

B-DRA Position:

Bidladder

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Imbalance adjustment:

A symmetrical treatment of over- and underdelivery is preferred, as this is considered a more fair approach which guarantees a better level playing field. However, it is mentioned that this is not a breaking point.

Overdelivery should be managed via the product specification instead of the proposed imbalance method. Penalties and exclusion should be introduced for repeated unjustified overdelivery

Mutual exclusivity R3 versus BidLadder:

Bidladder and free bids products are designed to allow extra capacity that is still available after the “main market” to be offered to the TSO to increase liquidity and offer the possibility of extra remuneration to the asset manager. This is the case for cipu units offering free bids for the capacity that remains after DAM and should be equivalent for non-cipu units for which the main market is R3 and the remaining capacity should be allowed to bid in the bidladder.

If that is not the case as proposed today by Elia then:

1. This is discriminating for non-cipu units versus cipu units
2. This will significantly reduce the liquidity in the bidladder to the point where there could be very little volume offered as most if not all of the available delivery points will be contracted in an R3 product

There would be no free bids if the cipu assets had to choose between DAM and free bids!

The current design is unacceptable for aggregators of non-cipu assets.

Kind Regards
