

## Response to the proposed changes to Energinet's method for purchasing countrade energy

Brussels, 05 February 2026

### General comments

Countertrading, as one of the congestion management tools and ancillary services, has a value for TSOs and the operational functioning of the grid. Its interactions with trading timeframes lead to the need to clearly delineate the roles for TSOs in the markets, like intraday, as they are not market participants. We reiterate our position that TSOs act on the intraday market to perform countertrading; this activity should be clearly separated from other TSO activities and subject to the same rules and responsibilities as market participants. In particular, TSOs should stay under strict scrutiny of regulators based on REMIT for their activities on the Intraday market.

Concerning the consulted changes, we have no comment on broadening the definitions and categories for countertrading agreements. On the cost-sharing methods, we encourage them to consider EU-level discussions for a cost-sharing mechanism/methodology.

No comment on including the IDAs in the definition of the ID market, which reflects the new European reality. We are happy to see that a consultative process would be enacted if countertrading energy procurement would also include IDAs.

Concerning the extension of the trading period for fixed structural countertrade agreements, we reiterate our point about the TSOs' role in the market and the need for delineation, as well as being careful of impacts on the functioning of the ID market.

# CONSULTATION RESPONSE



No major comment about the earlier request time for countertrading needs, provided it does not disrupt the normal functioning of the ID market.

We welcome the consultation and explanations, continuing transparency on the process, and highlight the need for it, as well as non-discrimination in the procurement of countertrading energy.

## Contact

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