

IBERIAN TASK FORCE

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Dear Sirs:

The Iberian section of the European Federation of Energy Traders – EFET TF Iberia, welcomes the two ERGEG consultations on “Coherence and Convergence Report” and “Compliance Monitoring Report” and acknowledges the work carried out by the Regulators to analyze the degree of harmonization among the different markets.

However, we consider that the documents do not cover all the issues necessary to solve the present problems in the Energy Market in order to achieve a real integration. Regarding the South West European Region, where the activity of our Task Force is focused, we would like to express our concern on three main topics, that we also presented in the last SWE SG meeting.

1. - The approval of the IPE rules, for the regulation of the explicit auctions in the SP-PT border, is urgently needed and this decision cannot be postponed due to the establishment of the common auction platform in the region supported by the regulators.
2. - The ERGEG documents do not make any references to the prohibition to some Spanish players for importing electricity from France. This situation hinders an efficient use of the interconnection, because it reduces competition, and it is difficult to understand considering the publication of the CNE report on VPP and CESUR in which the CNE admits that the rule applied to define the agents subject to this prohibition, “the 10% rule”, is not the right way to assess a potential abuse of dominant position.
3. - The day-ahead market coupling between MIBEL and CWE should be a priority for both market operators (Powernext and OMEL) and system operators (RTE and REE) and it would be necessary to have as soon as possible the timetable for its implementation.

Please do not hesitate to contact us if you require any further information.

Sincerely yours,



Antonio Canoyra
Secretario General IETF