

Date: 11/01/2019

Subject: MPP answer to the consultation on the report assessing the progressive coordination and harmonisation of mechanisms and agreements for redispatching and countertrading

The MPP would like to thank the TSOs for providing this table gathering the different redispatching and countertrading practices in each country. Nevertheless, we would very much welcome a more detailed table providing the following information on top of what is already provided:

- Timeframe for the detection of a need of redispatching and/or countertrading
- Timeframe for the application (firm request from TSO) of redispatching and countertrading
- Procedure to identify available bids for redispatching and countertrading
- Detailed selection procedures to activate those bids, in particular full transparency on the definition of a merit order of the available remedial actions based (and the criteria used)
- Details on how the counterbalancing actions consequent to the redispatching of a specific unit are managed.
- Pricing applied to the market participants being activated through redispatching and countertrading (cost-based, cost-based plus, free price, pay-as-bid, pay-as-cleared...)
- Impact of redispatching and countertrading actions on the imbalance price, if any

Furthermore, the MPP considers that all TSOs should at least briefly justify/explain their design choices in terms of congestion management mechanisms, in particular on key parameters such as the intervention timeframe of the TSO (DA, ID, balancing...).

In addition, TSOs who are not using countertrading, or not systematically comparing it with redispatching, should also justify their choices.

In addition to the inherent value of transparency to improve the overall market functioning, such information would help market participants to understand the difficulties for TSOs to develop a coordinated RDCT methodology according the timeline set in the CACM regulation, and facilitate positive contributions by market parties to foster the development of an efficient congestion management framework at regional level.