



Long Term Flow Based Auction: actions to take before go-live to ensure a smooth transition

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LTFBA will lead to borders with low volumes/no LTTRs allocated

- Allocating LTTR with Flow Based auction implies a competition between borders based on the bid price.
- This is due to the choice to maximize auction surplus, whether or not this increases social welfare (design choice – not a "fatality")
- This competition implies that some borders get low/zero LTTRs
 - ✓ If a border has a low spread at the moment of the auction, it will get low/zero volumes allocated, unless market participant bid way higher than the market price
 - ✓ This ignores the main risk MPs hedge with crosszonal capacity: the risk of spread volatility

How can this negative impact be mitigated ?

- Option 1: modify the optimization function
 → competing based on the extrinsic value/time value
- Option 2: ensure a minimum volume to be allocated at each border
 - \rightarrow "insurance" that no border gets isolated

Technical solutions exist and can be implemented

We urge TSOs and ACER to consider a mitigation measure prior to the go live

LTFBA will lead to an important increase in collateral requirements

Competition between borders leads to low/zero capacity at some borders

Significant increase in collateral ~ requirements

Long-term FB **lacks fundamental information** to enable efficient allocation HAR under consultation by ENTSO-E does not seem to address the issue:

It caps collateral, but the requirement remains high

- The forward spreads should be used for setting the cap (rather than DA spreads)
- The payment periods can be rearranged to ensure that the collateral is released

Still this system might trigger sub-optimal bid filtering

 The constraint should be integrated into the optimisation algorithm – selecting the best/optimal combination of bids