

Terna consultation on MSD MARI coordination

Brussels, 15 July 2025

Key messages

1. The decision on the MARI go-live date should carefully balance the objective of timely implementation of the EU balancing target model - alongside its market integration benefits - with the need to ensure that both TSOs and market participants are sufficiently prepared for a smooth and effective start
2. The amendments to Section 9 of Attachment A.23, concerning the procedures for program updates in the event of accepted mFRR quantities, require further in-depth analysis. Attachment A.25 — which also governs the updating of generation profiles in the context of the transition between contiguous ISP - should also be taken into consideration
3. We encourage the organization of another technical webinar and the publication of FAQs to clarify outstanding technical and operational issues. We also stress the need for a well-structured and extensive dry-run testing phase that reflects a wide range of generation profiles

Annex A.23 comments

Elastic demand		
Annex A.23	Paragraph 5	Page 37
Comment	We note the importance of providing more transparency towards market participants on the utilization by Terna of elastic demand and determination of prices and volumes within the MARI platform	
Proposal	Publish the breakdown of the elastic and inelastic demand at least for each imbalance settlement period and explain the methodology	

Standard mFRR Product Definition		
Annex A.23	Paragraph 6.2	Page 40

CONSULTATION RESPONSE

Comment	Terna requests feedback on the possibility of sending mFRR activation orders up to 6.5 minutes before ISP start in exceptional infrastructure degradation conditions. We highlight that these conditions are undefined, making objective assessment impossible.
Proposal	Terna should retain the standard mFRR timings (Q-8 and 2.5 min prep), consistently with European timing requirements. Terna should resort exclusively to MB in exceptional cases - as already foreseen in cases of IT system failures (Chapter 4, §4.8.4.4.2) - where those timings cannot be met

Linking Logic Between Bids		
Annex A.23	Paragraph 6.5.1	Page 49
Comment	The Grid Code references "functional linking" to prevent overlapping activations in scheduled and direct auctions. However, the webinar presentation refers instead to a "technical linking" between contiguous ISPs.	
Proposal	Expand §6.5.1 to detail when and how Terna applies linking, and clarify operator responsibilities in managing overlapping ramp-ups and ramp-downs in contiguous ISPs.	

Exclusion of Non-compatible Offers		
Annex A.23	Paragraph 6.3.4 and 6.3.9	Page 42, 43, 45
Comment	We agree with excluding UAS/UVAN offers involving start-up, shutdown, or mode changes, since their timelines are not compatible – much longer - with mFRR standard product requirements.	
Proposal	n/a	

Energy-Constrained Units		
Annex A.23	Paragraph 6.3.7	Page 44

CONSULTATION RESPONSE

Comment	The principle of respecting daily energy limits for constrained units is sound. However, in practice, these constraints are not consistently applied in dispatch orders (OdD), requiring market participants to adjust schedules manually.
Proposal	Improve processes for enforcing energy limits and implement corrective procedures when dispatching orders are inconsistent with technical constraints.

Program Update Logic (No MB Orders)		
Annex A.23	Paragraph 9.2.1	Page 75-76
Comment	The update logic for Prif,bil (balancing reference program) upon mFRR activation without MB orders is oversimplified. Examples assume a flat profile and omit real-world variability and ramp constraints between ISPs (as described in Annex A.25). The lack of guidance risks misalignment between operator actions and system expectations, potentially resulting in imbalance penalties.	
Proposal	<ul style="list-style-type: none"> Significantly expand the program update methodology to include cases with variable Prif,bil and clarify if the ramping constraint (Annex A.25) should be applied before or after mFRR activation Suggest holding another technical webinar on this topic. 	

Program Update Logic (With MB Orders)		
Annex A.23	Paragraph	Page
Comment	As with §9.2.1, the update methodology lacks detail. Examples are again based on constant profiles and disregard ramping adjustments from Annex A.25, leaving uncertainty on how mFRR and MB activations should interact in program updates.	
Proposal	<ul style="list-style-type: none"> Expand the methodology to cover all practical cases, especially those involving both mFRR and MB orders. 	

CONSULTATION RESPONSE

	<ul style="list-style-type: none"> Recommend an additional technical webinar to address remaining uncertainties.
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Successive mFRR Activations		
Annex A.23	Paragraph 9.2.2	Page 77-82
Comment	If a "MAINTAIN DIFFERENCE" command overlaps with mFRR activation, Terna expects the market participants to maintain the delta power relative to the updated program. In order to introduce these provisions, technical adjustments are needed. Therefore, testing is needed to assess feasibility under various scenarios.	
Proposal	Include an extensive dry-run test phase simulating diverse generation profiles and overlapping command situations.	

Reliability of PV Communication		
Annex A.23	Paragraph 10.1.1, point	Page 88
Comment	Point d) states that Prif,bil is updated with accepted mFRR quantities at time TINI. However, in past experience (e.g. TERRE), the PV values received by operators did not always include all Terna-issued orders. With the transition to 15-minute ISPs, the risk and impact of this issue grow.	
Proposal	Ensure PV values communicated by Terna are binding and final, so market participants don't need to verify their reliability for each ISP.	

Annex A.34 comments

Balancing Order		
Annex A.23	Paragraph 1.3 and 2.3.2	Page 4-8

CONSULTATION RESPONSE

Comment	A.34 states that mFRR order would be classified as “CB” balancing orders. This generic classification could pose issues due to the possible confusion among different balancing orders.
Proposal	Introducing specific codification for mFRR in order to avoid confusion with other tipologies of orders.

Annex A.25 comments

Ramping limits		
Annex A.25	Paragraph	Page
Comment	The consulted updates do not refer to Annex A.25, but those provided might cause reaching the gradient saturation during the ramping phase	
Proposal	Terna should evaluate possible action to avoid such condition.	

Contact

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