

Dear Nordic TSOs and NEMOs,

## Call for shortening of the so-called "grace period" for publishing results of parallel runs

As You are well aware of, the Nordic CCR is in the process of implementing a flow-based capacity calculation methodology in accordance with Article 20 of Commission regulation of 24 July 2015 establishing a guideline on capacity allocation and congestion management (CACM GL). The recently amended regional methodology was approved jointly by CCR Nordic NRAs in October 2020.

The choice and implementation of the capacity calculation methodology are regulated in the CACM regulation, primarily articles 20-21. Article 20(8) of the CACM regulation requires that market participants are provided with an opportunity to adapt to changes in the capacity calculation methodology by testing it in parallel with the existing capacity calculation methodology.

The Nordic NRAs have understood that the parallel runs of the Nordic flow-based capacity calculation methodology will be performed using a dedicated tool called Simulation Facility (hereinafter 'SF'). From our discussions with the Nordic TSOs, the Nordic NRAs have also learnt that by default (according to the Single Day-Ahead Coupling Operations Agreement, the DAOA) the historic input data from production is going to be available in the SF with two weeks delay after the production trading date. However, the Nordic NRAs are of the firm opinion that this delay should be kept as short as possible to facilitate the learning opportunity that the regulation foresees for market participants during the parallel runs. This view was also heavily supported by stakeholders' responses provided in the NordREG consultation regarding the parallel run arrangements of the Nordic flow-based capacity calculation methodology in the spring of 2020.

Based on this and with reference to the Single Day-Ahead Coupling Operations Agreement ("DAOA"), the Nordic NRAs are requesting that the historic data from production will be available for the parallel runs with as short delay as possible. Thus, we call for NEMOs and TSOs to look for solutions to shorten the time to an absolute minimum, since any delay will have significant negative impact on market participants' ability to examine and learn about the differences between the current and the future methodology.

We look forward to your constructive response by 3<sup>rd</sup> June 2021. We are convinced that you will heed this request for the continued benefit of the common market and its' participants. Should you have any immediate questions or comments regarding this topic, we will of course remain at your disposal.

Kind regards on behalf of NordREG,

Ove Flataker,

Chair of NordREG Board 2021