**Summary of responses**

**Abbreviations:**

**NRAs** – Baltic national regulatory authorities;

**TSOs** – Baltic transmission system operators;

**ISP 15** – 15-minute imbalance settlement period;

**EB GL** - Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing;

**Derogation request** - Baltic TSOs Derogation request from Article 53 (1) of EB GL submitted to NRAs on 16 November 2020;

**BRPs** – balance responsible parties;

**NEMOs** – Nominated Electricity Market Operators;

**MTU** – market time unit;

**DSOs** – distribution system operators.

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| **No** | **NRAs request** | **TSOs response** |
| 1. | With regard to moving to 15 minutes time resolution NRAs ask information on the work carried out between the adoption of the EB GL and the submission of the Derogation request and the reasons, explanation for the failure to ensure 15 minutes time resolution by the end of 2020. | Explanation is given in Section I of the Derogation request. TSOs intention was to introduce ISP 15 in timeline defined in Article 53(1) of EB GL, but after evaluation of responses of market participants received after public consultation concluded, that implementation of ISP15 is not possible within the deadline included in Article 53(1) of EB GL. |
| 2. | In point 4) of this Section there is mentioned Baltic-Nordic balancing market cooperation. NRAs invite to provide detailed information about this cooperation and the reasons why not granting a derogation could reduce liquidity for the Baltic-Nordic balancing market | TSOs have re-evaluated arguments regarding liquidity for the Baltic-Nordic balancing market and have decided not to use it as an argument for Derogation request. An assessment of the consequences of requested derogation on adjacent markets is included in Section V of the Derogation request. |
| 3. | Section “BRP scheduling” of Table 1 sets, that 15 minutes along with 60-minute resolution (EE only) schedules are made according to national BRP terms and conditions. If the resolution time is not harmonized among Baltic states it could be discriminatory for some of the network users or shippers if there are no other reasons for TSOs proposal for different timeframes, NRAs invite TSOs to revise Table 1 and its explanation, indicate in the Concept Document a date when TSOs plan to present amended Terms and Conditions for NRAs’ approval (new milestone) or provide justified explanation why the resolution time cannot be harmonized. | Explanation was given in Table 2 ''Changes to the elements of the Baltic balancing setup and energy markets'' of Derogation request defining, that Estonian TSO would enable for BRPs to submit balance plans according to market product resolution (1h or 15min). Therefore, resolution time shall be considered as harmonized.  Information regarding amendments in Terms and Conditions has been included in Section IV of Derogation request. |
| 4. | In the section “aFRR Balancing market” NRAs invite to add additional explanation, how requirements as defined for European aFRR balancing energy platform are planned to be established earlier then resynchronization. | Identification of deadline regarding go-live for PICASSO platform was included in Table 1 "Roadmap for 15-minute ISP implementation'' of Derogation request.  It also should be noted, that all requirements for synchronization must be fulfilled before beginning of trial operation, that according to Agreement on the conditions of the future interconnection of power system of Baltic States and power system of continental Europe must be performed for one year before synchronization. |
| 5. | Article 53(1) of EB GL determines that, by three years after the entry into force of this Regulation, all TSOs shall apply the imbalance settlement period of 15 minutes in all scheduling areas while ensuring that all boundaries of market time unit shall coincide with boundaries of the imbalance settlement period. As the EB GL mentions all time units then this also means day-ahead market time units.  Now there is a workflow going on between TSOs and NRAs in European Union level to update the single day ahead coupling (SDAC) system, and timeframe for day-ahead market should be included in the Concept Document. | TSOs would like to explain, that Derogation request is narrowed only regarding requirements of Article 53(1) of EB GL defining an obligation to implement 15-minute ISP until 18 December 2020.  Since implementation of 15-minute market time unit in day ahead market can be done only in cooperation with NEMOs by supporting the initiative of NEMOs, TSOs cannot provide timeframe for 15-minute MTU implementation in day ahead market. |
| 6. | NRAs ask TSOs to supplement roadmap with more specific information and precise implementation deadlines of the actions related to 15 minutes ISP implementation. | TSOs have included detailed implementation roadmap in Table 1 of the Derogation request. |
| 7. | NRAs consider that changes in metering data resolution and allocation play a key role in the introduction of 15 minutes ISP and, therefore, request that detailed information on the changes related to Datahubs and 15 minutes metering as well as deadlines for the implementation of the changes be included. | Baltic TSOs provide following explanations:  *Implementation plan for Estonia:*  According to Estonian NRA questionnaire to network operators the plan for Estonia system about how to implement 15 min ISP would be as follows:  1. By 01.01.2025 the 15-minute readers shall be implemented for all metering points of the transmission network, all border metering points between network operators, all producers from 15 kW production capacity, large consumers and all measuring points with a connection of 200 A.  2. Since 01.01.2031 all metering points shall be replaced to 15-minute resolution.  3. Elering shall develop the DataHub developments to enable DSOs to submit either 15min or 1h resolution metering data.  4. The requirements for DSOs will be added to Electricity Market Grid Code.  *Implementation plan for Latvia:*  1. By target date of Milestone 1, the national data hub shall be capable to provide aggregated BRP data in 15-minute resolution and all relevant IT processes shall be established:  a. all metering data from TSO and all DSOs shall be submitted to the national data hub with 15 or 60-minute resolution (as individual meter point data or as aggregated data by trader) (if submitted with 60-minute resolution, the amount shall be divided in 4 periods each 15 minutes);  b. at least for the grid users with installed capacity above 5 MW metering data shall be submitted to the national data hub as individual meter point data in 15-minute resolution.  2. By target date of Milestone 2, metering data for at least 80% of amount of total consumption shall be submitted to the national data hub as individual meter point data in 15-minute resolution, if submitted with 60-minute resolution, the amount shall be divided in 4 periods each 15 minutes).  *Implementation plan for Lithuania:*  Implementation of Data Hub by 2023 also include the rollout of smart metering will ensure 15 minute resolution metering data functionality.  Metering resolution for transmission network user is planned to be implemented no later than by 2023 also considering the alignment with Milestone 1.  For the network user where smart metering will not be available reallocation is foreseen to be defined in national legislation. |
| 8. | In accordance with this sub-section of the Concept Document, 60 minutes time resolution could be applied in Latvia as in Estonia. Therefore, the sub-section should be supplemented with a description of how measurement data using 60 minutes resolution will be allocated to BRP portfolio ensuring 15 minutes resolution in Latvia. NRAs kindly asks to provide additional information with detailed justification or give additional explanation. | TSOs would like to explain, that, if measurement data are available only in 60-minute resolution, the amount shall be divided in 4 periods each 15-minutes and allocated to BRP portfolio accordingly. |