

This statement is on behalf of Tafjord Kraftproduksjon AS, Istad Kraft, Troms Kraftproduksjon AS and Tussa Energi AS

We all support the proposal of "Single Price Single Position" model containing the change from two to one balance price for Norwegian BRP's. This means harmonization of the balancing standards for all producers regardless of size or technology, which we support. We assume that the players still are obliged to bid in within balance and that the intraday market is a good tool for improving balance towards operating hours. We ask for positive measures that can further strengthen the intraday market. We see it as an advantage that as much of the turnover as possible, after spot, takes place in the intraday market, not left behind for the imbalance market. For a producer with great flexibility and good mechanisms for trading in this market, there is a good income potential in increased liquidity. Nevertheless, significant imbalances will not be known in time for intraday trading and will still end up in the imbalance market.

With the introduction of one-price, Statnett again emphasizes that imbalances are undesirable and that the players must avoid this. The intention is thus that the RK-market should be reserved for unexpected imbalances, not imbalances that one has time to get rid of in the market.

Nevertheless we are concerned about the dramatic increase in volume fees and imbalance fees for the balance market from 2021 and the signals of a further increase from 2022! We emphasize that volume and imbalance fees should only cover the necessary costs related to dealing with the imbalance markets for Statnett and no more.

On behalf of Tafjord Kraftproduksjon AS, Istad Kraft, Troms Kraftproduksjon AS and Tussa Energi AS.

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