	No	As mentioned in the CACM and the supporting document, for the day-ahead market time-frame, the capacity calculation



	flow based implementation at the day-ahead stage, with D-2 input data, is counterintuitive and contradictory to the transition towards more weather dependent supply system.			shall be based on the latest available information.
14	<p>The impact assessment more or less assumes that the non-intuitive version of flow-based is what has to be shown. This is remarkable considered that CWE has opted for the intuitive version reasoning like this:</p> <p>a) the FB “intuitive” only decreases the day-ahead market welfare while it does not bring any good property to the models; Choose the non-intuitive version</p> <p>b) The stakeholders have a preference for ATC-like properties which exist more often in “intuitive”. Areas involved in non-intuitive exchanges should not have to import (resp. export) with the lowest (resp. highest) price to “help” others. In addition, if the zonal size affects whether you more often are involved in non-intuitive situations; choose the intuitive version</p> <p>c) With a “commodity market” point of view: A product should not be sold in another country at a lower price than the price charged in its home market. Changing price dynamics may make forecasting price more difficult; Choose “intuitive”</p> <p>Apparently the second and third reasons were enough to warrant the development of an intuitive version in CWE. Swedenergy thus suggests that the default version of flow based capacity calculation should be the intuitive version.</p>	4	Yes	<p>The Nordic TSOs think that non-intuitive FB should be the default solution, for the argument of socioeconomic welfare. Having non-intuitive flows is not due to malfunctioning of the model, but a natural part of FB and a result of the interplay of power system physics (path of least resistance) and the difference in marginal costs of generators (and willingness to pay of consumers).</p> <p>In terms of CWE the Nordic TSOs acknowledge that different versions of FB may prevent full market integration. However, it is an open question at this stage which of two solutions provides the lowest welfare:</p> <ul style="list-style-type: none"> • Both CCRs implementing a version of FB (intuitive) with less welfare than the optimal solution or • The Nordic going non-intuitive and CWE going intuitive also with lower welfare than the optimal solution <p>Moreover, if 2) provides lower welfare than 1) we don’t see it as given that the Nordics should adopt to CWE, it could also be the other way around.</p> <p><u>Actions: as described earlier</u></p>
15	Swedenergy lack a general description on how remedial actions are used. From some of the comments in the stakeholders’ forum, as well as the answer to ACER that this concerns internal bottlenecks it is difficult to avoid the conclusion that some of the TSOs want to use flow based to avoid countertrading internal bottlenecks and instead move them to the border. Swedenergy strongly urge the regulators to prevent flow	4	Yes	The TSOs will elaborate on RA and ACER recommendation as indicated in an answer above



	based capacity calculation becoming a tool to move internal bottlenecks to the border by including structural congestions into the mathematical algorithm as critical network elements! As countertrade is part of the allowed methods in regulation 714, it should be part of the methodology.			
16	We need forecast for PTDF matrixs, and the forecast should cover what we need for optimization of our seasonal and multi-year (up to 3 years) hydro power reservoirs, ref also our answer to question 11.	6	Yes	As stated above the TSOs will facilitate a discussion among TSOs/stakeholders on what tool/info is needed to maximize transparency in due time, before going into parallel run
17	The methodology should be clearer on how HVDC links are handled under Flow Based compared to NTC. Flows on HVDC can/will be influenced by internal constrains in an anonymous/"random" biddingzone?	7,8	Yes	The TSO's have rewritten the section on AHC in the supporting document
18	We fear that transparency will be close to zero. When preparing our bid today we have a clear picture of the day ahead market, regarding flows and price level. In FB we don't know which constrains in which biddingzone will be the limiting factor, influencing flows to/from our biddingzone	8	Yes	As stated above the TSO will facilitate a discussion among TSOs/stakeholders on what tool/info is needed to maximize transparency in due time, before going into parallel run
19	We would like to see a longer period with parallel runs before taking decision on using FB. We are concerned if internal constrains will be pushed to the border/HVDC's.	8	Yes	The //run is already ongoing. The tools and final CGMs are not yet available though. The go-live is depending on quality criteria to be met; at least 6 months.

13.5 Question 6

Please state any remarks or concerns with regard to the CNTC CCM as described in chapter 6.

Stakeholder response:

Response	Stakeholder(s)	Considered action to be taken	TSO answer:	
			<ul style="list-style-type: none"> If not taken into account in the supporting or legal document, a reasoning why When taken into account, an explanation how and where 	
1	During the stakeholder interaction process, Stakeholder representatives have asked for a	2,3,4,5,7,8	No	Request has been taken on board in the CCM project.



	<p>proper evaluation of the difference between a CNTC and FB methodology, with real historical outcomes/flows as a reference. Such a calculation has however not been performed and thus it is impossible to assess the CNTC method as a relevant and objective reference point has not been available. In order to make a proper comparison between two alternatives (CNTC and flow based) both need to be modeled to the same degree and go through parallel runs. Swedenergy considers the fact that the TSOs did not include a proper evaluation of CNTC a large and important failure.</p>			<p>However, this will not be reflected in the supporting or legal document, due to lack of resources and indication that FB will entail better welfare compared to CNTC.</p>
2	<p>In addition, any comparison between flow based and CNTC needs to include other factors besides the pure day ahead optimization, such as compatibility with a functioning intraday market.</p>	2,3,4,5	No	<p>The CNTC methodology proposed for ID is an interim solution that will secure DA compatibility with a functioning intraday market</p> <p>The impact assessment provides insight on the impact on other markets.</p>
3	<p>When the evaluation of the CNTC is made it is not enough to consider a comparison with flow based within the flow based context. As flow based capacity calculation is a mathematical optimization given certain parameters and inputs, any other method put into this context must per definition be worse. However, it is Swedenergy's belief that CNTC gives more flexibility to later time frames (intraday, balancing market), supports the commercial actions and gives transparent long run signals where investments in transmission and capacity is needed. These are positive values which should be included in the evaluation.</p>	4	No	<p>Capacity calculation is a continuous process: by using the latest information available, the most capacity is provided for the upcoming timeframe(s). Or in other words: for the ID timeframe dedicated grid models will be created and dedicated capacity calculation will be performed to serve the ID market as good as possible. Note, in this respect, that an integral part of the capacity calculation is the assessment of the uncertainty that the TSOs are facing in their capacity calculation. It is expected that the uncertainty for the DA stage is larger than that for the ID stage, as better forecasts are available for the ID and less assumptions need to be made. The Flow Reliability Margin (FRM) reserved at the DA stage can thus partly be released on the ID stage. Please note that this provides an automatic balance: if the variability in the system increases, a larger need for ID capacity may be foreseen. This larger variability is likely to</p>



				increase the uncertainty for the TSOs in their DA capacity calculation: a larger DA FRM needs to be taken into account, thereby shifting more capacity to be released at the ID stage.
4	CNTC is our preferred solution. CNTC will provide additional Social welfare compared to NTC, without losing transparency, at least that is our understanding. Going with CNTC, the day ahead market will be aligned with the intra day market.	8	No	Noted. CNTC might provide more welfare than NTC. But it is the position of the Nordic TSO that the welfare potential can be further exploited by implementing FB, yet having a good alignment with ID market
6	When Xbid is ready, TSO's can look in to going FB	8	No	As mentioned in the supporting document, and reflected in the implementation timeline on pp. 125, this is indeed the plan for the ID CCM.

13.6 Question 7

*Do you agree with the proposal for a Flow-Based (FB) capacity calculation for the day-ahead timeframe?
Please state reasons why.*

Stakeholder response:

Response	Stakeholder(s)	Considered action to be taken	TSO answer:	
			<ul style="list-style-type: none"> • If not taken into account in the supporting or legal document, a reasoning why • When taken into account, an explanation how and where 	
1	From a general perspective, making decision early comes at a cost of lost flexibility. It is Vattenfall's view that the operation of a transmission system requires sufficient room to maneuver and flexible options. Starting from that perspective, optimizing the use of the transmission grid based on input data from D-2 raises some concerns on how this flexibility will be ensured.	2	No	For both the day-ahead and intraday market time-frame, the capacity calculation will be based on the latest available information.
2	Transparency in the considerations behind any proposed reliability margins is requested.	2	No	The methodology applied to compute the RM is explained extensively in the supporting



				document.
3	In addition, the proposal does not seem to make a difference between structural or temporary congestions. It is crucial that the capacity calculation methodology should not be used to avoid any structural congestion.	2	No	The proposal does not make a difference between structural or temporary congestions. This is due to the fact, that this discussion is mainly related to the discussion of bidding zone configuration, as structural congestions shall be managed by bidding zones. Evaluation on bidding zone configuration is however regulated in other part of the CACM and will have its own process. The CCM proposal on the other hand will identify which CNEs not important for X-border trade can be taking out of the day ahead constraints. See comment on this elsewhere
4	<p>Thus, given magnitude of this change; the relatively limited estimated social gains (see answer to question 10), lack of properly designed solution for intraday, and the diverging opinion between a not insignificant share of stakeholders and the TSOs on the relevance of a flow based method for the Nordic System, Vattenfall calls for a careful assessment of the proposal and to await the outcome of the full 18 months of parallel runs before committing to a transition to flow based capacity allocation.</p> <p>The welfare changes seem small and build upon the non-intuitive version of flow-based. As such the risk of a complete change of capacity calculation methods to the commercial transactions seems higher than the small benefits. At the outset we are then comparing a small potential upside for the system operators (avoiding counter trade and pushing bottlenecks to the borders) and a large potential downside for the stakeholders (less cross border capacity and deteriorated and opaque price formation).</p>	2,4,6	Yes	<p>The objective of parallel run is twofold:</p> <ul style="list-style-type: none"> -provide comfort to stakeholders -secure a proper operation of the market <p><u>Action:</u> see earlier comment</p>
5	Recognizing the time pressure due to deadlines within the CACM guideline, we still think it is premature to take a decision to adopt the flow based calculation method based upon the available material. A final decision should in our view be postponed to after the 18 month parallel run, of which at least 6 month should be on the final Common Grid Model. That material could also include an assessment of a continuation of the CNTC as a method. (In addition, Swedenergy urge the regulators to	2,3,4,5,6	No	See former answer



	foremost and primarily consider the flow based calculation method in the intraday timeframe.) (Note: stakeholder 6 suggests 18 months parallel run in total with 12 months parallel run using CGMs, for FB vs. CNTC and necessary industrial tool)			
6	The material does not include a sensitivity analysis, providing a case that the relatively small welfare gains are robust. This sensitivity analysis is especially important considering that not the final common grid model is used in the simulations.	2,3,4,5	No	The upcoming parallels runs will provide more quantitative results.
7	We would like a chapter discussing the lessons learned from the implementation of flow based in CWE. CWE for example sees challenges in XB intraday trade and market parties report problems to understand price formation when the Critical Network Elements are kept secret. In addition, CWE has decided, to employ an intuitive patch in their flow based version.	2,3,4,5	No/Yes	The lessons learnt in CWE have been taken into account. Indeed, the ID capacity calculation is a dedicated capacity calculated based on dedicated CGMs (which is a different starting point then in CWE when going live). The TSOs will check the options to test using the intuitive patch.
8	We would also like a chapter, discussing more detailed ACER's recommendation. ACER's main concern is that congestion is pushed to the border, that is in our view the reason behind ACERs suggestions for congestion management. Flow based as such does not prevent that congestion is pushed to the border. Much depends on the choice of critical branches, the choice of parameters for these critical branches and how remedial action such as countertrading is included in the capacity calculation. We would appreciate a more detailed description how ACER's main worry is addressed concretely, when introducing flow based.	2,3,5	Yes	The ACER recommendation has been elaborated more upon in the supporting document, and implemented subsequently in the legal document.
9	We lack a more detailed discussion on the impact on the electricity markets. If the system price and the relationship between area prices (and the system price) changes, and if market participants have a reduced understanding of price formation, the efficiency of the markets could be reduced. Forward markets are an integral part of the Nordic electricity markets and contribute to its efficient functioning. It is therefore of the utmost importance that the introduction of flow based capacity calculation also includes some analysis of the alignment with the network code for forward markets. In the case of the non-intuitive implementation	2,3,4,5	Yes	Improvements can be made in the sup doc.



	Swedenergy fail to comprehend how flows in the wrong direction can be aligned with the implementation of the forward code and liquid forward markets.			
10	We regret that the TSOs have not taken up the suggestion by market parties to analyse the introduction of flow based in the intraday market first. Given that we expect a power system with large intermittency and forecasts that are only becoming valid close to real time, any change of the capacity calculation method in the Nordics should prioritize the intraday timeframe.	2,3,4,6	No	The FB DA will be implemented first, being the biggest market, followed by a FB ID, as can be seen from the implementation timeline in the supporting document. The intermediate ID CNTC CCM will be <u>a separate capacity calculation based on dedicated CGMs</u> , as in the supporting document (not simply left-over capacity).
11	One issue often discussed regarding the flow-based capacity calculation is whether it is transparent or not. Van den Bergh et al (2016) points out that as flow-based as a methodology compared to the current NTC, is more strictly defined, thus in the procedural sense it is more “transparent”. We can all know the mathematics behind the optimization. It should be clear that part of that seeming transparency still leaves ample room for the transmission system operators to steer the results (Marien et al (2013) and thus move internal bottlenecks to the border. The latter is addressed by ACER’s recommendation per November 2016, which is only superficially addressed in the consultation documents. However, it is not conclusive that the coordinated NTC, based on a common grid model could not be almost as well-defined. Van den Bergh et al continues: “once the capacity allocation parameters are determined, an ATC-value indicates more clearly which transmission capacity is available to the market, compared to the FBMC parameters [...]. Hence, from a market player’s perspective, the transparency of F(low)B(ased)M(arket)C(oupling) can be questioned”. (our bold). Thus a more formal version of the CNTC with more openness towards the regulators and the stakeholders of what is performed, how and why, likely would increase both the procedural transparency, and the transparency of the market outcomes.	4	No	The proposal is FB, not CNTC.
12	The underlying idea in the proposed version (and as stated in the stakeholder forums) seems to be a) avoiding counter trading b) push congestion to the borders by including them in the mathematical procedures. None of these reasons follows the intentions in neither 714 nor	4	No	This is a speculative argument and disregards the fact that flow-based capacity calculation is the European target model for capacity calculation as stipulated in the CACM Regulation.



	the ACER (2016) principles.			
13	As a starting point Statkraft support methods to improve available capacity of the Nordic transmission system. We recognize that a flow-based calculation for the day-ahead timeframe could increase the utilization of the transmission system. However, we are not at all sure it will increase the utilization of the Nordic power system and thus increase Nordic welfare. We are actual afraid it could reduce it. Our concern is primarily connected to market actors' ability to have appropriate tools and sufficient information to take optimal decisions regarding energy management. As a hydro producer with seasonal and multi-year reservoirs we need to have reliable estimates of cross-zonal transmission capacities at least for the next three years to plan for optimal utilization of the reservoirs to maximize value creation based on the company and the nation's resources. So far we have not seen plans for how this can be achieved. Therefor we do not think we have sufficient information to conclude that flow-based should be used for the day-ahead timeframe.	6	Yes	See the earlier answer: to be discussed among TSOs and stakeholders
14	Introducing flow based in the day-ahead time frame alone creates a risk of negative effect on the intraday market and subsequently perhaps no net gain across time frames of introducing flow based day-ahead. We therefore suggest to postpone the introduction of flow based day ahead until the intraday platform is also ready for flow based, so the overall effect on the two timeframes can be assessed simultaneously and thus more accurately?	7	No	The intermediate ID CNTC CCM will be <u>a separate capacity calculation based on dedicated CGMs</u> , as explained in the supporting document (not simply left-over capacity).
15	We prefer to have both day ahead and intra day using the same methodology. We suggest using CNTC for both DA and ID	8	No	It is the target to have the same CCM for both DA and ID: a FB CCM.

13.7 Question 8

Do you agree with the proposal for a CNTC capacity calculation for the intraday timeframe as a first step of the ID CCM implementation? Please state reasons why.

Stakeholder response:



Response	Stakeholder(s)	Considered action to be taken	TSO answer:
<p>1 Vattenfall's view is that the flow based concept makes more sense the closer the system are the delivery period. Hence, we find the current proposal as somewhat counter intuitive, and perhaps premature to propose a methodology that cannot include a flow based solution for intraday.</p>	2,4	No	<p>The TSO does not see that a smaller gap between market price calculation and actual delivery to qualify for FB implementation, but rather the volume in the market. The FB DA will be implemented first, being the market with largest volume, followed by a FB ID, as can be seen from the implementation timeline in the supporting document. The intermediate ID CNTC CCM will be <u>a separate capacity calculation based on dedicated CGMs</u>, as explained in the supporting document (not simply left-over capacity).</p>
<p>2 Vattenfall share the concern raised by the industry that the process for developing the long term solution for flow based methodology for intraday is not described properly. Judging from the continental experience the solution for intraday is still a question mark which suggest that the Nordic region may utilise that experience further before making a final commitment.</p>	2,4	No	<p>The long term solution for ID is FB. This FB solution is the same as for DA, hence the FB description also goes for ID.</p>
<p>3 Article 3 of the CACM regulation explicitly calls for: (b) ensuring optimal use of the transmission infrastructure; and (d) optimising the calculation and allocation of cross-zonal capacity; and (g) contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union. With the current information at hand Vattenfall questions if the solution put forward, that does not include a flow based solution for the intraday time frame, can be regarded as in line with these requirements. Swedenergy does not, for the above reasons,</p>	2,4	Yes	<p>The TSOs has now address the proposed solution in terms of CACM article 3 and assess how the proposed solution fulfills the objectives of the CACM. As stated above implementing FB in ID, at the same time as FB in DA, will delay the implementation of FB in DA and hence not reap the benefit of implementing FB asap.</p>



	approve of any solution that does not implement flow based at day-ahead and intraday at the same time, or that starts with implementing flow based in the intraday timeframe.			
4	No, the intraday market should be the primary objective for flow-based capacity calculation. The needs of the power system are better known closer to real time. Thus flow based could provide real values in the intraday timeframe. For example, close to real time there is much less uncertainty regarding production and consumption, leading to less need for approximation in the GSKs.	2,3,4,5,6	No	Indeed, FB ID is defined as the target CCM. Please also see comments above.
5	We are afraid that unfortunate situations will appear if day-ahead is based on flow-based and ID on CNTC. This is connected to possible solutions in day-ahead outside CNTC domain in intraday and handling of non-intuitive in the intraday market.	6	No	The TSOs will ensure a well-functioning operation of FB DA and CNTC ID. The intermediate ID CNTC CCM will be a <u>separate capacity calculation based on dedicated CGMs</u> , as explained in the supporting document (not simply left-over capacity).
6	No, we would prefer that the day-ahead and intraday timeframes would use the same capacity allocation methodology from the beginning to avoid distortions between timeframes.	7	No	See comments above
7	No, we would like to have coordinated DA and ID markets, both CNTC. Same method will, in our view, give the most smooth and transparent operation of the market. When Xbid is ready AND tested, we can take a discussion on going FB in both markets	8	No	FB is defined as the target CCM for both DA and ID.

13.8 Question 9

Do you agree with the proposal for a Flow-Based (FB) capacity calculation for the intraday timeframe as the final step of the ID CCM implementation? Please state reasons why.

Stakeholder response:



Response	Stakeholder(s)	Considered action to be taken	TSO answer:	
			<ul style="list-style-type: none"> If not taken into account in the supporting or legal document, a reasoning why When taken into account, an explanation how and where 	
1	The relevance of a flow based concept increase the closer one gets to delivery. As such, the Intraday solution should rather be the "first", than the "next" step.	2, 3, 4,6	No	FB ID is defined as the target CCM. Please also see comments above
2	In our view, flow-based capacity calculation for the intraday timeframe makes sense as the first step, before the introduction in day ahead. We would appreciate a chapter in the methodology, describing a concrete roadmap on how to get there. In addition, we do not believe in introducing flow based in the day-ahead timeframe and only after that start with intraday. Experiences from CWE show that the solutions for intraday risk being delayed. We do think that a reverse process with an introduction on the intraday first may have a better chance of succeeding to introduce flow based in all time horizons.	3,6	No	The TSO does not see that a smaller gap between market price calculation and actual delivery to qualify for FB implementation, but rather the volume in the market. The FB DA will be implemented first, being the market with largest volume, followed by a FB ID, as can be seen from the implementation timeline in the supporting document. The intermediate ID CNTC CCM will be <u>a separate capacity calculation based on dedicated CGMs</u> , as explained in the supporting document (not simply left-over capacity).
3	Yes, and in our view it could even be the first step before or at the same time as day ahead. We would appreciate a chapter in the methodology, describing a roadmap on how to get there. We also would appreciate a roadmap on the plans are in the medium term under NTC/CNTC to ensure that remaining capacity is allocated to the market and that capacity is recalculated especially in the case of counterintuitive flows and corner solutions.	5	No	See answer to former comment
4	Yes, a common solution for day-ahead and intraday is preferred in the longer term	7	No	Indeed, FB is defined as the target CCM for both DA and ID.
5	A common solution support the most smooth operation.	8	No	Indeed, FB is defined as the target CCM for both DA and ID.
6	All systems must be tested thoroughly before they are put in operation	8	No	As indicated in the implementation timeline in the supporting document, quality



			criteria need to be met along the timeline.
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13.9 Question 10

Please state any remarks or concerns with regard to the implementation timeline in chapter 11.

Stakeholder response:

Response	Stakeholder(s)	Considered action to be taken	TSO answer:	
			<ul style="list-style-type: none"> • If not taken into account in the supporting or legal document, a reasoning why • When taken into account, an explanation how and where 	
1	How this will affect to the Nordic system price?	1	No	The system price is touched upon in the impact assessment chapter of the supporting document.
2	The implementation of flow-based should not happen before a 18-month period of satisfactory parallel runs has taken place, which were visible to stakeholders in real time, so it is possible to question prices in direct comparison to today's results. That way stakeholders can build experience of forecasting flow based prices in almost "real" conditions. There must be at least 6 months using the final version of the common grid model, since changing the grid model can have significant effects on both NTC and flow based prices. This should preferably be in the winter, when the system is usually more stressed. (Note: Stakeholder 8 only addresses of using CGM for the CCM proposal, not on the duration, or season)	2,3,4,5,6,7,8	Yes	<p>The objective of parallel run is twofold:</p> <ul style="list-style-type: none"> -provide comfort to stakeholders -secure a proper operation of the market <p>Action: see earlier action</p>
3	The parallel run needs to happen with flow based and with flow based with the intuitive patch, should there be any real comparison between the two.	2,3,4,5,6	Yes	The Nordic TSOs think that non-intuitive FB should be the default solution, for the argument of socioeconomic welfare. Having non-intuitive flows is not due to malfunctioning of the model, but a natural part of FB and a result of the interplay of power system physics (path of least resistance) and the difference in marginal costs of generators



				(and willingness to pay of consumers). <u>Actions: see earlier action</u>
4	The implementation of flow-based in any timeframe should not be allowed until the solutions for other timeframes (intraday especially) has been demonstrated to be fully working in practice. Thus we expect the Nordic project to incorporate lessons from the CWE.	2,3,4,5	No	The lessons learnt in CWE have been taken into account. Indeed, the ID capacity calculation is a dedicated capacity calculated based on dedicated CGMs (which is a different starting point then in CWE when going live)
5	The formalities on which criteria are met before going live after experiences from parallel runs are unclear.	7	Yes	Indeed, it is too early in the process to dive into that level of detail. This will be dealt with later on just before launching the parallel run

13.10 Question 11

Please state any remarks or concerns with regard to the impact assessment as described in chapter 10.

Stakeholder response:

Response	Stakeholder(s)	Considered action to be taken	TSO answer:	
			<ul style="list-style-type: none"> • If not taken into account in the supporting or legal document, a reasoning why • When taken into account, an explanation how and where 	
1	Vattenfall remains concerned that the proposal for such a significant regulatory change, that will impact everything from the need to change/revise trading system, analytical tools, transparency and behaviour of market participants are made based on estimated welfare gains that are relatively close to zero and very small in relation to the total value of the electricity traded. As for all simulations and socio economic calculations, these estimates come with some degree of uncertainty. In this case, it seems reasonable to tentatively conclude that the gains are not significant, and the risks relatively unknown territory. Wait and see, evaluate further and look or wait for a robust	2,4	No	There is (besides the CACM GL) an incentive for the TSOs to move into a FB CCM, as explained in the supporting document. This brings along a welfare gain in the Nordic region and is therefore considered to be a good step forward.



	<p>solution for the intraday time frame would according to Vattenfall's assessment be a sensible decision at this stage.</p>			
2	<p>In our view it is premature to make a decision based on the material of 16 weeks using not the final tools. The final decision to implement (or not) should be made after a successful uninterrupted parallel run of 18 month on the final grid model, as described above. In addition, the alternative CNTC has not really been properly assessed.</p> <p>Especially, when the majority of the welfare is derived from 3 weeks. Rather a scenario analysis with data for a fulfilling range of market situations including warm/cold winters, high/low precipitation years, high/low nuclear output and high/low renewable outputs should be conducted to credibly assess the performance of flow based over CNTC. (note: from stakeholder 7)</p>	2,3,4,5,6,7,8	No	<p>The purpose of parallel run is not to judge whether or not to go FB. This decision was taken by the time of CACM development and is not up for discussion again. This was also clearly stated by the Nordic NRAs at the stakeholder forum (Feb 8, 2017).</p> <p>The objective of parallel run is twofold:</p> <ul style="list-style-type: none"> -provide comfort to stakeholders -secure a proper operation of the market
3	<p>The concern regarding the functioning of intraday markets, if there is a move to flow based in the day ahead, has not been properly assessed. In addition, the option to move to flow based in intraday first, should be assessed.</p>	2,3,4,5,6	No	See previous comments on this issue
4	<p>Given the small welfare gain, a sensitivity analysis is crucial. The model assumes unchanged behavior of flexible hydroproducers. This is not for example not a realistic assumption.</p> <p>The results in the Nordics show a decrease in producer surplus and an increase in consumer surplus. However, looking at the results for welfare in CWE 2014 most of the welfare gains emanates from an increase in producer surplus. This should give rise to serious doubts about the Nordic calculations, and also emphasize the importance of openness of the calculations and the necessity of real sensitivity analysis. The TSOs should be able to explain why and how this difference in the results occurs. Looking at the procedures explained in the consultation material, one hypothesis on how these results occurs is that hydro is considered, by the TSOs, to be infinite. Thus Norwegian hydro production can be increased infinitely and replace other Nordic production. That would indeed lower prices in any modeling exercise. However, this is not even remotely realistic.</p> <p>The change in welfare gain should be calculated during the period with parallel runs and</p>	2,3,4,5,6	No	<p>Upon the stakeholders request, the simulation data of the 16 weeks has been shared and you are cordially invited to dive into the results.</p> <p>The TSOs consider the results for the 16 weeks to be in line with expectations: FB provides more grid capacity to the power system, hence the overall all system cost of generation must be decreased. This, in turn, must lead to a lower price level, hence consumer surplus must increase.</p>



	compared to possible disadvantages with the flow-based compared with the alternative. (from stakeholder 6)			
5	We would be interested in seeing the difference between flow based and intuitive flow based in terms of welfare, given the difficulties to explain non-intuitive flows to various stakeholders. In CWE they chose flow based intuitive after the parallel run, since the welfare gains were relatively small compared to cost such as difficulties to understand price formation.	2,3,4,5,6	Yes	The Nordic TSOs think that non-intuitive FB should be the default solution, for the argument of socioeconomic welfare. Having non-intuitive flows is not due to malfunctioning of the model, but a natural part of FB and a result of the interplay of power system physics (path of least resistance) and the difference in marginal costs of generators (and willingness to pay of consumers). <u>Actions: earlier action</u>
6	We lack an assessment of alternative solutions to grid problems such as transit flows. Could transit flows also be addressed by modern phase shifters (NO3 – NO5 (Ørskog Sogndal))? What are the cost of remedial actions to alleviate problems? Moving from NTC to flow based is a radical step; are there incremental steps to solve problems, which would avoid a considerable change from today's system?	2,3,4,5	No	
7	Concerning spot markets: Seemingly stochastic variations between area prices will put especially smaller market participants at a disadvantage, as their lower production volume cannot support sophisticated forecasting tools.	2,3,4,5	No	Noted.
8	Concerning the forward markets: it's not just the system price forecast that power producers need to get right. Given that they are physically located in price areas and want correctly dispose their reservoirs and to hedge their production, they need a way to produce a credible area price forecast. And for areas where flexible hydro power is at the margin i.e. Norway, the marginal price is not a simple calculation based on fuel cost but a calculation based on water values. In these calculations the understanding of the underlying grid models plays an important role. Lastly we should point out that demand does have an impact in the price formation. We recognize that the TSOs have provided a "Stakeholder Information Tool", which is a first step. This needs however to be complemented by a tool that translates UMMs concerning the grid into changes in the tool/capacity matrix. In addition, creating a black box on critical network	2,3,4,5	Yes	With regard to the stakeholder information tool, the following. As mentioned in the supporting document, a stakeholder information tool is being developed in correspondence with the stakeholders. The TSOs will facilitate a discussion among TSOs/stakeholders on what tool/info is needed to maximize transparency in due time before going into parallel run With regard to UMMs, the following. The project would like to discuss with the stakeholders (e.g. in the stakeholder group) on how to deal with UMMs in a FB world.



	elements doesn't help understanding and forecasting price variations between hourly area prices closer to real time for example a week ahead, which is necessary for the correct disposition of the reservoirs.			<u>Action:</u> see earlier action
9	<p>Concerning investment signals: creating a black box on critical network elements does not help in decisions where to (re)invest in (new) generation capacity. It also does not create a clear investment signal of where grid capacity is needed.</p> <p>The long run impact on investments in generation and transmission capacity has not been analyzed. With "secret" bottlenecks affecting prices in a completely different way than in the current system, the evaluation of future investments in generation capacity becomes more difficult and risky. Concerning the investments in transmission capacity, it is hard to perceive how a case for a transmission capacity increase is argued when we cannot talk about the bottleneck in clear terms.</p>	2,3,4,5	No	<p>We fail to see the difference with today's situation?</p> <p>The TSO does not see that impact on investments is within the scope of the project. However, we do state that FB might give additional info on the need for investment compared to NTC in terms of a shadow price of the CNEs and Cuts</p>
10	<p>Concerning transparency: flow based has the potential to clearly show how TSOs act, if all the data is made transparent. This is currently not proposed and that has been commented on before in this hearing. And additional aspect however, is not just the availability of data, but also the complexity. All data can be made public, but it does not help, if the market parties cannot understand logically how it affects prices. Also in this sense, there is still a lot to be done to increase the understanding of the data that is made public. TSOs should also take into account, that different companies have different resources: big companies might be able to crunch anonymous data on critical branches and afterwards make educated guesses on where the critical branches are, small companies do not have such a possibility. Different levels of understanding are also not beneficial for market efficiency.</p>	2,3,4,5	Yes	<p>Fair point. The TSOs, acknowledge this in the supporting document: "The Nordic TSOs do, however, acknowledge that understanding the FB methodology and the impact thereof needs some training. The TSOs have therefore started some initiatives aiming at enhancing the understanding among stakeholders before go live with FB."</p> <p>The TSOs will facilitate a discussion among TSOs/stakeholders on what tool/info is needed to maximize transparency in due time before going into parallel run</p> <p><u>Action:</u> see earlier action</p>
11	<p>There must be several uncertainties in the reported calculations. However, the reported material do not consider any real sensitivity analysis, providing a convincing case that the rather small (relative the market size) welfare gains are indeed robust. Given that the reported welfare gains compared to the market size are very small it must be shown that the gains are positive within the error margins. It is probable</p>	4	No	<p>Indeed, as mentioned on pp. 79-81 in the supporting document, there are assumptions and uncertainties in the reported calculations.</p> <p>The upcoming parallel runs will provide more grip on the quantitative results.</p>



	that considering the errors we may have zero or even negative welfare changes.			
12	No proper assessment of the CNTC-alternative has been performed.	4	No	Indeed, the level of development is not that mature yet. However, the TSOs do not foresee a complete assessment on the CNTC as an alternative nor necessary if this proposal is approved.
13	The social welfare should be divulged per bidding zone.	4	Yes	The TSOs has added this to the supporting doc. Moreover, upon the stakeholders request, the simulation data of the 16 weeks has been shared and you are cordially invited to dive into the results. In these results the producer and consumer surplus are reported per bidding zone.
14	The welfare gain of flow based capacity calculation as compared to the NTC-method originates from a few weeks. An in-depth analysis should be made to investigate whether not similar results could be made by CNTC, and what was driving the results these weeks.	4	No	The target solution is FB for both DA and ID. The current NTC is used as a proxy for the CNTC. The TSOs do not foresee to allocate resources to do a full CNTC simulation
15	The way price formation is described in the consultation document; there would never be any risk as long as “the marginal generator” could be identified. In the TSO’s world demand has no room, as little as have any changes in other conditions (fuel prices, weather, outages, political and regulatory decisions affecting cross border trade, etc). It becomes an “economics 101” reasoning, where guessing the marginal generator is all there is needed. Given the fact that new plants are not built that quickly, meaning that the “cost curve” will remain fairly stable, an observer of the industry should be astonished that companies have need of modeling and analytical employees at all. Once, the TSOs seem to reason, we have established a marginal cost curve in a bidding zone it is just a matter of using UMMs and add/deduct from the stack accordingly. Fuel costs can effortlessly be added to this calculation. This could of course easily be done by a simple excel calculation. However, price formation in a real market is far more advanced and complex (cf Hayek 1945). That is why we still have better or worse traders and modelers. It is hardly a sufficient analysis of the impact of flow based (which we know	4	No	The comment is not clear and we don’t understand what the stakeholder is asking the TSOs.



	<p>increases divergence of area prices) to say that it is enough for the market actors to know the marginal cost of the marginal generator. In addition, it is important to understand that where the “marginal generator” is crucial. In the current setting it is straightforward to understand how competition occurs between generators in different bidding zones. In the flow based context this becomes opaque. Economics as an analytical tool does have its advantages but to use the static situation of the supply and demand intersection to explain the dynamics of price formation is clearly not sufficient. The confusion of the textbook economics description of what prices should converge to in the long run have been made a short run prescription in the analysis made by the TSO. This is even more worrisome considering that the modeling and results are taken from a period where most observers agree that we are far out of a long run equilibrium, thus prices hardly cover the full cost of generation, as the market is plagued with over capacity for different policy and regulatory reasons.</p>			
16	<p>We need to be informed how TSO will inform about capacities between bidding areas for at least the next 3 years, ref COMMISSION REGULATION (EU) No 543/2013 on submission and publication of data in electricity markets. In article 9 of this regulation it is stated that:</p> <p>“Transmission infrastructure TSOs shall establish and provide information on future changes to network elements and interconnector projects including expansion or dismantling in their transmission grids within the next three years, to the ENTSO for Electricity. This information shall only be given for measures expected to have an impact of at least 100 MW on cross zonal capacity between bidding zones or on profiles at least during one market time unit. The information shall include:</p> <ul style="list-style-type: none"> (a) the identification of the assets concerned; (b) the location; (c) type of asset; (d) the impact on interconnection capacity per direction between the bidding zones; (e) the estimated date of completion. <p>The information shall be published one week before the yearly capacity allocation but no later than the 15th calendar day of the month before the year to which the allocation relates. The information shall be updated with relevant</p>	6	No	This is relevant indeed, but not for the CCM proposal.



	changes before the end of March, the end of June and the end of September of the year to which the allocation relates.”			
17	<p>We are concerned when looking at socio-economic welfare (SW)</p> <ul style="list-style-type: none"> • Gains are based on very little data and prototype CGM • Data are not consistent for a coherent period, many hours are removed from the SW calculation • SW gain derives from mostly from 3 weeks. The cost of implementing is not factored in? • Lowering prices, will that affect the cost of renewables for consumers, thus reducing SW? • Reducing congestion rent, will that increase TSO tariffs, thus reducing SW? 	8	No	<p>Indeed, as mentioned on pp. 79-81 in the supporting document, there are assumptions and uncertainties in the reported calculations.</p> <p>The upcoming parallel runs will provide more grip on the quantitative results.</p>

13.11 Question 12

Please state any remarks or concerns to what extent the CCM proposal meets the objectives in Article 3 of the CACM.

Stakeholder response:

Response	Stakeholder(s)	Considered action to be taken	TSO answer:
<p>1</p> <p>See answer to question 8. In addition,</p> <p>(a) promoting effective competition in the generation, trading and supply of electricity;</p> <p>Impact on transparency and a much more complicated methodology may impact the relative strengths between large and small market participants.</p> <p>Note: comments below from stakeholder 4</p> <p>Swedenergy is uncertain if the CCM proposal improves the competition. Transparency of procedures alone is not enough, if market parties</p>	2,3,4,5	No	<ul style="list-style-type: none"> • If not taken into account in the supporting or legal document, a reasoning why • When taken into account, an explanation how and where <p>Fair point. The TSOs, acknowledge this in the supporting document: “The Nordic TSOs do, however, acknowledge that understanding the FB methodology and the impact thereof needs some training. The TSOs have therefore started some initiatives aiming at enhancing the understanding among stakeholders before go live with FB.”</p>



	<p>lack understanding of the logics of the outcome. Smaller market parties will be at a disadvantage when analyzing flow based price formation, if area price differences become seemingly stochastic.</p> <p>Swedenergy lack the information on how internal congestions are treated. Additionally, a description of alternative solutions such as countertrade and phase shifters, that could also contribute to align commercial and non-commercial flows, is missing. What are the cost and benefits of these alternative solutions? Swedenergy is uncertain whether flow based capacity calculation will contribute to better and more efficient investments, if market parties do not know, where the congestion is located and if critical network elements are kept anonymous.</p> <p>It seems that flow-based changes the dynamics with respect to the price formation and for example increase the amount of hours with price area differences. The reasons for having zonal rather than nodal pricing are foremost to make it easier to act and participate in trade over a larger geographical area. In that sense it seems flow-based and its rather stochastic impact on prices (especially with its non-intuitive version) will increase the obstacles for smaller actors, and at least given the current information it will increase the hedging costs for stakeholders active in more than one bidding zone. This can mean that the transaction costs to act cross-zonal, which is one of the fundamentals of the Nordic market with its 15 bidding zones, increases to a level where participants ceases that activity. We would have expected an analysis of these issues in the submitted consultation documents.</p>			
2	<p>(b) ensuring optimal use of the transmission infrastructure; and (c) ensuring operational security, and (d) optimizing the calculation and allocation of cross-zonal capacity:</p> <p>An optimization of capacity allocation using D-2 input data may imply that options of flexibility is lost or locked in.</p> <p>In addition, there is no optimization across time frames. Capacity for intraday trading might be reduced, which has a different value than capacity for day ahead, and which will become more important in the future given the increasing shares of variable generation. (note: additional comment from stakeholder 5)</p>	2,4,5	No	<p>As mentioned in the CACM and the supporting document, for the day-ahead market time-frame, the capacity calculation shall be based on the latest available information.</p> <p>Regarding optimization across time frames: It is not clear what is meant by optimization across time. However, if withholding of grid capacity from DA to be allocated in ID is meant, the TSOs do not see this as an</p>



				efficient or optimal solution. An efficient solution entails a high as possible utilization of grid capacity in the DA timeframe; we see no reason to decrease capacity DA if e.g. DA wind forecast is high in Denmark and water value is high in Norway.
3	<p>e) ensuring fair and non-discriminatory treatment of TSOs, NEMOs, the Agency, regulatory authorities and market participants; and (j) providing non-discriminatory access to cross-zonal capacity.</p> <p>Impact on transparency and a much more complicated methodology may impact the relative strengths between large and small market participants. The socioeconomic weighting methodology may also imply that some loads are made less important.</p> <p>It will also make it more difficult for customers with a hedging need to understand how and when they should hedge (Note: additional comment from stakeholder 4).</p>	2,4,5	No	<p>Fair point. The TSOs, acknowledge this in the supporting document on the pp. 114-117:</p> <p>“The Nordic TSOs do, however, acknowledge that understanding the FB methodology and the impact thereof needs some training. The TSOs have therefore started some initiatives aiming at enhancing the understanding among stakeholders before go live with FB.”</p>
4	<p>(f) ensuring and enhancing the transparency and reliability of information;</p> <p>The model is to some extent a move towards a “black” box where participants are less likely to be able to forecast the use of the transmission grid using their own resources and information.</p> <p>Indeed and in addition to the above, having the critical networks elements (the bottlenecks) secret from the market parties is a common problem cited in the CWE-region. It should therefore be a prerequisite that whatever causes bottlenecks and changes to the transmission capacity must be reported. Otherwise the underlying idea about informing market parties about changes through the UMM:s partly loses its meaning. A market party must be able to understand what it means to the market when a unit in one geographical area is having a problem. In today’s NTC-world this is very straightforward. In the future flow-based world it is not. It becomes even more opaque if the generation shift keys and the PDTFs are developed behind closed doors. It is clearly a step backward if we will in the future neither know what caused a bottleneck nor where it is located. (Note: comment from stakeholder 4)</p>	2,4,5	?	See the earlier action defined on transparency
5	A general comment regarding flow based	3,4	No	Fair point. The TSOs,



	<p>transparency: Van den Bergh et al (2016) points out that as flow-based as a methodology compared to the current NTC, is more strictly defined, thus in that sense flow based is expected to be more “transparent”. It should be clear. However, there is still room for the TSOs to set the parameters on the critical branches and thereby influence the results of the market coupling. (Marien et al (2013). Since the flow based methodology is more rule based and is supposed to include all parameters influencing the electricity flow, it allows market participants to ask more specific questions on how the TSOs manage their grid and on the alternative ways to address congestions, which were more difficult to ask in the NTC world, where only the NTC values are published. These questions are legitimate and should be addressed in the methodology in a more detailed way.</p>			<p>acknowledge this in the supporting document on the pp. 114-117:</p> <p>“The Nordic TSOs do, however, acknowledge that understanding the FB methodology and the impact thereof needs some training. The TSOs have therefore started some initiatives aiming at enhancing the understanding among stakeholders before go live with FB.”</p>
6	<p>Regarding transparency it is in our view also not certain, whether CNTC, based on a common grid model, could not be almost as “well-defined” as flow based. Van den Bergh et al write that, “once the capacity allocation parameters are determined, an ATC-value indicates more clearly which transmission capacity is available to the market, compared to the FBMC parameters [...]. Hence, from a market player’s perspective, the transparency of F(low)B(ased)M(arket)C(oupling) can be questioned”. We are therefore disappointed, that not more resources have been spent on setting up a working CNTC as an alternative.</p> <p>Thus a more formal version of the CNTC with more openness towards the regulators and the stakeholders of what is performed, how and why, likely would increase both “procedural” and “outcome” transparency. In the current proposal pro flow based it becomes important to weigh the positive benefits of procedural transparency with the negative costs to “outcome” transparency. (note: comment from stakeholder 4)</p>	3,4	No	The target solution is FB for both DA and ID. The CNTC is only proposed as an intermediate solution for the ID timeframe.
7	<p>Concerning the optimization of the allocation of cross-zonal capacity and the provision of non-discriminatory access to grid capacity, flow based can certainly make a difference. But again, we lack the transparency how internal congestions are treated. And we lack a description of alternative solutions such as countertrade and phase shifters, that could also contribute. What</p>	3,5	Yes	The TSOs has provided more clarity on treatment of internal congestions and an assessment of alternative solutions. See section on ACER recommendation.



	are the cost and benefits of these alternative solutions?			
8	We are uncertain, whether flow based will contribute to better and more efficient investments, if market parties do not know, where the congestion is located and if critical network elements are kept anonymous.	3	No	We fail to see the difference with today's situation.
9	(a) promoting effective competition in the generation, trading and supply of electricity; Currently no, maybe in the future given that the CCM is transparent for market parties and that they understand price formation and can form reasonable price expectations. In addition, seemingly stochastic variations between area prices and counterintuitive flows can decrease efficient market functioning. Especially smaller market parties, which lack sophisticated forecasting tools, will be at a disadvantage.	5	No	See earlier comments
10	(c) ensuring operational security; Yes, but the TSOs have managed to do so in the past with less sophisticated tools.	5	No	Times and needs are changing as described in the supporting document on pp. 25-27.
11	(g) contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union; As long as the location of bottlenecks in the grid is guesswork for market participants, they won't be able to take educated investment decisions. It might look different for TSOs and their grid investment decision, but they might lack acceptance from market participants for their investment decisions.	5	No	We fail to see the difference with today's situation.
12	(h) respecting the need for a fair and orderly market and fair and orderly price formation; Partly – the price formation if fair and orderly, but if market parties lack the understanding of the flow based solution, the prices might still be perceived as "unfair". In the long term this could lead to a lack of trust in the price formation, which is essential, if the market should continue to play it's important role.	5	No	Fair point. The TSOs, acknowledge this in the supporting document on the pp. 114-117: "The Nordic TSOs do, however, acknowledge that understanding the FB methodology and the impact thereof needs some training. The TSOs have therefore started some initiatives aiming at enhancing the understanding among stakeholders before go live with FB."



13	(i) creating a level playing field for NEMOs; Yes, but that is not relevant in this context – in the Nordics all NEMOs have access and can offer their services independent of the CCM chosen.	5	No	Noted.
14	(j) providing non-discriminatory access to cross-zonal capacity. Depending on which critical branches are activated and what parameters are set on the critical branch, flow based can give non-discriminatory access to cross-zonal capacity. To understand this, transparency would help. In addition, we lack information on other possible solutions to meet this goal such as the use of remedial actions, which can be used in combination with flow based or with other solutions.	5	No	Fair point. The TSOs, acknowledge this in the supporting document on the pp. 114-117: “The Nordic TSOs do, however, acknowledge that understanding the FB methodology and the impact thereof needs some training. The TSOs have therefore started some initiatives aiming at enhancing the understanding among stakeholders before go live with FB.”

13.12 Question 13

If you wish to give other relevant remarks please state these here.

Stakeholder response:

Response	Stakeholder(s)	Considered action to be taken	TSO answer:	
			<ul style="list-style-type: none"> • If not taken into account in the supporting or legal document, a reasoning why • When taken into account, an explanation how and where 	
1	System price calculation! There is need to analyse how current way to calculate system price will work in flow based calculated area prices. Would it be good time to change bases of system price. Would weighted areal system price function better after FB is in operation?	1	No	It is straight forward how System Price will be calculated in a FB world: same method as today; intersection of demand and supply without congestions
2	CNTC as an alternative solution has not been properly evaluated	3,4,5	No	FB is the preferred and default solution as can be read from the supporting document , hence we see no reason to do a full evaluation of CNTC as the result indicate FB as a better solution.
3	16 weeks of data produced while not using the	3,4,5	No	The purpose of parallel run is not



	final grid model are interesting, but not enough to base a decision on			<p>to judge whether to go FB. This decision was taking by the time of CACM development and is not up for discussion again. This was also clearly stated by the Nordic NRAs at the stakeholder forum (Feb 8, 2017).</p> <p>The objective of parallel run is twofold:</p> <ul style="list-style-type: none"> -provide comfort to stakeholders -secure a proper operation of the market <p>The upcoming parallel runs will provide more grip on the quantitative results.</p>
4	We would appreciate a more detailed discussion of ACER's proposal, fully taking into account possible remedial actions and find a good balance between costly capacity restrictions and costly remedial actions.	3,4	Yes	The ACER recommendation will be elaborated more upon, cf. previous answers.
5	The stakeholders have several times commented that they would prioritize flow based in the intraday, when better information is available. This has not been taken into account.	3,4,5	No	Answer provided above
6	Lack of transparency – anonymous data is not enough. It should be at least possible to publish data ex post, if operational security is the concern. Besides the project seems to have shared data with Norwegian master students (Jegleim, B. (2015). Flow Based Market Coupling (Master's thesis, NTNU. for example). While it is of course nice, that academic researchers have data access, it is alarming that market parties, where this data has considerable financial impact, have not.	3,4,5	Yes	See the earlier comments on transparency
7	Challenges for intraday trading, if flow based optimizes the market into a corner solution based on uncertain day-2 data.	3,4,5	No	The FB DA will be implemented first, being the biggest market, followed by a FB ID, as can be seen from the implementation timeline in supporting document. The intermediate ID CNTC CCM will be <u>a separate capacity calculation based on dedicated CGMs</u> , as explained on in the supporting document (not simply left-over capacity).
8	The hearing period of a month including several public holidays is too short to make a proper statement. We therefore reserve the right to	3,4,5	No	We will organize a public consultation on the legal document.



	make more comments, should more issues appear.			
9	<p>The use of the non-intuitive model and basing the proposal on that seems premature</p> <ul style="list-style-type: none"> o It diverges from the choice of CWE making market integration more difficult o It makes the use of flow based even more opaque as the capacity calculation is now not only affecting price formation in an opaque way but also forcing flows from high price areas to low price areas o A casual view on the data provided gives some rather large and strange price differences hours with non-intuitive flows. One example is 21 January, at 1700-1800 hours, where the result of the simulations leads to a very low rate of transmission capacity but still congestion occurs, this besides leading to adverse flows in Sweden and between Sweden and Finland. The fact that the simulations also indicate a ten folded raise in adverse flows, almost 9% of the period, is worrisome. 	4	Yes	See previous answers on FB intuitive above
10	<p>No real learning from what happens in the CWE w.r.t. flow based seems to be part of this process. Thus we seem to repeat all the mistakes done there.</p> <p>According to market participants from the CWE region, the Nordic Capacity Calculation Methodology proposal seem to have very limited learnings from the CWE flow based project. The proposed Nordic methodology should go over the central concerns and issues stated by market participants in the CWE region and address which of these concerns that are relevant in a Nordic context and how they are handled in the Nordic proposal. (Note: comment from stakeholder 6)</p>	4,5,6	No	The lessons learnt in CWE have been taken into account. Indeed, the ID capacity calculation is a dedicated capacity calculated based on dedicated CGMs (which is a different starting point then in CWE when going live)
11	<p>Given the current status of the material given in the consultation it is impossible to make any informed decision on neither flow based capacity calculation nor an improved coordinated NTC. Thus to avoid damaging a well-functioning market to meet a far too optimistic timeline, any decision should be postponed until a proper decision material is available. That material should also include an assessment of a continuation of the CNTC as a method.</p>	4	No	FB is the default method, cf. previous answers above
12	<p>In the current capacity calculation method (NTC), the “coarseness” of the method in itself gives</p>	4	No	Each capacity calculation timeframe is served by a



	<p>room for changes and actions intraday and in the balancing market. In itself that equalizes the weight of the day-ahead and intraday timeframe to some extent. By mathematically optimize the transmission capacity use day-ahead, based on d-2 data we will put the system on a constrained border in the flow based domain. There is no leeway for corrections. The stakeholders have repeatedly stated that this may pose a problem for system security, and that the flow based algorithm should include some margin for intraday use. However, this has been completely disregarded by the TSOs in the consultation document.</p>			<p>capacity calculation using the latest information available.</p>
13	<p>As stated, the TSOs approach the issue on price formation with a naïve view on dynamics. In particular, the view that price formation can be deduced from the static description of supply and demand begs several questions. Is there no uncertainty in the TSOs views? Is information and data the same as knowledge about fundamental relations in a market? Does a connection between short run prices and long term prices not exist?</p>	4	Yes	<p>Before and during parallel run we will discuss with stakeholders how to provide transparency, cf. previous answers above</p>
14	<p>The ACER principles have been dealt far too summarily. Just stating that the “Nordic system is so different that we don’t need to concern ourselves” does not suffice as an argument. That argument could then be used against the flow based capacity calculation method or in principal anything. Rather the principles should be considered in-depth, and especially the use of remedial action must be an integral part in the capacity calculation method. To state that “In the Nordic power system, a high share of the grid constraints is located inside bidding zones, not on the border” (p 37), and then argue for the use of flow based to decrease cross border flows, completely misses the intent in regulation 714 and the ACER (2016), which is to increase cross border trade. Internal congestion should be counter traded, in the long run transmission capacity should be physically increased or bidding zones should be re-defined.</p>	4	Yes	<p>The ACER recommendation has been elaborated more upon, cf. previous answers.</p>
15	<p>On a larger scale, all calculations should be Nordic and first we should strive for a true Nordic evaluation of all socioeconomic changes. Thus all TSOs should carry the same instructions that their actions should be beneficial for the Nordic market rather than a domestic welfare optimization. One way of solving this is to let a supranational body, for example the Regional</p>	4	No	<p>Noted</p>



	Operating Centers, as described in the currently proposed European legislation, make the decisions on CNEs, counter trade etc. In so far that we need to avoid that the TSOs push internal problems to the border by abusing the CNEs and security of system reasons rather than counter trading this can provide increased transparency and trust in the system.			
16	The overall idea with the flow based capacity calculation method is to align commercial and physical flows. There are alternatives to mathematical modelling. We suggest that phase shifters should be introduced as a possible solution, and that this option is considered as part of the overall solution package.	4	No	This is not in the scope of the Nordic CCM. See also previous comments above.
17	In order to ensure that structural congestion does not persist, there should be a transparent reporting on how many hours a given Critical Network Element is limiting the market, a transparent reporting on what remedial actions are taken to alleviate short term negative effects of a given CNE and a transparent reporting on how grid investment plans can alleviate structural CNEs in the longer term.	7	Yes	In due time before entering into the parallel run it will be discussed with stakeholders what statistics should be optioned during the runs (and potentially more permanently). <u>Action:</u> as described
18	In the CWE flow based implementation a minimum capacity domain was implemented to secure that significant decreases in cross border capacity would not appear. This minimum capacity domain has shown to be in use very frequently. Therefore, we would expect a minimum capacity domain in the Nordics also to ensure that cross border trade does not deteriorate.	7	No	See previous comments above
19	With the RSCs coming into action later this year, why are expected effects of this cooperation and the subsequently optimised NTC not taken into account in the decision of methodology choice?	7	No	“Optimized NTC” are not in scope as FB is the default solution, cf. CACM
20	Cost of implementing FB measured in € compared to SW could be elaborated on	8	No	An effort has been made to obtain numbers from members of the stakeholder group to get a grip on the potential adaptation of the stakeholders to a FB implementation. This was however not an exercise that lead to concrete quantitative results.
21	We see very little effort looking in to CNTC benefits. When comparing SW in FB and CNTC, NTC is used as a proxy, although TSO themselves say CNTC is a “highly automated version of NTC”	8	No	See previous comments on this above.



14 ANNEX II: Example calculation of nodal PTDFs

Figure 14-1 below shows a three-node network where the nodal transfer PTDFs are going to be calculated. The impedances of the lines are included in the figure, being the sum of resistance and reactance. The slack node is located in node 3 in this example.

The line resistance is considered negligible compared to the reactance (e.g. line 1-2 has a $2/0.01=200$ times higher reactance) and the DC power flow approximation is applied.

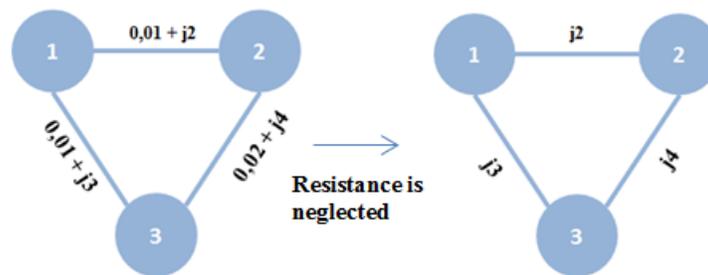


Figure 14-1 Example grid with three nodes. The node and line parameters used in the power flow equations are illustrated in the figure.

The Y_{bus} matrix is defined by the data in Figure 14-1. Recall that the susceptance between two nodes equals the inverse of the reactance for the line, since the resistance was neglected.

$$Y_{bus} = \begin{bmatrix} 1/2 + 1/3 & -1/2 & -1/3 \\ -1/2 & 1/2 + 1/4 & -1/4 \\ -1/3 & -1/4 & 1/3 + 1/4 \end{bmatrix} \quad (22)$$

The Z_{bus} matrix is then constructed by adding “+1” to the diagonal element corresponding to the slack-node in the Y_{bus} matrix in (22), followed by an inverse operation. Node 3 is in this example selected as slack node.

$$Z_{bus} = \begin{bmatrix} 1/2 + 1/3 & -1/2 & -1/3 \\ -1/2 & 1/2 + 1/4 & -1/4 \\ -1/3 & -1/4 & 1/3 + 1/4 + 1 \end{bmatrix}^{-1} = \begin{bmatrix} 3,00 & 2,33 & 1,00 \\ 2,33 & 3,22 & 1,00 \\ 1,00 & 1,00 & 1,00 \end{bmatrix} \quad (23)$$

The PTDF value from node n for the line between nodes i and k can then be calculated as

$$PTDF_{ik,n} = B_{ik}(Z_{bus_{in}} - Z_{bus_{kn}}) \quad (24)$$

For example, the PTDF value from node 1 to the line between node 1 and 2 can be calculated as



$$PTDF_{12,1} = B_{12}(Zbus_{11} - Zbus_{21}) = \left(\frac{1}{2}\right)(3,00 - 2,33) = 0,33 = 33\% \quad (25)$$

For production in node 1, 33% of the power will flow on the line 1 to 2. For consumption (which is the negative production) the effect will be the reverse, i.e. the line is loaded in the opposite direction.

For each line ik (row) and node n (column) the $PTDF_{ik,n}$ is calculated, resulting in the following PTDF matrix (nodal transfer PTDF matrix to be precise) with node 3 being the slack-node:

$$PTDF = \begin{array}{c} \text{Line} \\ \begin{array}{c} 1-2 \\ 1-2 \\ 2-3 \end{array} \end{array} \begin{array}{c} \text{Node} \\ \begin{array}{ccc} 1 & 2 & 3 \end{array} \end{array} \begin{bmatrix} 0,33 & -0,44 & 0 \\ 0,67 & 0,44 & 0 \\ 0,33 & 0,56 & 0 \end{bmatrix} \quad (26)$$



15 ANNEX III: Model set-up for the Case study NO3-NO5

The new line will between NO3 and NO5 provides a parallel path to the existing North – South interconnectors NO1-NO3 and SE2-SE3, which means that any trade between Northern and Southern Scandinavia will induce flows on all three interconnectors. This makes it challenging to determine the optimal capacities as all lines are influenced by transit flows from commercial exchanges on the other lines. The transit flows are disproportionately greater for the Norwegian lines due to the much greater transmission capacity on the Swedish side. FB has the potential to provide a better solution to this challenge by significantly reducing the uncertainty that accompanies the discrepancy between NTC market exchange and the realized physical flows.

The challenge described above, and the potential of FB to improve the situation, was explored using empirical data: a simplified PTDF matrix from the Samnett simulation model, and the optimization engine in Excel. The approach was to do a simplified price calculation (simulating the allocation mechanism) using both NTC and FB for individual hours, using historical NPs and prices as a starting point. The market flows on the borders congested in the historical market outcome were not allowed to increase, while the rest of the borders were considered open for additional trade. The effect of adding 100 MW CNTC capacity on the new line was compared to the FB solution (with no limit on the new line), and both were compared to the original market outcome.

An important effect of the FB set up was that the commercial flow on NO1-NO3 was no longer determined ex ante, but the flow was not allowed to increase compared to the CNTC market outcome.

The model set-up is illustrated in Figure 15-1, showing the data that went into the FB and CNTC models. All hours with significant price differences between 2.12.2013 and 15.1.2014 were analyzed individually, and the geographical scope was limited to Norway and Sweden.

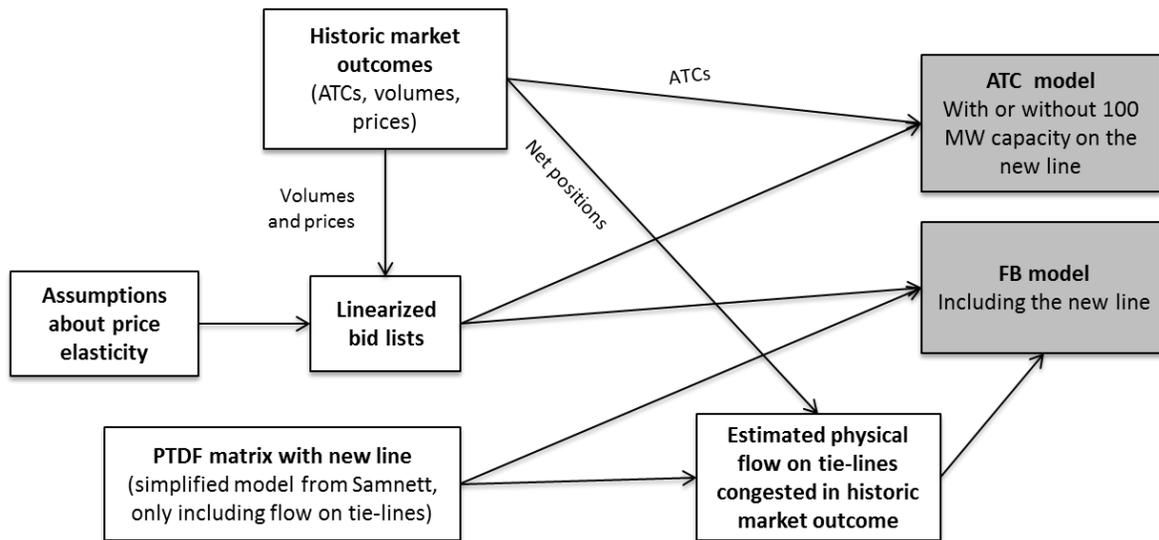


Figure 15-1 The model set-up

Figure 15-2 shows the simulated price difference between NO3 and NO5 (across the new line) using CNTC and FB. In most situations FB reduces the price difference compared to CNTC, which indicates a better utilization of the transmission capacity. FB provided an equal or better market outcome, measured as increased Nordic economic welfare, in every simulated hour.

The fact that the FB model had no limit on the flow NO3-NO5 seems not to be very significant as the maximum flow on the line was lower with FB than with CNTC, and since the average flow on this line increased barely 10 %. In fact the flow on the line NO3-NO5 was smallest with FB in 32 % of the hours, even though the Nordic welfare was higher in every case.

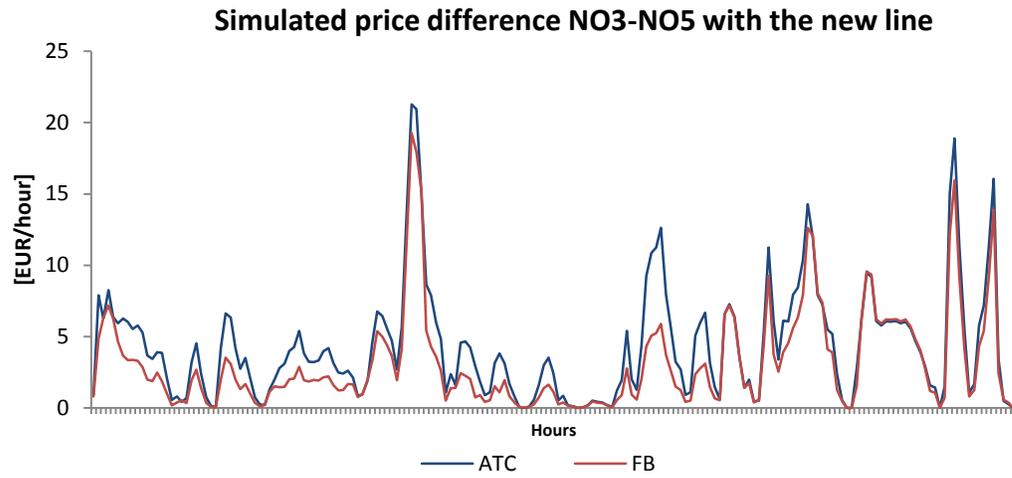


Figure 15-2 Simulation results for all historical hours with significant price differences in the Nordic system from 2.12.2013 and 15.1.2014



16 ANNEX IV: Detailed mathematical descriptions of power flow equations

Four parameters are related to each node in a power system: voltage magnitude U , voltage angle δ , active power P , and reactive power Q . A node is defined when all those parameters are known. In load flow analysis, nodes can be categorized in the following way, based on the parameters that are known:

- PQ node: P and Q are known, U and δ are calculated
 - usually load, can also be a generator with constant reactive power
- PU node: P and U are known, Q and δ are calculated
 - generator/generators
- U δ node: U and δ are known, P and Q are calculated
 - reference node (also called slack bus or swing bus)
 - voltage angle in reference node is the reference angle
 - needed to balance the load flow analysis in a way that generation equals load plus grid losses (losses are not known beforehand)

In a system with N nodes, the amount of known parameters is $2N$. Other parameters have to be calculated. Calculations can be done utilizing the node equations.

$$\begin{bmatrix} I_1 \\ \dots \\ I_i \\ \dots \\ I_N \end{bmatrix} = \begin{bmatrix} Y_{11} & \dots & Y_{1i} & Y_{1N} \\ \dots & \dots & \dots & \dots \\ Y_{i1} & \dots & Y_{ii} & Y_{iN} \\ \dots & \dots & \dots & \dots \\ Y_{N1} & \dots & Y_{Ni} & Y_{NN} \end{bmatrix} \begin{bmatrix} U_1 \\ \dots \\ U_i \\ \dots \\ U_N \end{bmatrix} \quad (27)$$

$$[I] = [Y][U] \quad (28)$$

$[Y]$ is a node admittance matrix

$[I]$ is a node current matrix

$[U]$ is a node voltage matrix

Active and reactive power flows in steady state can be calculated using the following equation:

$$\underline{S}_i = P_i + jQ_i = (P_{Gi} - P_{Li} - P_{Ti}) + j(Q_{Gi} - Q_{Li} - Q_{Ti}) \quad (29)$$

\underline{S}_i is the net apparent power coming to node i

P_i is the net active power coming to node i



Q_i is the net reactive power coming to node i

P_{Gi} is the active power coming to node i from the connected generators

P_{Li} is the active power from node i to the connected load

P_{Ti} is the active power going from node i to the connected transmission lines

Q_{Gi} is the reactive power coming to node i from the connected generators

Q_{Li} is the reactive power from node i to the connected load

Q_{Ti} is the reactive power going from node i to the connected transmission lines

For three nodes, the following equations can be developed.

$$\begin{aligned} \underline{S}_i &= \underline{U}_i \underline{I}_i^* = P_i + jQ_i \Leftrightarrow \\ \left(\frac{\underline{S}_i}{\underline{U}_i} \right) &= \underline{I}_i^* = \frac{P_i + jQ_i}{\underline{U}_i} \Leftrightarrow \\ \left(\frac{\underline{S}_i}{\underline{U}_i} \right)^* &= \left(\frac{\underline{S}_i^*}{\underline{U}_i^*} \right) = \underline{I}_i = \frac{P_i - jQ_i}{\underline{U}_i^*} \end{aligned} \quad (30)$$

Equation (1) can also be written as follows.

$$\begin{aligned} \underline{I}_1 &= \underline{Y}_{11} \underline{U}_1 + \underline{Y}_{12} \underline{U}_2 + \underline{Y}_{13} \underline{U}_3 \\ \underline{I}_2 &= \underline{Y}_{21} \underline{U}_1 + \underline{Y}_{22} \underline{U}_2 + \underline{Y}_{23} \underline{U}_3 \\ \underline{I}_3 &= \underline{Y}_{31} \underline{U}_1 + \underline{Y}_{32} \underline{U}_2 + \underline{Y}_{33} \underline{U}_3 \end{aligned} \quad (31)$$

By using this in the previous equation, we will have the following three-node example:

$$\begin{bmatrix} \underline{S}_1^* \\ \underline{U}_1^* \\ \underline{S}_2^* \\ \underline{U}_2^* \\ \underline{S}_3^* \\ \underline{U}_3^* \end{bmatrix} = \begin{bmatrix} \frac{P_1 - jQ_1}{\underline{U}_1^*} \\ \frac{P_2 - jQ_2}{\underline{U}_2^*} \\ \frac{P_3 - jQ_3}{\underline{U}_3^*} \end{bmatrix} = \begin{bmatrix} \underline{Y}_{11} & \underline{Y}_{12} & \underline{Y}_{13} \\ \underline{Y}_{21} & \underline{Y}_{22} & \underline{Y}_{23} \\ \underline{Y}_{31} & \underline{Y}_{32} & \underline{Y}_{33} \end{bmatrix} \begin{bmatrix} \underline{U}_1 \\ \underline{U}_2 \\ \underline{U}_3 \end{bmatrix} \quad (32)$$



$$\begin{aligned}
 \frac{\underline{S}_1^*}{\underline{U}_1^*} &= \frac{P_1 - jQ_1}{\underline{U}_1^*} = \underline{Y}_{11}\underline{U}_1 + \underline{Y}_{12}\underline{U}_2 + \underline{Y}_{13}\underline{U}_3 \\
 \frac{\underline{S}_2^*}{\underline{U}_2^*} &= \frac{P_2 - jQ_2}{\underline{U}_2^*} = \underline{Y}_{21}\underline{U}_1 + \underline{Y}_{22}\underline{U}_2 + \underline{Y}_{23}\underline{U}_3 \\
 \frac{\underline{S}_3^*}{\underline{U}_3^*} &= \frac{P_3 - jQ_3}{\underline{U}_3^*} = \underline{Y}_{31}\underline{U}_1 + \underline{Y}_{32}\underline{U}_2 + \underline{Y}_{33}\underline{U}_3
 \end{aligned} \tag{33}$$

Finally, the power flow equations for the three nodes will look as follows.

$$\begin{aligned}
 \begin{bmatrix} \underline{S}_1^* \\ \underline{S}_2^* \\ \underline{S}_3^* \end{bmatrix} &= \begin{bmatrix} P_1 - jQ_1 \\ P_2 - jQ_2 \\ P_3 - jQ_3 \end{bmatrix} = \begin{bmatrix} \underline{U}_1^* \underline{Y}_{11} & \underline{U}_1^* \underline{Y}_{12} & \underline{U}_1^* \underline{Y}_{13} \\ \underline{U}_2^* \underline{Y}_{21} & \underline{U}_2^* \underline{Y}_{22} & \underline{U}_2^* \underline{Y}_{23} \\ \underline{U}_3^* \underline{Y}_{31} & \underline{U}_3^* \underline{Y}_{32} & \underline{U}_3^* \underline{Y}_{33} \end{bmatrix} \begin{bmatrix} \underline{U}_1 \\ \underline{U}_2 \\ \underline{U}_3 \end{bmatrix} \Leftrightarrow \\
 \underline{S}_1^* &= P_1 - jQ_1 = \underline{Y}_{11}\underline{U}_1^*\underline{U}_1 + \underline{Y}_{12}\underline{U}_1^*\underline{U}_2 + \underline{Y}_{13}\underline{U}_1^*\underline{U}_3 \\
 \underline{S}_2^* &= P_2 - jQ_2 = \underline{Y}_{21}\underline{U}_2^*\underline{U}_1 + \underline{Y}_{22}\underline{U}_2^*\underline{U}_2 + \underline{Y}_{23}\underline{U}_2^*\underline{U}_3 \\
 \underline{S}_3^* &= P_3 - jQ_3 = \underline{Y}_{31}\underline{U}_3^*\underline{U}_1 + \underline{Y}_{32}\underline{U}_3^*\underline{U}_2 + \underline{Y}_{33}\underline{U}_3^*\underline{U}_3
 \end{aligned} \tag{34}$$



17 ANNEX IV: Results from the public consultation on the legal document

This document contains the responses from the stakeholder consultation, based on the version of the proposal for CCM for the Nordic CCR published on July 3 2017. The annex provides an overview of the responses received, and the names of the stakeholders that submitted the response.

Main messages from the stakeholders are:

- *“In general, the TSOs still propose actions to develop or evaluate methods and outcomes, in the legal document. However, most of the actions by the TSOs, not properly defined or developed in the legal document, should be subject to further regulatory approval. The suggested legal documents leaves far too much discretion to the TSOs.*
- *The flow based method should be implemented in the intraday time frame first as the possible gains seems far larger in that time frame. CACM does not specify that flow based day ahead should be implemented before flow based intraday, so there are no legal obstacles to make ID the priority.*
- *Flow based has been implemented with an intuitive version (preventing flows from high priced areas to low priced areas) in the CWE-region. There are two strong reasons to follow that approach also in the Nordic region. First, flows would follow logically from the bidding area prices. Second, the integration with the CWE-region would be smoother. (A third not discussed issue is how the congestion rents (positive and negative) should be shared across countries. It is not clear that countries that have invested heavily in their grid in so far that they have few problems should be penalized and have to pay to TSOs which have opted to have a weak grid. Thus the distribution of the congestion incomes and costs needs to be discussed in more detail in the legal document before any decision is taken).*
- *The material suggests very small benefits compared to the suggested change. That means that there is a small potential upside compared to a fairly large potential downside. Thus the sensitivity analysis that is now lacking needs to be done before any decision on the method is taken.*
- *The proposed method seems to be a way for the TSOs to legalize moving internal constraints to the border: "e.g. the true grid constraint is often not located at the bidding zone border, but within the bidding zone" (p 119 supporting document). However, the intention in regulation 714 on cross border exchange is NOT to hide internal constraints in mathematical formulas and thus moving internal bottlenecks to the border. If the constraint is temporary it should be dealt with by remedial action (e.g. counter trade), and if it is structural it should be dealt with by investing in the grid or redefining bidding zones.*
- *The transparency on what causes decreased capacity must be priority number one. Thus it is not acceptable to have critical elements that are kept secret or anonymized to the stakeholders.*



- *Minimum capacity on cross border exchanges should be guaranteed, for example by setting a minimum level of cross border capacities to 75% of thermal capacity. That is, flow based is constrained to at least give 75% of thermal capacity at each cross zonal border.*
- *It seems premature to take a decision on a method before it has been sufficiently proven that it will improve the Nordic electricity market. Thus any decision should be postponed until sufficient material exists to base an informed decision upon."*

17.1 Name of stakeholders

Stakeholder #	Name of stakeholder
1	Bixia
2	Danish Energy Association
3	Danske Commodities
4	E.ON Sweden AB
5	EFET, Eurelectric, Nordenergi, MPP
6	Finnish Energy
7	EPEX Spot
8	Fortum Oyj
9	Dong Energy
10	Jämtkraft AB
11	Nord Pool
12	Nordenergi
13	Shadow Analysis AB
14	Swedenergy
15	Vattenfall AB

17.2 Individual responses to the question raised in the consultation and TSO answer

The responses are listed in column 1 of the table in the following section. The stakeholder making the comment has been mentioned in column 2 according to the numbering in the table above. Column 3 indicates whether the Nordic TSOs will take the comment into account either in the supporting or the legal document. Column 4 includes the TSOs answers:

- If the comment is not taken into account in the supporting or legal document, a reasoning why;



- When the comment is taken into account in the supporting or legal document, an explanation how the comment is reflected and where.

Stakeholder response:

Response	Stakeholder(s)	Considered action to be taken	TSO answer:	
1	TSOs still propose actions to develop or evaluate methods and outcomes, in the legal document. However, most of the actions by the TSOs, not properly defined or developed in the legal document, should be subject to further regulatory approval. The suggested legal documents leaves far too much discretion to the TSOs.	1, 8,9,10,12, 13, 15	Yes	<ul style="list-style-type: none"> • If not taken into account in the supporting or legal document, a reasoning why • When taken into account, an explanation how and where <p>The Nordic TSOs made an effort to clarify the proposal further for elements that are not yet developed and/or tested in detail.</p>
2	<p>FB shall be implemented in ID market frame first.</p> <p>Stakeholder 9 and 12 further emphasize that TSOs must jointly work to get XBID working, and as soon as possible, start a project for flow based capacity calculation for intraday.</p> <p>Stakeholders recognize that XBID is currently not compatible for flow based and that intraday is in some way depending on the rerun of the Common Grid Model, that apparently can't be done before 10 pm in the evening.</p> <p>Nevertheless, stakeholders would prefer if the TSOs made some commitment about making intraday capacity available at a reasonable hour, either by committing to give left-over capacity from the day ahead immediately, or by running separate Nordic capacity recalculations.</p> <p>Stakeholders would also like explanations of how borders with counterintuitive flows in the day ahead are handled in the intraday.</p> <p>Stakeholder 15 welcomes a more qualitative elaboration on the relevance of</p>	1,4,10,9,12,13,14,15	Yes / No	<p>The concerns of the Stakeholders with regard to the Nordic ID gate opening time has been addressed (though it is not part of the CCM project).</p> <p>The FB DA will be implemented first, being the biggest market, followed by a FB ID. The IT, processes, and experiences gained on the DA can then be applied to successfully map it to the ID timeframe, which – indeed - is more challenging given the tight timings.</p>



	<p>introducing FB in ID before DA. Stakeholder 15 fully understands that it is more challenging to fit such a demanding process in the much shorter intraday timeframe, and we are aware of the limitations set by XBID functionality. And we do understand that the cost-benefit assessment signal positive net value for the DAM. But, as uncertainty on outcome, per definition is greater the longer time there to the delivery hour, maximizing the capacity allocated at the DAM time scale should come at a cost of lost flexibility (as the grid utilization is higher). How are these “system margins” affected by the move between NTC and FBMC? It has been our argumentation that a parallel implementation of flowbased for ID would allow to use those extra margins of the system, when the actual outcome of the system may be better forecasted. With reference to the limited estimated socioeconomic gain for the DAM market we have proposed to hold the implementation until a proposal for a parallel implementation would be ready. Why cannot the Nordic TSO ask for an exemption until the solution for intraday is available?</p>			
3	<p>Intuitive patch shall be activated. Stakeholder 4 emphasizes on intuitiveness being logical and easy to understand for stakeholders. Other stakeholders also indicate that it would be smoother to integrate with CWE.</p>	1,4, 10, 13, 14,15	No	<p>Whether the Nordic region is using the intuitive patch or not, has no influence on the integration with the CWE approach. Also note that the question whether or not to continue the use of the intuitive patch in CWE is still under discussion by the CWE NRAs.</p>
4	<p>Further analysis (e.g. CBA) on intuitive model shall be done. Stakeholder 9 and 12 prefer to see more analysis comparing both flow based intuitive and flow based without patches. CWE has for various reason chosen flow based intuitive, Nordenergi would at least like to have the possibility to compare, since price formation would be easier to understand.</p>	4, 6, 8, 9,11, 12, 13, 15	Yes	<p>The Nordic TSOs think that non-intuitive FB should be the default solution, for the argument of socioeconomic welfare. Having non-intuitive flows is not due to malfunctioning of the model, but an efficiency gain of FB and a result of the interplay of power system physics (path of least resistance) and the</p>



				<p>difference in marginal costs of generators (and willingness to pay of consumers).</p> <p>Nordic TSOs welcome a discussion on the stakeholder's needs / benefits to have the intuitive patch activated before committing to such an exercise / test.</p>
5	<p>The CCM supporting document material suggests very small benefits compared to the suggested change. That means that there is a small potential upside compared to a fairly large potential downside. Thus the sensitivity analysis that is now lacking needs to be done before any decision on the method is taken. Stakeholder 4 further indicates that without Intuitive patch activated and CGMs in the simulation, the actual outcome/effect/benefit of these factors is really unknown. Stakeholder 6 requests 18-month test period. Stakeholder 11, 9, 12, 14 indicate an at least 12-month test period is needed, with quality success criteria fulfilled.</p> <p>Stakeholder 9, 12, 14 state that it is not clear whether the 16 weeks represent a comparison with reality or if it is only one model run compared with another model run. If it is the latter, the empirical material needed to make a decision on is missing. We understand from the roadmap, that the decision taken now is "just" a decision to develop flow based further and not necessarily the decision to introduce flow based. This, however, will need to be confirmed to avoid applying a CCM that is unreliable.</p>	1,4,6,8,9,10,11,12,13,14,15	No	<p>The downside of introducing a FB mechanism is not obvious to the Nordic TSOs. Moreover, FB is the target model for capacity calculation as stipulated in CACM.</p> <p>The Nordic TSOs propose to address those potential downsides during the discussions in either the stakeholder groups or stakeholder forum meetings.</p> <p>With regard to the parallel run the following. The Nordic TSOs commit to, at least, a six month parallel run period, using the industrial tool on a daily basis. The implementation timeline, and as such the DA FB go-live date, are depending on quality criteria to be met.</p>
6	<p>The proposed method seems to be a way for the TSOs to legalize moving internal constraints to the border: "e.g. the true grid constraint is often not located at the bidding zone border, but within the bidding zone" (p 119 supporting document). However, the intention in regulation 714 on cross border exchange is NOT to hide internal constraints in mathematical formulas and thus moving internal bottlenecks to the border. If the constraint is temporary it should be dealt</p>	1,2,4,6,8,9,10,13,14,15	Yes	<p>The Nordic TSOs altered the text to be more clear on the application of non-costly and costly remedial actions in capacity calculation to allow for an increase in remaining available margin (RAM) on grid constraints or cross-zonal borders.</p>



	with by remedial action (e.g. counter trade), and if it is structural it should be dealt with by investing in the grid or redefining bidding zones.			
7	<p>The transparency on what causes decreased capacity must be priority number one. Thus it is not acceptable to have critical elements that are kept secret or anonymized to the stakeholders (stakeholder 1,8). Transparency to understand price formation and power plants availability/revisions and (re)investments. CWE can be a transparency reference (stakeholder 6).</p> <p>Stakeholders appreciate if there was a strong commitment to transparency in the legal proposal. Stakeholders recognize the potential overlap with Regulation (543/2013) on Electricity Markets Transparency, but we would appreciate an explicit article in the methodology, saying that the TSOs commit to publishing all market relevant information ex ante (models/PDTFs etc) and ex post (close to real time if necessary). There must be a transparent reporting on what causes trade between bidding zone to deviate from what is maximal trade capacity. Thus, the idea proposed by the TSOs to have unknown and secret critical elements affecting trade is not sufficient. All elements that affect cross-zonal trade should be known to the actors. The CWE has had a similar discussion from which the Nordic TSOs could learn.</p> <p>Stakeholder 7 supports the establishment of the forums ensuring the market communication in the Nordics and are fully committed to facilitate the process to contribute to the better understanding of the Nordic market participants.</p>	1,3,6,7,9, 10,12, 13,14,15	Yes	<p>We agree that transparency on the capacity calculation is key for the market participants to understand and anticipate the price formation.</p> <p>The Nordic TSOs – after this public consultation period – would like to take up the dialogue with the stakeholders on this topic (in the framework of the Stakeholder Group). Indeed, we need you to explain what you need and why you need it, and how implementation of FB changes this needs (or not).</p>
8	<p>Minimum capacity on cross border exchanges should be guaranteed, for example by setting a minimum level of cross border capacities to 75% of thermal capacity. That is, flow based is constrained to at least give 75% of thermal capacity at each cross zonal border.</p>	1,4,8,10, 13, 14,15	Yes / No	<p>The Nordic TSOs altered the text to be clearer on the application of non-costly and costly remedial actions in capacity calculation to allow for an increase in remaining available margin (RAM) on grid constraints or cross-zonal borders.</p>



9	Overall, it seems premature to take a decision on a method before it has been sufficiently proven that it will improve the Nordic electricity market. Thus any decision should be postponed until sufficient material exists to base an informed decision upon.	1,8,10, 11,9, 12,	No	The Nordic TSOs commit to, at least, a six month parallel run period, using the industrial tool on a daily basis. The implementation timeline, and as such the DA FB go-live date, are depending on quality criteria to be met.
10	Stakeholder would like to see results from FB when the grid is stretched, both in over-supply and under-supply situations. The market needs transparency, otherwise the risk premiums will automatically go up, and thus minimizing the social welfare which is expected from FB.	3	Yes	The Nordic TSOs will continue their simulations with the FB capacity calculation and allocation. Indeed, this allows the Nordic TSOs to finetune the methodology and to learn about its performance under different situations.
11	Stakeholder would like to see how UMM on power plants affect the PTDFs	3	Yes	The Nordic TSOs – after this public consultation period – would like to take up the dialogue with the stakeholders on this topic (in the framework of the Stakeholder Group).
12	Stakeholder asks what Long term forecast of PTDFs are.	3	Yes	The Nordic TSOs will initiate the work on the Long-term capacity calculation as required by the Forward Capacity Allocation (FCA) GL.
13	The stakeholder is not convinced that the CNTC would not fit the Nordic market better.	4, 13, 14,15	No	The Nordic TSOs made an effort to elaborate on this in the explanatory document.
14	There must be incentives for the TSO to maintain and develop strong grids which should be reflected in how the congestion income is shared between the involved TSO (stakeholder 4). The proposed model includes non-intuitive flows, and following those, “negative” congestion rents. The TSOs propose to submit a proposal on how to “share” congestion income between the borders with positive congestion rent and borders with negative congestion rent. Since this cost – and benefit sharing implies transfers of wealth across country	4, 6,8, 10,9,12, 13, 14,15	No	Congestion income sharing is touched upon in the explanatory document to illustrate how this can work under a FB regime. The work on congestion income sharing is done on European level and is closely followed by the Nordic CCM project.



	borders, we expect the Nordic TSOs to draft a formal proposal for regulatory approval. It must also take into consideration that there should be a balance between the fairness in sharing rents, and the incentives to maintain and improve the grids (stakeholder 6).			
15	<p>Ensure a better digital processing of data to make maximum use of flexibility options, i.e. real-time data exchange and data management (15min slots) also to use x border flexibility.</p> <p>When calculating capacity flows and prices in both the DA and ID markets there must be a balance between the importance of calculating the (theoretical) right price and how late you can start the calculations. It is important to ensure that the input information is as close as possible to the calculated time frame, when both consumption and production will be more volatile in the future as we will have more intermittent production and more customers using solutions for energy reduction or flexibility.</p>	4	No	The Nordic TSOs, in their CCM, rely on dedicated CGMs, that are reflecting the latest information.
16	<p>Lack a clear explanation, what could be RSC's role in capacity calculation process. The proposal seems to expect that each TSO will do its own capacity calculation based on common methodology and information provided by the RSC. However, RSC isn't mentioned in the proposal. This is, irrespective which methodology for capacity calculation will be used, un-ambitious. Capacity calculation should be a centralized function, where the RSC is given responsibility to approve which constraints are taken into account in the calculation and do the calculation</p>	6,9,12, 14,15	No	<p>The Nordic RSC is referred to as a "CCC" in the CCM proposal. CCC stands for Coordinated Capacity Calculator as referred to in the CACM GL.</p> <p>The RSC's tasks are regulated by the System Operations Guideline.</p>
17	<p>Non-discriminatory access to CZCs: The non-discriminatory access to Cross-Zonal-Capacities (CZCs) stated in Whereas 6 of the proposal constitute a key prerequisite for effective competition and shall ensure a level playing field among NEMOs in the region. We hence support the TSOs' objective to have such equal treatment both for CCR Nordic internal and adjacent bidding zone borders. Pursuant to the Third Energy Package and CACM Regulation, access to CZCs shall be</p>	7	Yes	The Nordic TSOs appreciate the support.



	guaranteed in all Nordic countries on a non-discriminatory basis both for the Day-Ahead and Intraday timeframes.			
18	<p>EU harmonization:</p> <ul style="list-style-type: none"> In case FB MC should be implemented in the Nordic region, stakeholder 7 favors using the same input data and format for the algorithm as today for the CWE FB. Stakeholder 7 supports harmonization with the model implemented by CWE TSOs and strongly supports using the same standards, interfaces and formats for the implementation of FB MC in the Nordic region. Harmonization will not only facilitate pan-European TSOs cooperation but also allow fostering operational and cost-efficiency for NEMOs operating across European CCRs. 	7	Yes	The Nordic TSOs are happy to take these suggestions for the FB implementation on board.
19	Flow based methodology, if implemented, can be taken in use first in Spot and with gained experience in the future it could be used in Intraday as well. Priority in intraday trading should be to secure swift trading, assuring that flow based does not create adverse delays in trading, due to calculations of transfer capacities and such after each trade.	8	Yes	The Nordic CMM is in line with this view.
20	An interim period using the coordinated capacity approach for the Day Ahead as well as for the Intraday market frame will improve the reduce the risk of unforeseen disadvantages such as price divergence and adverse flows. An interim period with a coordinated net transmission capacity approach will provide the relevant standard of comparison to the flow based approach.	9	No	The Nordic TSOs propose to have FB capacity calculation for both the DA and the ID timeframes. For the ID timeframe an intermediate capacity calculation, based on CNTC, is proposed.
21	CCM proposal and supporting document are not really accessible and possible to understand for most of market participants. Some of the responses must be made with information gathered in meetings and discussions with colleagues in the energy business community.	10	No	<p>The Nordic TSOs put a significant effort into the development of the materials, and we are sorry to hear that the materials are not accessible / hard to understand.</p> <p>Indeed, we welcome all to</p>



				attend the Stakeholder Forum meetings to ask questions / clarifications. We also welcome stakeholders to pose questions on the Stakeholder Information Platform (http://nordic-rsc.net/questions-answers/).
22	Impact assessment is not properly done. Socioeconomic welfare” isn’t a calculation of Socioeconomic welfare per true definition. even worse this isn’t a proper calculation of the welfare distribution. You can’t use maximum price in day ahead bids as base for revenue in consumer surplus, a large portion of purchase in the day ahead market don’t set maximum price (other than price roof) in the bids since the price is already hedged, this applies for many of the purchase made by retailers (Today 2017-07-12, in our retailing business, we are buying more than 75% of our need without price limitation, due to that our customers will use the energy regardless of price since it already been hedged). The method gives too high value to consumer surplus. A new or adjusted model is needed. If you look at bid data from day ahead you find out that 85-90% of the purchase bids isn’t priced at all, this isn’t a fair value of price dependency, since this is a value after the hedging and before intraday actions.	9,10, 12, 14,15	No	The socio-economic assessment is a comparison in terms of socio-economic indicators between the FB methodology and the currently-applied NTC methodology. In the allocation mechanism, the bid data used is the actual bid data submitted under the currently-applied NTC methodology. Or in other words: we run two times an allocation with the same order books, once with a FB domain and once with the operational NTC domain. The Nordic TSOs consider this to be a reasonable approach to assess the impact of introducing a FB capacity calculation, compared to the existing and operational NTC methodology.
23	It is necessary to also linked to those DA FB/CNTC tests generate the ID CNTC capacities that would be the result of such DA Coupling based on FB/CNTC model	11	Yes	The Nordic TSOs received this request earlier during the Stakeholder Forum as well. The project will perform tests on the ID capacities after the DA FBMC.
24	Monitor continuously line availability and compare between flow based and NTC, to see where more capacity is made available and where less.	9,12,14,15	Yes	The Nordic TSOs are performing weekly simulations where - amongst others - the flows and the trade possibilities are compared.



25	It is possible for the Nordic TSOs to use the CNTC as an exemption of using FB. Without using the exemption, it implies that the Swedish and Norwegian TSO should lower the G-tariff to a European level and abandon the (ab)use of the exemption in regulation EC838/2010. Additionally, the Nordic TSOs should implement the Forward allocation code to the letter and start offering long term capacity rights. It is not sufficient to point to the target model as a reason for implementation of the flow based capacity mechanism!	13,14,15	No	The Nordic TSOs are keen to implement the FB methodology as it is assumed to ensure optimal use of transmission infrastructure and optimize the calculation and allocation of cross-zonal capacity. Indeed, the Nordic TSOs started their joint work / study on the FB methodology back in 2012, well before the CACM GL entered into force.
26	Very early, in the first meetings of CCM stakeholders and TSOs, in 2012, the stakeholders were promised that a parallel process evaluating the possibility of continuing with CNTC was ongoing. Very late in the project, the same TSOs declared that this had not been done and that there was no intention of doing it. Such a breach of trust creates "badwill" and hampers serious discussions on real issues.	13	No	The Nordic TSOs, back in 2012, referred to their operational NTC methodology as "CNTC". Indeed, already today a significant level of coordination is applied among the Nordic TSOs. This "CNTC" is not the one referred to today, in the CACM GL and the one referred to in our CCM proposal. We apologize for any miscommunication. The terminology that we used in those days, has been adopted to label something different.
27	Legal impediments to introduce an acceptable version of flow based capacity allocation must be included in the overall assessment of the viability of the method in question. For example if Swedish law prevents the publication of Critical Network Elements, and this is an important piece of information to the stakeholders if flow based capacity allocation method is used, this in itself may be reason enough to not implement flow based capacity allocation.	13, 14,15	No	The Nordic TSOs see the introduction of a FB capacity calculation and allocation as a big change; just like you. All the more reason to carefully manage the process. Indeed, the implementation timeline shows conditional steps. Only if sufficient quality and reliability can be established it can go live.
28	Stakeholder 7 supports the consideration of previously allocated CZC for determining CZCs for the Intraday	7	Yes	This is indeed in line with the Nordic CCM proposal.



	<p>timeframe, and stresses the importance of the recalculation of the capacity domain by TSOs after the DA FB MC allocation. This recalculation should be based on an updated Common Grid Model (CGM) taking into account exchanges on CCR external borders as outlined in Art. 24. We support a close cooperation among TSOs and CCCs from different CCRs for a coordinated calculation of the CGM. Stakeholder 11 also indicates the need to use CGMs for a more appropriate DA CNTC comparison with FB.</p>			
29	<p>Maintain online a documentation describing the applied capacity calculation methodology, including full details on how all parameters of the capacity calculation methodology are set.</p>	5	Yes	<p>The Nordic TSOs consider this to be a valuable suggestion. For example with regard to the GSK strategy, the proposal has been adjusted so that the TSOs publish the strategy applied.</p>
30	<p>Specify explicitly what the market time unit is</p>	5	No	<p>It is outside the scope of this proposal to define the market time unit.</p>
31	<p>Whether “controlled” deviations are considered or not in the setting of transmission reliability margins.</p>	5	Yes	<p>Controlled deviations are not reflected in the RM values. Note in this respect that there are no PSTs in the Nordics.</p>
32	<p>Costly remedial actions should be systematically considered in the capacity calculation</p>	5	Yes	<p>The Nordic TSOs altered the text to be more clear on the application of non-costly and costly remedial actions in capacity calculation to allow for an increase in remaining available margin (RAM) on grid constraints or cross-zonal borders.</p>
33	<p>Comparison between flow based and CNTC in the Nordics is also not sufficient.</p>	5	No	<p>The Nordic TSOs did not compare FB and CNTC due to lack of good quality CGMs.</p>
34	<p>The starting point of CCMs should be that no internal constraint is considered. The proposed approach to define a fixed PTFD threshold under which CNEs should be disregarded from the FB domain computation does not provide any consideration for the economic efficiency of the restrictions. No justification is</p>	5	Yes	<p>The Nordic TSOs altered the text to be more clear on the application of non-costly and costly remedial actions in capacity calculation to allow for an increase in remaining available margin (RAM) on</p>



	<p>provided. A more dynamic approach should be put in place, where CNE are only limiting relevant flows and only where economically efficient.</p> <p>Also, where TSOs intend to consider voltage or network stability issues in capacity calculation, the involved TSOs should make the demonstration that these phenomena are significantly influenced by cross-zonal exchanges and that the proposed restriction is economically efficient.</p> <p>We consider that undue discrimination may only be avoided if there is a clear justification - based on an economic efficiency assessment - for the selection of internal network elements as critical network element.</p>			<p>grid constraints or cross-zonal borders. Costly RA may only be applied in the case that they are available and more efficient in accordance to Article 21.1.b of CACM Regulation.</p>
35	<p>TSOs provide no detail on how TSOs will assess and report interdependencies between Channel, CORE, and Hansa regions.</p>	5	No	<p>The RSCs should have a role in this in the future. Specific processes for this still need to be developed and outside of the scope of this proposal.</p>
36	<p>Provide information on:</p> <ul style="list-style-type: none"> - The Common Grid Model used for capacity calculation (including expected flows on all CNEs), - The full list of non-anonymous Critical Network Elements (or elements likely to limit cross-zonal capacities in case of CNTC) to be considered in capacity calculation. - Operational Security Limits and Reliability Margins on all CNEs - PTDF or extent to which cross-zonal flows affect the CNE for CNTC. - The methodologies and the results of the “likely market directions” that are used in the capacity calculation. Transparency on the methodology should be included in the CCM. The daily information of these likely directions should be published as soon as available. - Full transparency on the GSK methodologies. We are opposed to vague elements such as “custom” GSK. A fully transparent and prescriptive methodology should be adopted. In addition, 	5	Yes	<p>The Nordic TSOs – after this public consultation period – would like to take up the dialogue with the stakeholders on this topic (in the framework of the Stakeholder Group). Indeed, we need you to explain what you need and why you need it, and how FB changes this needs (or not).</p>



	operational transparency on GSKs, i.e. the value per node and per hour. - “Basic” elements such as the definition of “peak” and “off-peak”. By observing GSK patterns (where already in place), we have the impression that the definition of “peak” does not correspond to the market definition (i.e. H9-H20 weekdays). - Vertical Load should be broken down into final load and RES/distributed generation (similar breakdown as foreseen in the ENTSO-E Transparency Platform)			
37	Commitment towards “qualitative” transparency (e.g. alerting the market of seasonal FMAX changes, the Standardized Procedure for Assessing the Impact of Changes – SPAIC) should be formalized in the binding documents	5	No	SPAIC is CWE-specific. The Nordic TSOs are open to discuss these / similar elements in dialogue with the stakeholders (in the framework of the Stakeholder Group).
38	Historically realized and forecasted flows on CNE should be part of the list of indicators followed by NRAs.	5	No	The NRAs have access to all data that they consider relevant.

17.3 Individual comments to the articles in the legal document and TSO answer

Old article(paragraph) – new article(paragraph) - response			Stakeholder (s)	Considered action to be taken	TSO answer:
0(4)	0(6)	§4 concerning Article 3(f) CACM – we would appreciate a new transparency article in the methodology, to underline the TSOs commitment to publish all price relevant data.	12,14	No	<ul style="list-style-type: none"> • If not taken into account in the supporting or legal document, a reasoning why • When taken into account, an explanation how and where <p>The Nordic TSOs – after this public consultation period – would like to take up the dialogue with the stakeholders on this topic (in the framework of the Stakeholder Group). Indeed, we need you to explain what you need and why you need it, and how</p>



					implementation of FB changes this needs (or not).
0(4)	0(6)	§4 It is not enough to “state facts”. The Nordic proposal still confuse a “transparent” procedure (“look, this is how we do the sums”) with a transparent outcome (these are the market prices). It can be questioned whether a non-intuitive flow based capacity allocation, and prices in Northern Sweden and Finland reflecting that there is a lack of grid in southern Norway, can be called transparent. Thus it may be questioned whether this proposal really fulfils the criteria as stated in 3f in CACM. In addition, it still needs to be proven that the proposed method really optimizes grid use. By having secret critical elements, and systematically pushing internal congestion to the border, it seems that contrary to the intention of Regulation 714 that this proposal decreases cross border trade. This is also unfortunately what has been observed in the CWE-region.	13,14	Yes	The Nordic TSOs have elaborated more on how the CCM proposal meets the objectives of the CACM Regulation.
0(5)	0(7)	"§5 The claim that the proposed method increases competition seems vague and disregards the fact that the most important and observable outcome in a market is the prices. We are as of now unaware that there has been a competitive issue in the Nordic markets as the TSOs define it in the paragraph. As the price formation becomes distorted when the TSOs leave the idea of sustaining “copperplates” within a bidding zone and starts pretending that we have a nodal system in the Nordics, it is not clear how competition is improved. In what sense can any market actor change behavior when flow based is introduced and thus improve competition? Is it easier for actor to enter the market after flow based is introduced?"	13, 14	Yes	The Nordic TSOs have elaborated more on how the CCM proposal meets the objectives of the CACM Regulation.
0(5)	0(7)	"Whereas, (5): “The CCM for the CCR Nordic promotes effective competition in the generation, trading and supply of electricity, as the CCM supports fair and equal access to the transmission system. The flow based capacity calculation methodologies does not implicitly pre-select or exclude bids from market players and, hence the competitiveness of bidding is the only criteria on which bids of market players are selected during the matching, yet taking the significant grid constraints into consideration. “ In the price calculation, the main criterion is welfare maximization. Define how this is equivalent with “competitiveness of bidding”?"	11	No	Please refer to the Euphemia descriptions.
0(6)	0(8)	"Whereas, (6): We agree with these general theoretical goals. However, the simulation results so far have demonstrated major issues in the treatment of market parties especially in countries with multiple bidding zones."	11	No	The Nordic TSOs are happy to discuss the simulation results.
0(6)	0(8)	§6 This paragraph uses a circular logic by claiming that	13, 14	No	The supporting



		since flow based optimizes grid use, grid use is optimized. Economic efficiency seems to be defined as minimizing the work load for the TSOs rather than actually making the market function better. The TSOs seem to miss the points in why we have chosen a zonal approach for markets in the Nordic (contrary to a nodal approach) as we want liquidity in all timeframes and across all markets.			document motivates how FB improves capacity calculation and allocation. Moreover, FB is the legally prescribed target model for capacity calculation.
0(7)	0(9)	"Whereas, (7): Operational security. What does this imply? Is it possibly understood as that internal Bidding Zone constraints are indirectly to be pushed to BZ borders via the Critical Grid Limitations built in to the FB PTDF matrix? If that is the case then how is that justifiable? Also, what does mid-term mean in terms of time and what would be the criterion for moving to Bid Zone reconfiguration rather than implementing limitations via the FB PTDF matrix?"	11	Yes	Please refer to Article 8 and 11, for more details.
0(7)	0(9)	§7 This must be closely monitored to by the regulators so that the TSOs are not allowed to use flow based capacity allocation method to push internal bottlenecks to the bidding zone borders. We wish a continuous assessment of where countertrade and redispatch could be included in a beneficial way to keep cross border capacity open.	12, 13, 14	Yes	Please refer to Article 8 and 11, for more details.
0(8)	0(11)	§8 This states that transparency will improve but not how. As part of the transparency issues concern the black box approach inherent in the proposed model this claim has to be explained and validated. As mentioned above, we would appreciate an article with a clear commitment to transparency and a list of items to be published (in which frequency, at which point in time (ex post/ ex ante) in an annex as part of the guideline.	9, 12, 13, 14	No	The Nordic TSOs – after this public consultation period – would like to take up the dialogue with the stakeholders on this topic (in the framework of the Stakeholder Group). Indeed, we need you to explain what you need and why you need it, and how implementation of FB changes this needs (or not).
0(8)	0(11)	"Whereas, (8): Transparency. We agree that transparency should be ensured properly, but we are worried how this requirement can be fulfilled since we have earlier been informed that there are no plans to publish which Critical Grid Elements are considered in the formation of PTDF matrixes. In the simulations, we have also seen that for significant portions of time, there is considerably less Cross Zonal capacity utilised in DA FB than what was the case in production with NTC. We have also seen significant price differences between Bidding Zones in the FB results while there were no such differences in NTC based production model."	11	No	The Nordic TSOs – after this public consultation period – would like to take up the dialogue with the stakeholders on this topic (in the framework of the Stakeholder Group). Indeed, we need you to explain what you need and why you need it, and how implementation of FB



					changes this needs (or not).
0(9)	0(12)	§9 Given the lack of transparency on critical network elements, it is difficult to see how clear investment signals are given to market participants. Moving internal constraints has rather the opposite effect, as problems are not being dealt with where they occur. For the stakeholders, the price formation occurring in the flow based context seems more stochastic and thus decreases the efficiency in the price formation that the current pure zonal market model allows.	12, 13, 14	No	The Nordic TSOs – after this public consultation period – would like to take up the dialogue with the stakeholders on this topic (in the framework of the Stakeholder Group). Indeed, we need you to explain what you need and why you need it, and how implementation of FB changes this needs (or not).
0(11)	0(15)	"Whereas, (11): Conclusion. It would benefit understanding this methodology if the general objectives were listed here. This is an unsubstantial claim that does not seem fitting to have in a CACM Methodology. There is no clear evidence in simulations performed by the Nordic TSOs supporting this claim."	11	Yes	The Nordic TSOs have elaborated more on how the CCM proposal meets the objectives of the CACM Regulation.
2	2	"Article 2 should be completed as it does not contain all the terminology and abbreviations used in the rest of the document (like CZC)."	5, 12, 14	Yes	This article has been amended. Please note that terminology already defined in other legislation is not repeated here.
2(2)	2(2)	"Article 2.2: "forecast on a nodal basis". Is this limited to the Critical Grid Elements (Critical Branches) within each existing Bidding Zone, or does it go even further than that and if so how is it to be enabled on a daily basis to do such a base case with any level of precision?"	11	No	Please refer to the explanatory document for a more detailed description.
3(4)	3(4)	Article 3, 4 i): Intraday trade. How is intraday possible to treat as an uncertainty for RM values given that ID trade is free to be done based on needs and opportunities arising after DA trade is concluded up until close to real-time?"	11	Yes	This was a mistake; it has been corrected. ID trade is not part of the FRM.
3(5)	3(5)	"Article 3(5): The last sentence of this article opens the possibility for TSOs to apply different risk levels for different constraints. Does that mean that TSOs may use different criteria for different congestions? Or does it mean that the resulting risk level may be different for different congestions, but that the method and criteria that are used are the same? (The risk level has an important impact on the RM and therefore on the available cross-zonal capacities.)"	5, 11, 12, 13, 14	Yes	The Nordic TSOs agreed to use a risk level of 95% as a starting point. This is now reflected in article 3(5).
3(7)	3(7)	Article 3, 7: RM values. Is it also a correct assumption that these RM values would be published to the market?"	11, 12,	Yes	The Nordic TSOs are considering to publish



		It for us seems like a necessity that it is done."	13, 14		the elements of the RAM, including FRM.
4	4	All limits and parameters should be specified and any deviation from a Nordic standard should be explained. This should be subject to approval from all regulators	11, 12, 13, 14	Yes	Article 4 has been adjusted to reflect that the TSOs shall apply same operational security limits as in operational security analysis
6(2)	6(2)	Ref 6 (2) We appreciate that the TSOs need to clearly justify to market participants all the allocation constraints they want to apply. We agree that this should also apply to ramping constraints. Their sizes and application should be clear, and we appreciate evidence that ramping constraints are kept to a minimum.	12, 14	No	In line with CCM proposal
6(2)	6(2)	"Article 6.2. Very good with this transparency. However, one question is, if this will apply both for DA and ID allocation and regardless of if FB or (C)NTC method would be used?"	11	No	This article applies for both DA and ID.
6	6	"Article 6. The TSOs need to clarify when the critical elements are structural or not. This to avoid that structural congestion is moved to the border. There should explicitly be stated on which lines there are ramping constraints, what they are and ample evidence that the constraints are kept to a minimum."	13	No	Article 6(2) indicates that "... the allocation constraint with the applied limits and communicate these transparently to the market participants with a justification".
7(2)	7(2)	Article 7.2 "Each TSO, subject to peer review and stakeholder consultation and regulatory approval, shall select GSK strategy..." Ref 7 2. (b) Why does the article mention only non-flexible supply, which shall be ignored, but not non-flexible load?	12, 13, 14	Yes	Article 7 has been amended. In 7(1) it now states: "The forecast shall take into account the information received in accordance to Article 10 and Article 12 of the generation and load data provision methodology." 7(2) now lists the various GSK options. 7(3) specifies that the strategies applied are communicated to the market participants. The use of load depends on the LSK component (please refer to table 1 that has been added to the legal



					proposal).
7(2)	7(2)	"Article 7, 2. Will GSK strategy and the values themselves be published by TSOs to the market as a whole or to/from individual market participants? Article 7.2d "either during all hours for a year or for a single hour. It certainly does not seem realistic with a precise difference between all individual hours, but surely there should be considerations made linked to Peak and Off Peak, and weekday and weekend hours, and not least based on seasonal differences in available generation units and consumption needs. Will GSK values be made transparent to all market participants?"	11	Yes	Article 7 has been amended. 7(3) specifies that the strategies applied are communicated to the market participants.
7(5)	7(5)	In addition, we suggest a new 7 (5): The TSOs shall publish their ex-post analysis and its results at least once a year."	12, 14	No	Article 7 has been amended. 7(3) specifies that the strategies applied are communicated to the market participants. Article 7(5) is unaltered.
8	8	"It is unclear what mechanism will ensure that remedial actions are used to increase the capacity given to the market when it is economically efficient. The TSOs should include a procedure to continuously assess efficiency of the use of remedial actions to increase the capacity given to the market. This procedure should be subject to regulatory approval and the operational choices on including or excluding remedial actions should be reported regularly to the regulator. All actions should be exposed to stakeholder consultations and in the end for regulatory approval. In addition, we suggest a new 8 (6): this yearly review shall be made public."	2, 12, 14	Yes	The Nordic TSOs altered the text to be more clear on the application of non-costly and costly remedial actions in capacity calculation to allow for an increase in remaining available margin (RAM) on grid constraints or cross-zonal borders. Costly RA should only be applied in the case that they are available and more efficient in accordance to Article 21.1.b of CACM Regulation.
8	8	"Article 8. All actions should be exposed to stakeholder consultations and in the end a regulatory approval"	13	No	The CCM proposal is subject to public consultation and regulatory approval.
8	8	"Article 8.2 "Each TSO shall take into account RA in capacity calculation. Is this to be understood as that all TSOs within the (Nordic) CCR shall jointly consider RAs provided from all of them in order to within security limits maximize the RAM across the sum of all CZ ICs in the CCR? It seems important that such collaboration is ensured because only via sharing of RA will the capacity allocation be efficient, e.g. maximize capacity within security constraints including usage of RA."	11	No	Please refer to Article 8(1).
9(1)	9(1)	"Article 9.1: ... shall be flow-based ... It is not clear	11	No	Intuitivity is an



		whether it refers to the FB intuitive or non-intuitive model, nor does the ""Whereas"" justify which model is to be used or clarifies possible amendment of FB or CNTC model over time."			allocation constraint that may be applied.
9(5)	9(5)	"Article 9(5) is unclear. What is advanced hybrid coupling? What are virtual bidding zones? How does this affect the results of the capacity calculation?"	5	Yes	A definition of Advanced Hybrid Coupling has been added to Article 2. Please refer to the explanatory document for more details.
10(3)	11(3)	"Article 10(3) refers to the BZ review process. This article should be removed, as the scope of the CCM is to calculate capacities given a certain BZ configuration. Moreover, this article is biased towards splitting of zones, whereas absence of congestions could also be mentioned as an indication to merge bidding zones.	5	No	Article 11(3) follows up on paragraph 9 from the Whereas.
10(2)	11(2)	2) should be subject to regulatory approval. As a main principle, bidding zones' internal congestions should not be approved, and hence taken care with remedial actions, such as counter trade.	12, 13, 14	Yes	This has been captured in the new Article 30
10(4)	11(4)	Article 10(4) mentions that "... only those grid constraints that are significantly influenced by the cross-zonal exchanges, as defined in Article 5 of this Proposal, will be included in the capacity calculation." However Article 5 does not define what means "significant". Actually the proposed CCM does not contain a method for the selection of CNEs."	5	Yes	Article 11(4) has been amended. An article on CNE selection has been added (Article 10).
10	11	"There is a fundamental lack of including remedial actions as a means to avoid undue discrimination. In applying grid constraints on cross-border trade, TSOs must continuously document and justify that it is economically efficient or ensuring operational security to curtail interconnectors rather than using remedial actions. Furthermore, structural congestion should be considered in grid investment plans also when they do not pose a cost to TSOs (as remedial actions) or a revenue opportunity (via market split).	2, 12, 14	Yes	Article 11(4) has been amended.
10	11	3) Per definition an internal constraint should not limit cross border exchange. This should be dealt with by counter trade, zone delimitations and by building new capacity. To move internal congestion to the border is against Regulation 714/2009, and most likely it constitutes an abuse of dominant position as market participants outside the zone is discriminated against. Thus, the TSOs need to quantify what they consider being a non-structural critical element that could be included in the calculations. Flow based methodology should not be a carte blanche for the TSOs to move any congestion to the border. This sub point refers to the	12, 13, 14	Yes	Article 11(4) has been amended. An article on CNE selection has been added (Article 10).



		<p>bidding zone review process, and should not be included since the CCM is about calculating cross-zonal capacity given a certain BZ configuration. The review of the BZ configuration is a different topic addressed in the CACM regulation. Even so, if the same internal grid constraint regularly limits the cross zonal capacity exchange, there are different ways to address it, as stated above, however, the article is biased towards splitting of zones, whereas absence of congestions could also be mentioned as an indication to merge bidding zones.</p> <p>4) Seems to pre-suppose that the method of moving internal congestion to the border is ok, without mentioning the alternatives redispatch/countertrade, that might be more beneficial compared to reduced cross-border capacity. While it is positive that elements, that do not significantly influence cross-border capacity are taken out of the methodology, it is equally important to be transparent about which elements are taken in and why. However, article 5 does not define ""significant"". The proposed CCM does not propose a method to select CNEs. In our view, the selection of CNEs, which are not tie lines, should be based on economic efficiency and security of supply criteria (as mentioned in Article 10 (1)). The CCM should contain a selection method describing how these two conditions economic efficiency and security of supply are met.</p> <p>7) subject to regulatory approval. These thresholds should even be part of the legal proposal and as such should be added. In addition, we propose a new 10 (9): The TSOs shall publish their yearly evaluation."</p>			
11	12	<p>"In the former consultation, we highlighted that in the CWE flow based implementation a minimum capacity domain was implemented to secure that significant decreases in cross border capacity would not appear. This minimum capacity domain has shown to be in use very frequently in the CWE region and therefore, we would expect a minimum capacity domain in the Nordics also to ensure that cross border trade does not deteriorate. This article could include a minimum cross-zonal capacity guarantee, e.g. 75% of thermal capacity. This would ensure that flow based capacity allocation is not used to move internal bottlenecks to the borders. The point referring to PTRs should be deleted or re-phrased. PTRs should be understood as intermediate solutions, and if used, subject to UIOSI-principle. Hence, they should not affect the capacity calculation. If they do, either the TRs or capacity calculation methodology (or both) are ill-planned."</p>	2, 12, 13, 14	No	<p>Please refer to the amended article 8 in this respect as well.</p> <p>PTRs with a UIOSI still have the possibility to be nominated, and - if this is the case – need to be taken into account.</p>
11	12	<p>"Article 11.1 b). While we also have reservations against the idea of pre-allocating CZ IC capacity for Ancillary Services the question here is if such usage would be transparently presented to the market before the DA</p>	11	No	Noted



		Coupling takes place? To us it seems critical that it is done, among others because otherwise some parties may be in an insider position by having sold or bought power volumes in such Ancillary Services prior to DA/ID Coupling."			
14	15	<p>"Article 14.1 "negative RAM". Negative RAM values are not supported by the Euphemia algorithm - is that considered in the formula, i.e. that negative RAM values will be set to zero? Regardless of that it seems unjustified to build into the FB model an allowance to force power flow from one BZ to another BZ even in the case when the theoretical RAM would be computed to be negative. It is questionable both from a competition perspective and from the perspective of what the consequences on prices will be from such a forced action that does not reflect market order surplus or deficit for the BZs most affected by the given CNE RAM.</p> <p>Article 14.6. "... TSOs applying FAV shall be transparent towards the CCC and other TSOs about the information applied in FAV". What about transparency towards market parties since it will affect the overall available CZ capacity for DA in and linked to the Nordic CCR?</p> <p>Article 14.7 "The FB approach shall allow for negative RAMs". Negative RAMs are not supported by Euphemia algorithm. See also our earlier comment."</p>	11	No	<p>Indeed, the RAM may be negative. If needed, the requirements of Euphemia may be altered.</p> <p>Please also refer to Article 17(3).</p> <p>The Nordic TSOs are considering to publish the elements of the RAM, including FAV.</p>
15	16	This article refers to the coupling to other regions via Advanced Hybrid Coupling (AHC). The method is described for the Hansa region in a separate hearing. Regarding the Hansa region, the method sounds like CCR Nordic and CCR CORE are optimized first, and that the flow in Hansa is a function of the first two regions rather than a separate optimization.	5, 12, 14	Yes	<p>A definition of Advanced Hybrid Coupling has been added to Article 2.</p> <p>Please refer to the explanatory document for more details.</p>
16	17	"Article 16 is unclear. Article 16(1) suggests that validation is done to check whether additional capacity can be made available. However article 16(4) and 16(5) make it clear that cross-zonal capacity can also be reduced. In such case, there is no transparent justification. Article 26 of the CACM Regulation requires a validation process, however in accordance with Articles 27 to 31 of the CACM regulation, which is not ensured by this Article 16 of the CCM."	5, 12, 14	Yes	Article 17 has been amended.
16	17	"Article 16.3. What methodology and Article 21b(vi) is referred to here? At least there is no Article 21b(vi) in this proposal."	11	Yes	Article 17 has been amended.
17(1)	18	"Article 17. While Nordenergi, with the evidence provided so far, questions the feasibility of flow based for day ahead markets (very small upside and a large possible downside), we encourage continuing the work and focusing on intraday markets. We propose that as soon as possible a project should be established for	9, 12, 13, 14	Yes	Article 18 has been added to capture this.



		implementing flow based for intraday. This, however, should not delay the implementation of XBID."			
17(2)	19(1)	"Article 17.2 a) Is this primarily to be understood as the outcome of the DA Coupling plus any significant grid/prod/cons outage with effect on the coming delivery day that occurred after DA GCT, or which will take place soon, and has effect on availabilities for the next day?"	11	No	Indeed.
17(4)	19(3)	Article 17.4. What is meant by ""rules for sharing power flow capabilities...."" and where are those rules presented and how are they justified?"	11	No	Please refer to Article 25(4).
18	20	This article seems to be connected to Article 10, the inclusion of critical network elements within bidding zones and the justification for doing this. Again, we underline the need for transparency and justification, if a critical network element within a bidding zone is included as this is in reversal to the intentions of Regulation 714/2009. If the bottleneck is of a structural nature, the bidding zone question needs to be raised. This should however not be part of the CCM since it is part of the CACM regulation and Art 18 (2) should therefore be removed. Again, we want to underline, that a bidding zone review should also lead to a merger of zones, in case there is no congestion.	9, 11, 12, 13, 14	No	Noted
18(2)	20(2)	"Article 18(2) should be removed as it is out of scope. The scope of the CCM is to calculate capacities given a certain BZ configuration. Moreover, this article is biased towards splitting of zones, whereas absence of congestions could also be mentioned as an indication to merge bidding zones."		No	Article 20(2) follows up on paragraph 9 from the Whereas.
19	21	The impact of the article is unclear. What happens if previously allocated capacity is bigger than CZC on a bidding zone border and the CZC is set at zero? Does this mean that the TSOs expect a N-1 violation to happen? And if so, will remedial actions (including redispatch and countertrading) be taken? And if so, why are such remedial actions then not applied in other situations to increase CZC?	5, 12, 14	Yes	The article has been amended.
19	21	"Article 19 "In case previously allocated capacity..." It seems like an anomaly that more CZC would be allocated ex-ante to DA Coupling than what is existing CZC for given CZ IC. Apart from that it should be said that capacity set to zero would only apply in the flow direction of the pre-allocated capacity, thus in the opposite direction the pre-allocated capacity should be added to the available capacity (i.e. netting to be applied)."	11	No	This situation only applies for the transitional time period where DA FB is functioning together with the intermediate ID CTNC approach. Capacities are calculated to both directions and netting is applied as defined in ID algorithm.



21, 22	23, 24	"Articles 21 and 22. Understood, but does it mean that a new computation based on those rules is to take place when the results from DA Coupling is taken in to consideration? It seems like the latter is critical since DA Coupling provides a good estimate for what will be the outcome tomorrow except for unexpected outages of grid/prod/cons not yet known and any significant forecast ""error""."	11	No	Indeed, the ID capacity calculation is based on a dedicated CGM. See also Whereas paragraph 3.
23	25	"Article 23. It does not seem clear to us how all the rules stated in Articles 23 plus 24 relate to or supersede what is stated in the preceding Articles 17 to 22 - all of which relates to how to compute available cross zonal capacity for ID timeframe using the CNTC approach. Can this be more clarified in a subsequent version or in supportive documents? Article 23.4.b) "current sharing rules". What are those ""current sharing rules"" and are they described transparently in some document available for market parties?"	11	Yes	This article has been amended. With regard to the current sharing rules, a reference to the relevant document has been added.
24	26	"Article 24 mentions that capacities on bidding zone borders between CCR Nordic and neighbouring CCRs shall be calculated and these calculated capacities shall be taken into account in the capacity calculation in the CCR Nordic. However, it is unclear how this works. In particular, would it not make more sense to calculate expected flows (instead of capacities) on the bidding zone borders between CCR Nordic and neighbouring CCRs?"	5	No	As an example: when a DC link in the CCR Hansa is out of service, the impact of such a fact is taken into account in the CCR Nordic.
24	26	"Article 24.1. What is meant by ""relevant information"" and does it include consideration of DA Coupling results? The latter seems very logical and justified since the DA Coupling results represents the best starting point for a forecast of pros/cons per BZ and BZ-to-BZ flows in and linked to Nordic CCR. Article 24.2. What is the rationale for that? Is there not to be a CGM and applicable RA etc. that enables a more justified capacity made available then simply the lowest of two or more values?"	2	No	Please note that this article falls under Title 5 and refers to the ID capacity calculation. Indeed, DA market coupling results are taken into account. The rationale is that each CCR makes an effort to provide the maximum capacity.
26	28	"Article 26 does not give the frequency of reassessing of the intraday capacity, which is a requirement; see Article 21(2) of CACM Regulation."	5, 12, 14	Yes	This article has been amended.
28	31	The article states that the approval should be given by all national regulatory authorities in the Nordic CCR, which by definition excludes the Norwegian regulator. As Norway is part of the synchronous area, how is this approached formally?"	13, 14	No	Statnett will send the CCM proposal for information to NVE, indicating that they would like to follow the CCM proposal.



28	31	<p>"Table 1, 4 "the whole MRC". By the time of this possible implementation there will be Single DA Coupling in place that in itself is larger than DA MRC, thus better to say geographic scope of SDAC.</p> <p>Table 1, 4 "At the minimum 6 months of continuous parallel runs where". Why 6 months? A minimum of 12 months is recommended to simulate all the seasonal variations of the Nordic power system. Quality criteria needs to be defined if parallel run results are going to be used for final approval.</p> <p>Table 2 #Milestone. Why is there no comparable parallel run period as for DA to provide transparency on what the CNTC based capacities for ID would be as a result of FB allocation in DA? It seems like time period for go-live of Nordic ID using CNTC needs to be coordinated with timeline for DA.</p> <p>Table 2 CNTC go-live. Why would Nordic CNTC go-live for ID be dependent of if ID XBID is ready to support FB approach?</p> <p>Table 2 FB go-live. Why is this FB go-live added here when there are no criterion given for it related to ID?"</p>	11	Yes	<p>The article has been amended.</p> <p>The continuous parallel run is based on industrial CGMs, industrial tools, and market simulations in real NEMO systems. This (at least) 6-months period is preceded by at least one year of FB market simulations. This should cover all seasonal variations.</p> <p>The Nordic TSOs received this request earlier during the Stakeholder Forum as well. The project will perform tests on the ID capacities after the DA FBMC as soon as CGMs with sufficient quality are available.</p> <p>The criteria refer to "criteria to be met before moving to the next milestone".</p> <p>This question is not clear.</p>
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