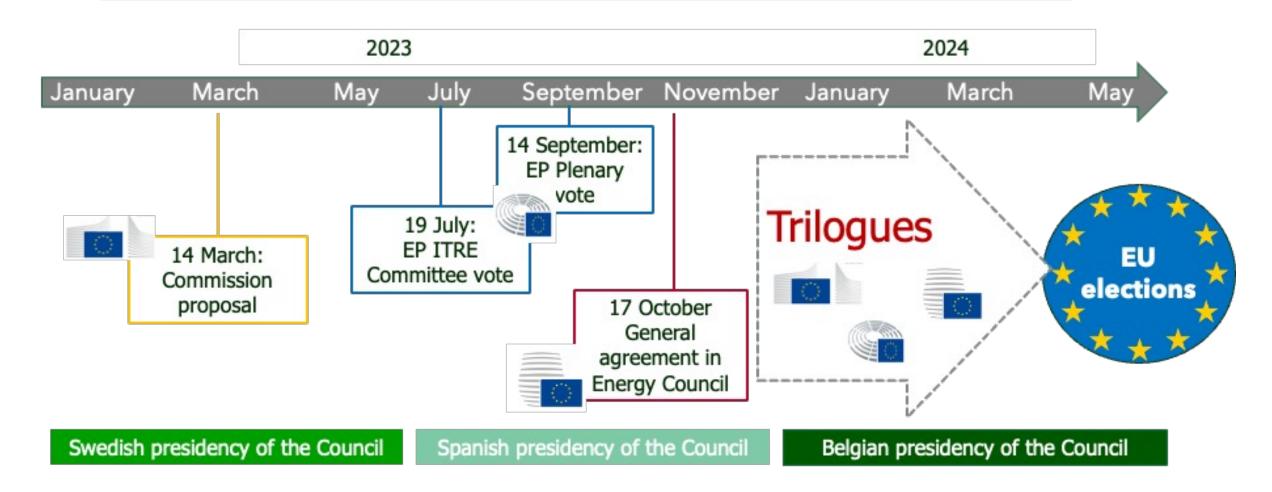




Reform delays create political uncertainty



The 2023 deadline will likely be missed Let's double effort to ensure the reform is enacted in Q1 2024



We're almost there on the declaration of energy crisis & emergency measures (66a Dir)

1 overarching principle agreed by all:

No emergency measures without an energy crisis declaration

2 principles on which the Parliament and Commission should stand firm:

EC should remain in charge of the crisis declaration

No prolongation of existing emergency measures

Details to refine by all:

Energy crisis trigger criteria to detail further



Some efforts still needed on the impact assessment for regional virtual hubs (9 Reg)

The current compromise foresees:

An assessment of regional virtual trading hubs (alongside LTTR allocation frequency, maturity, nature, and trading on a secondary market)

(9 months)

If regional VTH CBA is positive:
reform FCA GL to implement zone-to-hub LTTRs

If regional VTH CBA is negative:
no zone-to-hub
LTTRs

The impact assessment needs <u>18 months</u> to be substantial and quantified, not a recycling of previous theoretical studies



Quite a lot of work remains to maintain the integrity of spot markets (7.2_(ca) Reg)

Art.7.2(ca) Reg should not open the door to mandatory unit-by-unit bidding

Almost all EU Member States allow portfolio bidding Portfolio bidding allowed (DA/ID) Mandatory unit bidding (DA/ID) Portfolio bidding restricted - mandatory unit bidding in some



cases (DA/ID)

Trend over recent years:

moving towards more portfolio bidding

(Italy and Greece have moved from a general unit bidding obligation to allowing partial portfolio bidding)

https://efet.org//files/documents/EFET_Memo_PortfolioBidding_06102023.pdf

How portfolio bidding optimises electricity markets:



Demand matching at least cost



Quick adaptation to unforeseen changes



Better use of RES-E and flexible technologies



Same high level of transparency