

Enel comments on:
**“Draft revised ERGEG Guidelines of Good Practice for
Electricity Balancing Markets Integration (GGP – EBMI)”**

For any information please contact:

Paolo Chiricozzi

Enel S.p.A.

European Regulation and Antitrust

Avenue des Arts 13-14

B-1210 Brussels

Ph: +32 2 211 0224

Fax: +32 2 211 0230

Mobile: +32 476 997842

Italian Mobile: +39 320 4980242

e-mail: paolo.chiricozzi@enel.com

Introduction

Enel appreciates and basically shares the content of the Draft Revised Guidelines on Balancing Markets Integration ERGEG submitted to public consultation process.

We strongly believe that the good management of balancing markets is an important step towards the creation of a single European market. Moreover, Enel wants to stress the benefits coming from the integration of balancing markets, such as the increase of competition, the increase of security standard, the access to a diversified generation technology mix. Synergies deriving from this integration process will likely produce a significant decrease in reserve procurement costs, a minimisation of balancing costs and a more efficient use of generation plants.

Specific comments

Guideline n. 5.2 – Charge on access to interconnection capacity

About the access to interconnection capacity, we agree with the provision of prohibiting any charges regarding balancing energy, in order to maximise opportunities for cross border balancing; on the other side, we also share the choice to exempt merchant lines from this provision.

Guideline n. 7 – Model for cross border balancing

Enel does not share the ERGEG preference for the TSO-TSO model for cross border balancing and believes that the TSO-BSP system should be preferred.

In the TSO - BSP model, the single operators directly participate in the balancing markets of the neighbouring TSOs with relevant benefits:

- the process is leaner and faster, since bids from the operators are not preliminarily filtered by their respective TSOs;

- the process can be implemented in the short term even if the harmonization of the balancing schemes is not complete yet (with particular reference to the time of gate closure).

On the other side, till a complete harmonization of the balancing markets, the TSO-TSO model would not allow TSOs to purchase the cheapest resources and operators to participate in the balancing markets of neighbouring TSOs.

As it is important not to delay the introduction of cross – border balancing processes, Enel proposes to implement the “TSO – BSP system” at least until the completion of the harmonization process has not achieved an advanced stage.

Guideline n. 9.1 – Transparency and n. 9.2 Public data

Enel agrees on the importance of transparency for the effective functioning of the integrated balancing market, but we would also like to underline that the anonymity of the operators should be assured and that commercial sensitive data should be protected.

In particular, data aggregation should be aimed at avoiding that information on individual operators or plants are directly published or can be derived from published data.