

Response to the CCR Nordic TSOs' proposal for the 6 months' testing period of the Intraday Flow-Based Capacity Calculation Methodology

Brussels, 06 June 2025

Detailed comments

We agree that market participants should be given sufficient time to be involved and test a new capacity calculation methodology. We agree with a minimum 6 months and implementation as soon as possible. We encourage clarity and transparency in the Nordic TSOs processes and timeline, with enough lead time for market participants to analyse and integrate potential changes.

We recommend that the design of the Intraday Flow Based testing process closely mirrors the structure of the Day-Ahead (DA) FB testing period. Specifically, we suggest starting with a kick-off webinar outlining the process, followed by regular update webinars—every two to four weeks—where the TSOs present observations from the market, compare the current model with the FB Intraday model, and provide an opportunity for participants to ask questions or share comments. The transparency during the DA testing period was sufficient, and we encourage the same level of communication for the Intraday process.

One important aspect to be considered is how XBID is affected by the FB Intraday Allocations (FB IDAs) during the testing period. This would help avoid repeating the issues experienced during the DA FB testing period, where the impact of Critical Network Elements and Contingencies (CNECs) on flows in Sweden was not adequately assessed. This omission was widely criticized both during and after the testing phase.

CONSULTATION RESPONSE



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