

Status on:

Strike/Reference price

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Status: Strike & Reference price

- Remember: There were 4 options on the # of Strike price(s) and % of hedging exemption upon which a "survey" was organized
 - → Option 1: One single Strike price formula & No payback obligations exemption
 - → Option 2: Multiple Strike prices formulas & No payback obligations exemption
 - → Option 3: One single Strike price formula & Fix % payback obligations exemption
 - → Option 4: Multiple Strike prices formulas & Linked % of payback obligations exemption
- Arguments were received from several stakeholders focusing on a set of assessment criteria, underlying the multi-objective nature of the design question:
 - ✓ Simplicity/complexity & feasibility
 - ✓ RO Principle (spirit of the law)

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- ✓ Technology Neutrality and Openness
- ✓ Limit Overall CRM cost & Avoid Windfall profits

> The survey has not yet resulted in a clear consensus or silver bullet alternative

> Over summer the topic has been further discussed within the Comité de Suivi



Forward hedging exemption?

An exemption on the payback obligation linked to forward hedging is no longer considered in the updated proposal

Justification:

- Academic literature is inconclusive on the so-called "Forward backwardation principle" and its applicability to our context.
- As such, **hedging in forward markets is an individual choice** (per asset and/or company) linked to a trading and risk management strategy.
- A market-wide exemption on the payback obligation would ignore the individual choice element, whereas an individualized approach risks to interfere with energy market functioning and more generally increase overall mechanism complexity (either via a lock-in in case of multi-year contract and/or increased complexity)

→ To the extent CRM participants at individual level would appreciate a risk related to forward hedged volumes, they can of course assess this risk when pricing their offers in the CRM

> Only design options 1 and 2 remain: one or multiple strike prices?



One or multiple strike prices: Elia proposal (1/3)

To best meet the multiple objectives for the strike price design, it is proposed to foresee:

A single, sufficiently high strike price complemented with (1) a payback exemption in case of unplanned and planned unavailability, (2) load following factor and (3) a separate stop-loss limit on the payback obligation

> Single strike price

- Ensures a level playing field in the CRM via a homogeneous product
- Facilitates DSR and small-scale generation participation as it avoids technology-driven limitations to aggregation in case of 2 or more technology-driven strike prices
 - Otherwise, how to fairly aggregate generation, storage and demand response which have de facto very heterogeneous activation costs
 - If technology-differentiation would be considered appropriate, this would actually require several strike prices, i.e. at (sub)technology level, which would be very impacting and very complex
 - Moreover, by differentiating technologies explicitly via "the economics", it would not be sufficient to limit this to the strike price to ensure a non-discrimination. Also in the capacity auction further differentiation would be required, e.g. through technologydifferentiated price caps recognizing the differences between CAPEX/OPEX of various technologies.
- o Limits complexity/risk of intransparency towards energy market functioning
- In line with earlier EC approved mechanisms in Ireland and Italy



One or multiple strike prices: Elia proposal (2/3)

To best meet the multiple objectives for the strike price design, it is proposed to foresee:

A single, sufficiently high strike price complemented with (1) a payback exemption in case of unplanned and planned unavailability, (2) load following factor and (3) a separate stop-loss limit on the payback obligation

- > Sufficiently high strike price
 - The strike price should be sufficiently high to ensure a realistic chance of all technologies to participate in the CRM. This is particularly relevant with respect to high SRMC technologies, not the least for demand response
 - The strike price should however not be excessive in order to
 - Respect the spirit of the CRM law, i.e. ensuring a reliability option with a payback obligation
 - Limit any windfall profits of lower SRMC-technologies, to the extent not all inframarginal rents from the energy market are not accounted for in setting the CRM offer prices
- > Towards a first, preliminary calibration: a strike price range of [500;800] €/MWh seems an acceptable trade-off
 - International comparison:
 - Irish strike price: 500 €/MWh (already DSR-driven)
 - Italian strike price: 125 €/MWh (not DSR driven and generally different DSR approach)
 - Average activation cost of strategic reserve (SDR) for winter 2015-16: 736,73 €/MWh



One or multiple strike prices: Elia proposal (3/3)

To best meet the multiple objectives for the strike price design, it is proposed to foresee:

A single, sufficiently high strike price complemented with (1) a payback exemption in case of unplanned and planned unavailability, (2) load following factor and (3) a separate stop-loss limit on the payback obligation

> Payback exemption in case of unplanned and planned unavailability & Load following factor

Cf. earlier proposals.

- Payback only due in case the energy could actually have been delivered to the market
- In case of unavailability no energy could not be delivered, hence no energy revenues supposed to be earned that could be reimbursed
- Load following factor corrects for the fact that not all contracted CRM capacity (~peak demand) would be required to meet demand at moments of the reference price being higher than the strike price.
- Separate stop-loss limit on the payback obligation (NEW)
 - · Stop-loss limit at the (yearly) contractual value
 - Ensures that any technologies with SRMC still higher than the strike price can participate as the risk on the payback obligation is not open-ended.
 - Ensures a better transition to phase-out the CRM as it allows the CRM offer price to go to zero. Without stop-loss energy(-only) revenues would be unnecessarily capped preventing a phase-out of the CRM

