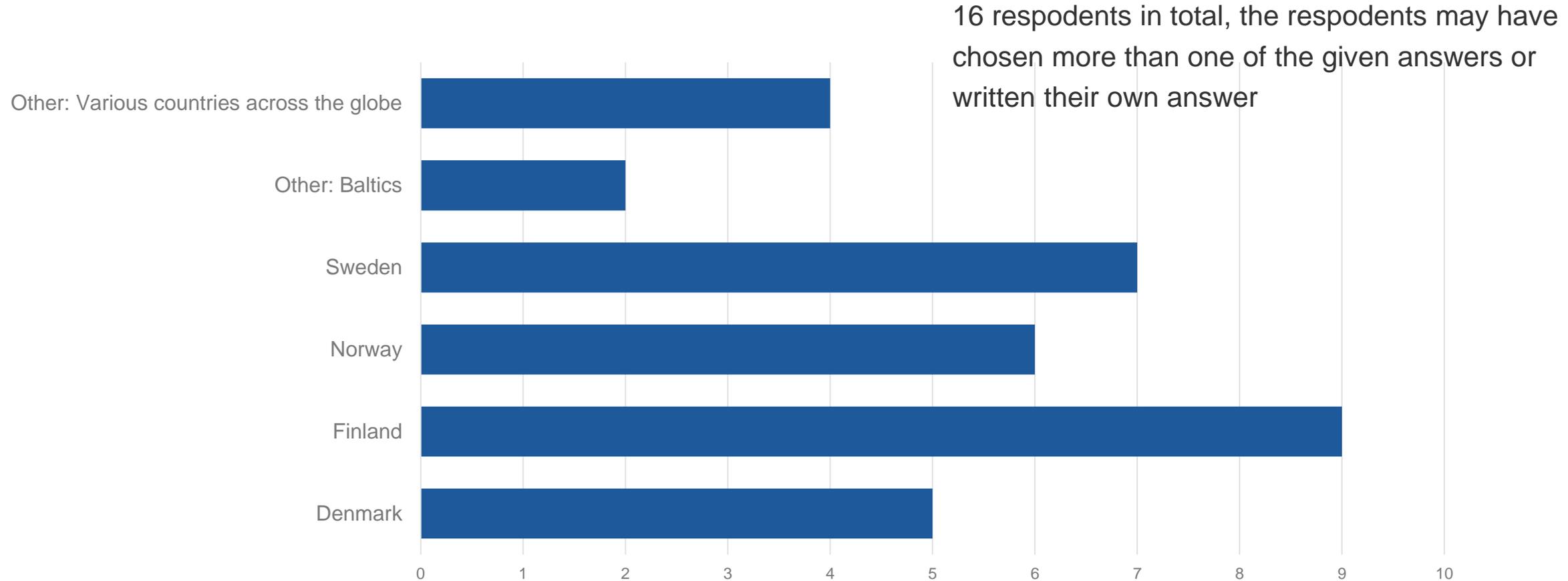


Consultation feedback

In which country is your organisation based?



General feedback (questions 1-3)

- More information in general is asked for:
 - Details of the markets, for example pricing of balancing energy and imbalances.
 - What will be the concrete effects for stakeholders and their IT-systems, business processes and business strategies?
 - There should be more visibility to costs and budget of the NBM program
- Timelines:
 - Should be realistic rather than overly ambitious
 - NRA processes and main risks should be visible
 - Exact dates of (at least) 15 min ISP and single pricing model are needed
- Better reasoning/analysis are needed:
 - Reasoning of the proposed roadmap and choices made
 - Why long delay is needed? How the delays will affect to socio-economic gains?
 - Do the TSOs have a right plan to go for new Nordic markets, why not go for European solutions (MARI, PICASSO)?

aFRR capacity market (question 4)

- General support for implementation of Nordic aFRR capacity market
- Almost all respondents have concerns regarding XB reservation methodology
- Support for quick implementation of marginal pricing

mFRR capacity market (question 5)

- Stakeholders in general think that implementation of Nordic mFRR capacity market is not a priority

Single price model (questions 6-8)

- MP support quick implementation of the single price model
 - Prefer implementation in accordance with EBGL (that is by Q1/2021) of single price model simultaneously in all Nordic countries.
- MP see no need for a simultaneous implementation with 15 min ISP.
- Does not regard TSO operational concerns in some geographical areas and operational situations as a major drawback/wants more details concerning this.

15 minutes resolution (question 9-10)

- a postponement to Q4 2022 is reasonable in order to make the necessary preparations in an orderly way.
- MP stress that the new date for implementation of 15 min ISP presented in the revised roadmap should be firm.
- DSO has another perspective than producers. DSO's emphasis on coordination with development of datahubs.
- NEMO as soon as possible, DSO not a hurry and producers are happy with the timeline. Want a realistic plan.
- Important to have 15 minutes' products available at least in ID-markets, but preferably also in DA-markets by when Nordic bidding zones swift into ISP 15.

mFRR balancing processes automation (questions 11-15)

- Standard products, mFRR balancing processes automation and AOF's, should be described better and as early as possible.
 - Harmonization between NBM and the European platforms when the latter are put into operation is important.
 - Standard products that are being introduced, as well as how the market participants shall interact with the TSO should be described as soon as possible
 - Better explanation of what bid filtering is.

Outlook for energy activation markets (question 16)

- Support for European balancing markets and platform.
- Seamless transition between the NBM platforms for aFRR and mFRR activation products and the similar European platforms MARI and PICASSO
- The presented Road Map doesn't describe harmonization and integration process in sufficient detail. The final Road Map should comprise implementation deadlines for what TSOs describe as '2nd generation NBM', as this is where full integration with European markets is expected.

Stakeholder involvement (question 17)

- Satisfied with the gradual increase of stakeholder involvement, but more is needed
 - Webinars and video conferences were asked for
 - Continuous update of plan on the website

Draft plan for update of the NBM roadmap



- Publication of updated NBM roadmap
- Start of 15 min ISP exemption process
- Start of NBM Target model project