

Datum: 16.03.2009

D/DF  
BSW-Rej,-Rö,-Schd

TIWAG-  
Tiroler Wasserkraft AG  
Postfach 78  
A-6010 Innsbruck  
www.tiroler-wasserkraft.at



tiroler  
wasser  
kraft

Tiroler Wasserkraft - Energie mit Perspektiven

CEER Secretary General  
Mrs. Fay Geitona

**Ihr Ansprechpartner:** Dipl.-Ing. Michael Zoglauer  
Bereich Stromhandel und Energiewirtschaft  
Eduard-Wallnöfer-Platz 2  
A-6020 Innsbruck  
Telefon: +43 (0)50607 21503  
Fax: +43(0)50607 21788  
E-Mail: michael.zoglauer@tiwag.at  
Internet: www.tiroler-wasserkraft.at

**Fax** +32 2 788 73 50

**EREG Public Consultation:  
New GGP Balancing Markets Integration**

Dear Madams and Sirs,

we are pleased to take the opportunity to comment on the Draft Revised ERGEG Guidelines of Good Practice for Electricity Balancing Markets Integration (GGP-EBMI).

We are interested to develop the contribution to the European Balancing Markets by using the efficient available potentials of alpine hydropower. In this sense we welcome the initiative of ERGEG by promoting the European market integration also for Electricity Balancing Markets.

As mentioned in our contribution to the first consultation to GGP-EBMI the focus of our interest is the market access for balancing products. This can only be guaranteed by wise procedures of capacity allocation – as well for generation capacities by tendering procedures as for the respective transmission capacity. For this we like to stress the figure used by ETSO in the document “Key issues in Facilitating Cross-Border Trading of Tertiary Reserves and Energy Balancing” (May 2006) at page 37: it may lead to a value orientated dedication of transport capacities. It should be possible to optimise the benefit by a respective organisation of the contracting process of TSOs (e.g. by an balancing auction office for a market region).

The establishment of balancing auction offices - each responsible for one market region – should be the target and may be defined as “regional balancing function”. Therefore we claim that any regulation regarding a TSO – TSO cooperation should not hinder the future integration by establishment of a regional balancing auction office.

We cannot agree with the principle in (5.1.) and we want to stress that also the provision of balancing products is a trade (not the activation!) and we see that this is not respected in the argument at Footnote 12. We also oppose to Footnote 13 as it has to be mentioned that a capacity contracted for the provision of balancing products is used even especially for that purpose: providing the fulfilment of the contract. In this sense at the reference to EC – Regulation 1228/2003, Article 6(3) the provision of balancing products (capacity and energy) has to be defined as commercial activity.

As the example at 5.2 at page 21 should be criticised by this point of view: the capacity is not only used by activation of a balancing reserve – at the moment of establishing a contract (independent if it is used for energy flows or for reserve provision) the transmission capacity has to be defined as used.



Datum: 16.03.2009  
Empfänger: CEER  
Betreff: ERGEG Public Consultation

TIWAG-  
Tiroler Wasserkraft AG  
Postfach 78  
A-6010 Innsbruck  
www.tiroler-wasserkraft.at



Additionally we want to claim for all regulations regarding Market Monitoring that criteria for Transparency should be established in the same kind as it is done for other product at the electricity market. Generally Regulations might promote market harmonisation and reduction of discrimination but we think that there is no need for particularities for the Balancing Market.

Kind Regards  
TIWAG-Tiroler Wasserkraft AG

*M*

Dr. Paul Reimeir

Dipl.-Ing. Edgar Röck

