

To the Nordic Balancing Model co-operation

19.11.2020

Feedback to common market design – Single Price

Energy Norway refer to the information published on the NBM website 9th of October and welcome the opportunity to give our feedback on the proposed common Nordic market design for the common imbalance settlement model with associated design, which is proposed to be implemented in the Nordics on 1 November 2021.

Our main views are the following:

- Energy Norway supports the overall proposed market design of Single Price, Single Position
- We understand the TSOs needs to limit the BRPs incentives for self-regulation and the direct requirements which already apply to this effect, but would encourage the TSOs to also seek a market-based approach to avoid incentivising self-regulation going forward
- To secure a level playing field in national, Nordic and European balancing markets, it is essential that the same terms and conditions apply to all market participants, and the Nordic NRAs and TSOs should seek to achieve that during the national implementation processes that will take place
- The BRP balancing fees should be based on a polluter-pays principle, and the cost distribution between fees and transmission tariffs should reflect this and be harmonized as far as possible in the Nordics to promote an effective market for balancing services and reduced overall costs

Energy Norway has no further comments to the model suggested by NBM and remain available to elaborate on any of the above.

Best regards,

Toini Løvseth, Director
Energy Norway



Per Arne Vada, Policy Advisor
Energy Norway



www.energinorge.no

Postboks
7184 Majorstuen, 0307 Oslo

Besøksadresse
Middelthuns gate 27, 0307 Oslo

Telefon
(+47) 23 08 89 00

E-post
post@energinorge.no

Tilsluttet:

