

CONSULTATION RESPONSE



Energy Traders Europe response to ARERA consultation on virtual import service

Brussels, 13 September 2024

Q1. Do you share the Authority's guidelines? Do you think it is reasonable to allow the virtual import service to be structured on a quarterly basis?

We agree with ARERA's proposal to enable each selected party to choose between the annual or quarterly activation of the service as it would provide more flexibility.

To ease the bureaucracy, **market participants registered for the yearly auction should be allowed to bid also in the quarterly auctions** without going through the auction registration process again.

Q2. Do you share the Authority's guidelines regarding maintaining the German market within the selectable markets pursuant to resolution 179/09?

We support ARERA's proposal, however **interconnector rights quantities should be expressed with only 1 decimal number.**

In fact, there is an inconsistency between the amount of interconnector rights (reported by Terna as MW with 3 decimal numbers) and the offer that the shipper can submit in the energy markets in Germany and other eligible markets (MWh with only 1 decimal).

This misalignment determines difficulties for the shipper (or his delegate) to deliver the expected amount of energy in the "import" market according to virtual import obligation. There is a risk for market participant to incur into imbalances with consequent penalties or - in the worst case scenario - a suspension from the market.

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