

21st Market European Stakeholder Committee (MESC)

Wednesday, 23 September 2020 from 10:30-16:00
Online Meeting

Draft Minutes

Participants		
Christophe	Gence-Creux	ACER/Chair
Athina	Tellidou	ACER
Mathieu	Fransen	ACER
Rafael	Muruais Garcia	ACER
Markela	Stamati	EC
Paula	Ceballo	EC
Julio	Quintela	CRE
Maarten	Klijn	ACM
Rickard	Nilsson	Europex
Edmund	Beavor	Europex
Hélène	Weil	EPEX SPOT
Michael	Van Bossuyt	IFIEC
Rafael	Gomez Elvira	All NEMO Committee
Yannick	Phulphin	Eurelectric
Helene	Robaye	Eurelectric
Abi Afthab	Olikathodi	Eurelectric
Jerome	Le Page	EFET
Paul	Giesbertz	EFET
Sonia	Saly	EFET
Maria	Popova	EFET
Lorenzo	Biglia	EFET
Sven	Kaiser	E-Control
Blandine	Malvault	Windeurope
Naomi	Chevillard	Solarpower Europe
Andres	Pinto-Bello	Smarten
Petteri	Haveri	Geode
Tim	Schittekatte	FSR
Valerie	Reif	FSR
Chris	Wood	Elexon UK
Gilbert	Guntschnig	APG
Thierry	Lemoyne	Arkema
Zeynep	Ozmen	Epias
Javier	Barrantes	ENTSO-E/REE
Mario	Turcik	ENTSO-E/SEPS
Konrad	Purchala	ENTSO-E
Kristine	Marcina	ENTSO-E
Jean	Verseille	ENTSO-E/SIDC Chair
Kacprzak	Przemysław	ENTSO-E
Tore	Granli	ENTSO-E
Michele	Dion-Demael	ENTSO-E
Benjamin	Genet	ENTSO-E/CWE TSOs/Core TSOs
Zoltan	Gyulay	ENTSO-E

Participants		
Ricardo	Renedo Williams	ENTSO-E
Stela	Nenova	ENTSO-E
Marta	Mendoza	ENTSO-E
Gjorgji	Shemov	ENTSO-E
Miha	Pregl	ENTSO-E
Ole Jacob	Hoyland	ENTSO-E
Alexander	Dusolt	ENTSO-E

1 Opening

1.1. Welcoming address + Approval of minutes + Draft Agenda (Christophe Gence-Creux, ACER)

The Chair opens the meeting and informs that the comments received on the last MESC meeting minutes were accepted. The Minutes of the June 2020 MESC meeting are approved.

The following changes are proposed for the agenda

- Skip item 2 on Balancing as the Implementation projects for the European balancing platforms, MARI and PICASSO, held a workshop in July with high participation. ENTSO-E and ACER slides are available on the website. ACER will follow up and sound market participants about their appetite for an Electricity Balancing Stakeholder Group meeting.
- Item 3: add LT CCM for CORE region
- Skip item 5 on the Iberian price cap as NRAs/ACER are still waiting for feedback from new Commissioner from CNMC. An update will be given in the next MESC meeting.

1.2 Update on recent developments (recent decisions, appeals, Update on CCR) (Christophe Gence-Creux, ACER)

The Chair updates on recent developments:

- Appeals: Decisions on six European EBGL methodologies were made and a decision on cross zonal capacity allocation for the exchange of balancing capacity in the Nordics has been taken. ACER received six appeals on EBGL proposals in January and the BoA decided in July, dismissing them. The decision on the appeal on the definition of System Operation Regions is due in the coming weeks. Another appeal on the EBGL Implementation Framework for Imbalance Netting was received during summer. EFET (Jerome Le Page) questions how appeals submitted by market participants are dealt with as one appeal by market participants was denied.
→ The Chair will come back on the issue.
- CCR definition: after the the annulment of ACER's decision, ACER requested TSOs to submit a new proposal reflecting the two recent amendments on CCR definition and reflecting the existing situation. ENTSO-E (Zoltan Gyulay) explains that a public consultation was held, and the updated package should be submitted in course of October. TSOs are happy to resubmit, resolving the legal uncertainty though they don't support all recent amendments
- Eurelectric (Yannick Phulphin) in reference to the consultation on redispatch and countertrading suggests providing more feedback and reporting of cases on interactions or miscoordinations between CCRs. Eurelectric finds it challenging to change CCRs now, with coordination process on regional level and works that started some years ago and continue in forthcoming years. Nevertheless, there should be reporting on the extent to which critical elements with effective congestion are impacted by flows resulting from exchanges in different CCRs, which should be the main basis to define the CCRs. The Chair agrees with the need for more visibility on interactions between CCRs. ACER will do their best to provide this visibility through the market monitoring report. ENTSO-E (Zoltan Gyulay) explains that the CCR reassessment request comes from the request to coordinate between CCRs. At the heart is whether to reopen the CCR definition question or close legal uncertainty. The Chair notes that it will take time to redefine CCRs, but it should be possible to provide visibility on interaction between CCRs. This is also related to the fulfilment of the 70% rule.
- European Resouce Adequacy Assessment decision should be made by the end of the month.

EC (Paula Ceballo) updates on their developments:

- Procedural amendments on four Guidelines: Expect to be adopted in Electricity Cross Border Committee in the 2nd half of October.

- CACM amendments: Informal work has started for which input from several parties was received. There will be a meeting in November with NRAs, TSOs, NEMOs for MCO operational governance (MCO task definition, cost sharing, etc), hoping to get clear idea and text proposals. Also, smaller amendments could be done e.g. on intraday auctions. Formal step for CACM amendments won't begin before 2nd half of 2021. CACM will be the first Guideline to be amended. Priorities are on the implementation and enforcement of CACM methodologies. EFET (Jerome Le Page) reminds that actual implementation of certain methodologies is difficult because of certain incoherences in the Guidelines which should not be forgotten. They suggest starting informal discussion with the EU associations to move quickly when formal process started.
- Iberian price caps: waiting for information from the regulator. EC doesn't agree with interpretation as it is not in line with regulation.

2. Balancing

Item is skipped, material is available on the website.

3. Forward

Update on Firmness and remuneration cost sharing methodology

The Chair presents ACER's updates on firmness and remuneration of long-term transmission rights, on the Baltic long-term capacity calculation methodology and the long-term splitting for SEE region.

ENTSO-E (Konrad Purchala) understands that in the Baltic region no methodology would be in place for some time as the methodology can't be approved and ACER asked TSOs to resubmit. Regarding the firmness and remuneration cost sharing methodology, ENTSO-E highlights that this methodology is complex, linking different processes from long term and having implications for Day ahead in terms of congestion income and when including the LT results in the Day Ahead domain. It is unclear what happens in Day ahead and long term regarding the compensation/socialisation of income, especially on long term capacities which are not fully coordinated due to historical agreements. The Chair responds that they are aware of the interaction between the different timeframes; it seems ACER and NRAs are converging on the issue. Regarding the Baltics, it is completely new, that ACER rejects a proposal by TSOs, however they consider to not have the full information for this decision. Additionally, the methodology submitted depends on a confidential agreement with a 3rd party which is required for secure operation and can't be amended overnight. Expectation that the status quo will prevail until the synchronisation with Continental Europe.

CORE TSOs (Benjamin Genet) update on the long-term capacity calculation methodology.

Eurelectric (Helene Robaye) would appreciate more clarity in the methodology on when the minRAM approach is applied. They are surprised about the 5% threshold for the CNEC selection as this differs from Day Ahead. They find the flow based approach interesting as concept, to allow the market to get the best NTC extraction per border but they were thinking whether capacity calculation is sufficiently mature and transparent before going to a more sophisticated approach, especially questions on splitting remain. Eurelectric (Yannick Phulphin) appreciates to see innovation. On flow based, it seems different than in Day ahead as in Day ahead it is based on net position in a bidding zone, and here it is going to be a value for each border and each direction. This seems a challenge. Furthermore, a lot will depend on the 24 situations that are considered for the capacity calculation. They request TSOs to detail what level of risk TSOs will consider for balancing the risk and more capacity for the market.

EFET (Jerome Le Page) agrees with Eurelectric and would like to understand better what exactly the 24 grid models shall represent. They assume it is common grid models and wonder how they will be developed. In their view, the risk is that domains are very limited.

The CORE TSOs (Benjamin Genet) confirm that the minRAM and CNEC selection approach is slightly different than in Day ahead, as this is all new for capacity calculation in long term. TSOs propose to start with some flexibility to test and fine tune along the way. There are many things to be done to develop such methodology, many open challenges, for which especially good data will be needed. TSOs proposed to tackle challenges with market parties, by organising a kind of parallel run. The intention is to share results of the capacity calculation methodology. Flow based in long term is different from Day ahead as in Day ahead net positions are calculated and in the long-term capacities, furthermore, there is no certainty that flows will materialise in the long term allocation. Can't take into account relieving effect, only burdening effect can be considered. PTDF negative data will be put to zero. Consultation was launched on 16 September, the link is available on the slides.

4.1 Update on XBID/SIDC (Jean Versailles, SIDC Chair)

The SIDC (Jean Versailles) updates on XBID/SIDC. The Chair notes that SIDC will be completed on all EU borders by end 2021

Eurelectric (Yannick Phulphin) questions on the work for integrating auctions in XBID and whether only available capacities or also bids need to be transmitted from one platform to the other. The SIDC Chair clarifies that it is mainly about capacities, but also the results of auctions are needed to derive the available capacity after the auctions. Also, the post coupling processes related to auctions need to be considered among which the results need to be validated by TSOs and transferred to XBID for continuous trading. Eurelectric (Yannick Phulphin) wonders whether there is any progress on having flow based on XBID. The SIDC Chair confirms that this is not on the agenda for the moment, but considered under R&D. They expect to launch a first impact assessment how flow based could be integrated early next year. This also depends on the capacity calculation methodology for intraday. Eurelectric reminds that for the CORE region it is supposed to be flow based. The SIDC Chair explains that there are many big developments, such as ID auctions, flow based, losses, cross product matching on which they will start working. They explain that there is no timeline yet for cross product matching.

4.2 EFET position paper for an improved market design in intraday (Jerome Le Page, EFET)

EFET (Jerome Le Page) presents EFET's recommendations on the Intraday market design

The SIDC Chair explains that automatic adjustments on technical price limits are not deemed necessary. Internal adjustment process (when prices reach 60% of max price (3000EUR/MWh)), otherwise no technical limitation up to 9999EUR/MWh, but it can be changed in the IT system without problems. EFET (Jerome Le Page) notes that limits were not reached in intraday. They believe automatic adjustment mechanisms would be needed for intraday and day ahead, for EC/ACER to assess. The Chair confirms that their position has not changed, ie that they would be open to revise the decision when NEMOs propose or all NRAs request all NEMOs to submit new version. EC (Paula Ceballo) understands that it's not the real problem impeding correct price formation in the market.

ENTSO-E (Konrad Purchala) responds that some of the recommendations are more or less agreed, such as products for intraday, 15min resolution and the Imbalance Settlement Period harmonisation to 15mins. TSOs work with NEMOs and market participants. Need to set up plan how to enable all these evolvments across Europe. It will take significant time, as products touch on intraday, day ahead and balancing markets. Same for capacity calculation and allocation foreseen by regional methodologies, which are either approved, discussed or implemented. Other items, e.g. moving GCT close to real time are more challenging.

GEODE (Petteri Haveri) agrees with EFET and recommends TSOs to rely on the market as it makes their lives easier. Closer GCT should help balancing the system. Nordpool has already a GCT at 0 in Finland. Also, it should be possible to share order books as of 15:00. They find it somewhat frustrating, that the project focuses on how to consider losses or maximise congestion income rather than market functioning and ask to swiftly move forward with EFET recommendations. The Chair confirms that sharing of order books is looked into. It is not explicitly mentioned in the decision, but ACER expected that all NEMOs share order book as of 15:00. This has not been properly implemented. Consider further actions in the coming weeks. The SIDC Chair clarifies that for the sharing of order books after the GCT it is up to NRAs/EC to amend regulation.

EFET (Jerome Le Page) asks ACER on next steps regarding cross zonal GOT. The Chair notes that maybe it was not explicit but for sure expected. Will finalise review of implementation status, to which extend order books are shared from 15:00 onwards. Once the review is completed, they will liaise with concerned NRAs and their feedback on the situation, why not implemented as expected.

→ ACER to report back in next MESC

4.6 Update from NEMO Committee (Rafael Gomez Elvira, NEMO Committee)

Rafael Gomez Elvira introduces himself as new Chair of the NEMO Committee and presents the update from the NEMO Committee.

Eurelectric (Yannick Phulphin) notes that it is difficult from market parties' perspective to take any learnings from cost reports. It is more interesting to discuss regularly the ongoing work on future developments and what budget and timelines are allocated for R&D, e.g. discussed under XBID (flow based, cross product matching etc.). The NEMO Committee Chair highlights the detail of information submitted to NRAs and informs that they are implementing the current regulation with different challenges, e.g. 15mins. They note the request and will keep market participants informed about their plans.

4.6. Update on Core FB and DE-AT-PL-4M MC Projects (Ole Jacob Hoyland, Miha Pregl, SDAC)

Ole introduces himself and Miha Pregl as new SDAC Co-Chairs and presents the update from the SDAC project

The SDAC project presents the roadmap for extension of the Market coupling.

As a consequence of Brexit, the bidding zones GB 1 and GB 2 and all lines connected to these will be removed from the SDAC market coupling and SEM bidding zone (Ireland) will operate in isolated mode.

The go-live date of the interim coupling project is under reassessment. Written guidance of the EC on the continuation of the project is expected by the end of September. EC is expected to follow a pragmatic solution. Stakeholders want to have visibility on the dates and next steps. The chairman of the Interim coupling project (Mario Turcik, CEPs) explains that they had initiated the activities to deliver a detailed planning that may allow for go live in April. There is no competition between the Interim project and the CORE flow based project.

Regarding the status of the Nordic flow based implementation, DA and ID capacity calculation methodologies are being implemented at the Nordic RSC. The external parallel run is delayed at least to April 2021 to ensure data quality and the needed IT developments. Nordic stakeholders express their concerns on the current process. The SDAC Chair will take forward the concerns to the Nordic FB convenor.

CORE Flow based MC Go-Live window is currently between May and September 2021. One more CORE Consultative Group meeting is foreseen on 7th October 2020. Further details will be provided in the CORE consultative group.

A training session on a full decoupling will take place on 30 September 2020 from 13:00-17:00 for market parties. Further information will be provided to the Market parties after this meeting. Besides this training, SDAC has established a joint expert group that is looking into each process before 15:30 CET for improvements. Expectation is to present the outcome of the investigation in the MESC meeting in December.

Regarding 15 minutes MTU implementation, the NRAs had provided the guidance to follow a stepwise design. This means that there will be derogations across Europe until 2025, so multiple MTU (15min/30min /60min) within SDAC may exist in the interim phase. The implementation of 15 min MTU in DA is expected by 2024 at the earliest. The work has already started within SDAC project.

4.3 ACER's upcoming study on barriers to efficient price formation and to new market entrants (Rafael Muruais Garcia, ACER)

ACER (Rafael Muruais Garcia) informs about the upcoming study and explains that the study specifically refers to electricity. A similar study was conducted on the gas side.

Eurelectric (Yannick Phulphin) notes that some members were surprised by this initiative as they did not see in CEP where ACER is mandated to assess these dimensions. ACER explains that the basis is Art. 15 of the ACER regulation 2019/942 within the scope of the market monitoring report. Eurelectric suggests looking into efficient price formation, e.g. when prices get close to zero or negative with low demand and high feed in from subsidized generation.

4.4 Update on the BZ review (Rafael Muruais Garcia, ACER)

ACER (Rafael Muruais Garcia) presents the process.

Eurelectric (Yannick Phulphin) notes that the LMP simulation looks like a huge task and depends a lot on the level of complexity in the model used, and asks whether this will be done on past data or on forward looking situations.

Europex (Rickard Nilsson) notes that LMP calculation is indeed quite complex, could instead calculate merger of bidding zones. It is a daunting task to have pan EU simulation with complex network elements and market bids.

EFET (Paul Giesbertz) identified fundamental flaws in the methodology. EFET did not get feedback on their comments and suggests organising a bilateral meeting.

ACER states that they can either focus on historical data, with historical congestion and including projects coming in the next three years. After discussing with TSOs, a future time horizon is envisaged with the coming three years after the start of the bidding zone review. They acknowledge the challenging complexity. It is acknowledged by TSOs that consultations have to be done for whole Europe but accepted that the modelling will be done in regions, simplifying the rest of the network, e.g. Nordic would do a separate calculation.

Eurelectric notes the regional focus and asks which regions are foreseen, whether there are additional requirements on short term markets and redispatching and whether expenses for redispatch is handled as loss or redistribution.

EFET finds that there should be an overall view on all criteria to measure effect on bidding zones and suggest to not exclude any scenarios in the first step with the quantifiable criteria. The requirement is to somehow quantify all criteria and have overall assessment of all criteria. Furthermore, they have a fundamental concern on the quality of the methodology on short term and redispatch costs. Finally, they wonder why the method will be decided in November and the configurations one year later and suggest that more time could be used for developing the methodology.

ACER clarifies that no scenario will be dismissed in the first step. The aim is to have a tool to address congestions, with emphasis on all aspects to manage congestions. The bidding zone review should not be a tool for any issue in the market. Thus, all criteria are relevant and have to be addressed. Remaining challenge to combine quantifiable and non-quantifiable criteria. Emphasis on monetarised parameters. They suggest regions as also developed by TSOs: Southwest, Central Europe/CORE, SEE, Nordic, Italy/Greece. Welfare changes will be sum of two dispatches, Day ahead and redispatch together.

Eurelectric (Yannick Phulphin) notes that ENTSO-E consulted last year on regional approach. There are lots of challenges and questions on how those regions have been chosen. They find it frustrating that the regional constellation and its criteria are not discussed. A change in one region can have an impact on the others. ACER responds that these regions were acceptable for many, after discussing pros and cons. This seems to be the best balance to avoid the risk of blocking the process through regional issues in a pan EU review.

EFET (Paul Giesbertz) suggests merging step 1 and step 2 in slide 10 and suggests using the one year to improve the methodology. ACER explains that it is required by regulation to decide on the methodology this year. Many provisions in method will be aligned with exercise for TSOs on LMP. Tasks are very similar, e.g. on data collection. If they are decoupled, there is a risk that LMP calculation and method go in different directions.

ENTSO-E (Konrad Purchala) highlights that the bidding zone review needs close and effective cooperation between TSOs executing the study and NRAs and ACER, dictating the requirements and specifications. There is a need to strike a balance on what would be perfect and what is workable, adding biggest added value, building on TSOs', NRAs' and stakeholders' experience. Some requirements sound right and make sense but can be difficult to realise in practice.

The Chair concludes that there are some more weeks to refine the methodology, where ACER will continue discussing with NRAs and TSOs.

4.3 Update on the RDCT for Core and SEE (Christophe Gence-Creux, ACER)

The Chair informs that two regions referred proposal to ACER. Target for decision is end September. Will have small delay, due to complexity on several elements.

Eurelectric (Yannick Phulphin) states they find cost sharing important but have no specific opinion, overall efficiency is more important. Having efficient redispatching and countertrading is key to get close or above 70%. They ask, when we could expect regionally coordinated remedial action activations. The Chair informs that the timeline foresees late 2023, early 2024. CORE TSOs (Benjamin Genet) adds that the TSO proposal included a timeline of 4.5 years for the implementation, which seems acceptable for ACER and NRAs, acknowledging the complexity and novelty of the process. As there was a strong wish to have interim developments, it is discussed to have something 2.5 years after the decision. Intermediate step should enable the 70% as main goal. ENTSO-E (Konrad Purchala) informs that TSOs are surprised by the latest wording of the cost sharing methodology. Previously it contained a polluter pays principle and now it mixes owner and polluter pays principle. TSOs are hoping for constructive discussion to get adequate methodology based on the polluter pays principle.

EFET (Jerome Le Page) notes that we keep on talking about cost sharing, less about redispatch and countertrading. Because of that there is still no coordination of redispatch and countertrading. Would like to see moving ahead. The Chair highlights that until cost sharing is agreed TSOs are unlikely to use coordinated redispatch. It will take weeks/months to finalise this decision. There are significant costs at stake and ACER expects an appeal on the decision. CORE TSOs (Benjamin Genet) notes that the current text is difficult to interpret. If a study about legitimate level of loop flows is requested, clarity on what is requested has to be provided.

Furthermore, ENTSO-E notes regarding the other redispatching-related methodologies (ie the ROSC methodology) under consultation by the Agency, every TSO needs to indicate costs for generators to optimise coordinated redispatch. It looks like deviation between indicated and real costs are borne by TSOs responsible for remedial measures. Could discuss about how long a generator is liable to maintain their offer. Changing market positions will make real costs different from indicated costs, this should be considered when finalising the methodology. The Chair confirms that this is part of the ongoing discussion.

On the ROSC methodology, EFET (Jerome Le Page) notes that there is a question related to lack of harmonisation of redispatch procedures, whether they are market based or some form of cost based. There was never a proper discussion how we see congestion management should be performed.

Eurelectric (Yannick Phulphin) is surprised about the statement that a bid could not be changed until close to real time regarding firmness of bids for redispatch or countertrading. By that, corresponding plants would be taken out of intraday and loose opportunities for assets. For them, a redispatch bid is like intraday, it is firm when it is activated. As long as a bid is not activated it must be able to be revised for outages or opportunities in the market.

4.5 Update on derogation requests (+ reasons for derogation) (Marta Mendoza, ENTSO-E)

ENTSO-E (Marta Mendoza) updates on derogation requests.

EFET (Paul Giesbertz) reiterates that on the reason for maintaining operational security, in theory cross zonal remedial actions could also be applied instead of restricting cross zonal trade to maintain operational security. It is not obvious that this is a reason for derogation and the efficiency of doing cross zonal remedial actions. Would be good if transparent justifications are made on derogations. They mentioned also the DE/DK case in the last meeting and ask whether EC followed the request to make this case more transparent. ENTSO-E confirms to ensure that every derogation is justified and approved by NRAs. In most cases there is a lack of available remedial actions. CORE TSOs (Benjamin Genet) agree that the issue could be solved by coordinated redispatch, but the high-level methodology is still discussed. In the meantime, operational security has to be ensured, therefore many TSOs go for derogation. Many TSOs mention the lack of coordinated capacity calculation, which is not in place in all regions.

EFET (Jerome Le Page) notes that one year after eif of this obligation there is only limited decrease on number of derogations. NRAs informed in the last meeting that they exercise scrutiny on derogation requests. Would like to make sure that sufficient effort is made, also on reason 3, lack of monitoring and tools, that there is actually progress.

The Chair reminds that NRAs haven't taken decisions yet

→ NRAs to update in next MESC meeting

FSR (Tim Schittekatte) asks what operational security reason means? In case of complying to the 70% rule would there be not enough remedial actions in that Bidding Zone or is it more complicated? ENTSO-E clarifies that justifications are public in most cases and reasons are more complicated.

→ The Chair to inform about more transparency on the DE/DK case.

5. Update on on the Iberian price cap (Article 10 Reg 2019/943)

Item skipped

6. Update on the harmonisation of rules for suspension of market activities (Kacprzak Przemyslaw, ENTSO-E)

ENTSO-E (Kacprzak Przemyslaw) presents on the harmonisation of rules for suspension of market activities.

EFET (Paul Giesbertz) reminds that market suspension is discussed for three years now. EFET produced a note, saying that in case of emergency, market activities are normally supporting the system security and that any suspension needs to be justified. One year ago, it was discussed again in MESC and plans were presented. EFET requested to include the question whether there is justification for market suspension in emergency in the survey, which seems not included. They will reiterate their concerns, no interaction, harmonisation report may not be sufficient. In real emergency, several member states will be affected, the idea that one country suspends the market and the others not, is not convincing. Request ACER to have critical look. First report should not be a benchmark for future reports.

Europex (Rickard Nilsson) agrees that markets support security of the system. They also have a concern with justification and what benefits come from suspension. In case of a blackout there can't be any market activities, but there could be instances where something happened now for the next hours with little impact for tomorrow. As markets are setup today, Day ahead, intraday, balancing, it is important to understand the consequences of a decision by one country to suspend markets and measure the pros and cons. It will affect other countries but also have consequence for market parties and their economic positions in the market. Exchanges involved as well. Typical example is, if there is a blackout in subset of EU system. Will that have impact for tomorrow? Will they restore the system, but (not?) facilitate trading for tomorrow? If they can't trade for tomorrow it will harm the system security, as TSOs will sit in a black box. It's positive that a workshop was done but Europex would like more interaction on EU level.

ENTSO-E underlines that there are important reasons for suspending markets, e.g. imbalance price areas are equal to bidding zones. In case of system split, it doesn't allow to have correct signal on system imbalance.

The Chair expects to receive the report in November and raises the idea of an ACER opinion as a good way forward to streamline the dialogue.

6. AoB

Eurelectric (Yannick Phulphin) thanks for the feedback on CGM questions in the SO ESC. They noted that Day ahead capacity calculation would be based on the EU CGM in most CCRs by the end of 2023 and are satisfied with it.

7. Meeting for 2020

Next meeting will be on 8 December online.