

UNESA POSITION ON THE TARGET MODEL IMPLEMENTATION IN THE ERI-SWE

In the framework of the 6th SG meeting, UNESA would like to state its strong support to the necessary Spanish and Portuguese market reforms conducted to implement the European Target Model in the ERI-SWE.

UNESA's members advocate the adoption of European Target Model without any exclusive design or peculiarity in the MIBEL not fully supported by the majority of the ERI-SWE stakeholders and accompanied of a cost-benefit analysis.

In particular, UNESA supports these initiatives:

- Long term auctions
 - Removal of the ban on imports of energy from any EU country outside the Iberian Electricity Market imposed to “dominant operators” as soon as possible.
 - Development of a common platform for France- Spain and Spain-Portugal interconnectors.
- Market coupling of day-ahead markets:
 - The implementation of MIBEL DA-MC with CWE needs a high degree of harmonization between both regions. The initiatives from Regulators and Operators in order to adjust the future operation on the Single Market, as balancing perimeters definitions or DA bidding formats, would facilitate this process and would set the basis for a sound competition.
- Cross-border balancing model:
 - Interim proposals of TSOs have to be boosted.
 - But the aim should be to create an integrated balancing market with common merit order.
 - To take advantage of the European interim intraday trading facility, REE should open the border with France to free trade, allowing participants to trade through the interconnector after the ID market and up to the moment when the schedules become firm to be managed by the automatic regulation control.
- Governance framework of the ERI-SWE:

- Member States and a representation of ACER should integrate the Regional Steering Committee.
- The creation of a Regional Advisory Group would allow stakeholders to analyse proposals of the Implementation Group before approval by the Regional Coordination Committee (like AESAG - ACER Stakeholders Advisory Group)
- More frequent Stakeholder Group meetings are needed (at least two per year).