

## Presentation Outline

In the next 10 minutes, I will cover the following;

- 1. The Background— why we are reforming the market design and what is the process.
- 2. What we can improve— Changes that will make our energy system resilient and ready for net zero
- 3. Assessing Commission's proposal— Elements we like and elements we think can be improved

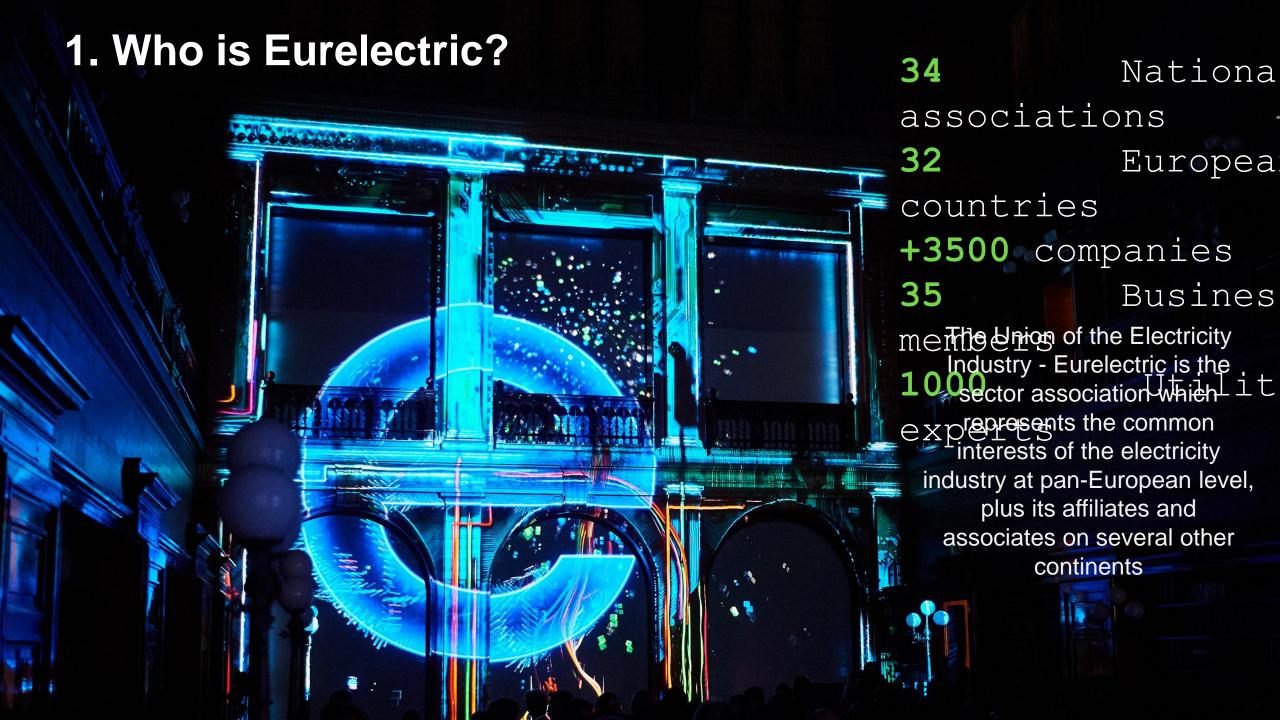


## Presentation Outline

## In the next 10 minutes, I will cover the following;

- 1. Who is Eurelectric?
- 2. The Challenge why market design needs to facilitate the colossal level of investment needed to reach net zero
- 3. Learning from the Crisis— What we have learned from the energy crisis and how can we make the system more resilient
- **4. What we can improve** Changes that will make our energy system resilient and ready for net zero
- 5. Assessing Commission's proposal— Elements we like and elements we think can be improved





# Our mission is to lead Europe's energy transition with clean electricity

# Commitment towards our members



Provide effective representation for the industry in public affairs



Ensure that electricity-based solutions have access to funding and financing across Europe



Communicate the benefits of clean electricity throughout our media channels

# Our Values

#### Societal engagement

Through electrification to contribute to job creation, air quality, energy savings, customer convenience and reduced dependency on imported fuels

### Transparency

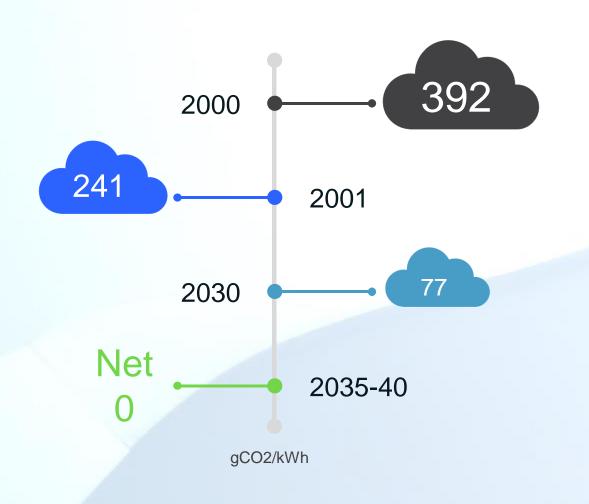
### Climate leadership

Through commitment, innovation and proactiveness in driving the decarbonisation & electrification agenda

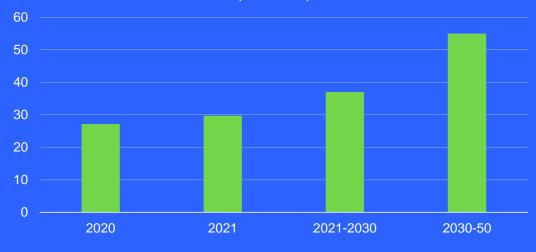
We are a signatory of the EU Transparency Register. All our activities can be accessed in our papers and letters and are reported in our advocacy meetings register.

## 2. The SCALE of the cha

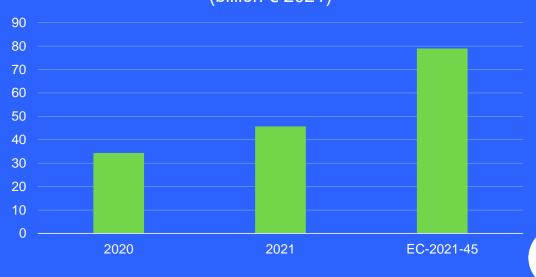
Speedy decarbonisation, colossal investment in electricity



## Investments in distribution grids in EU-27 (billion €)



## Power generation investments in EU27 (billion € 2021)



## The SCALE of the challenge

Massive electrification of end-use sectors, with electricity's share more than doubling in size

A dramatic change by 2050

Electricity to represent 60-70% of final energy demand



200 million heat pumps and decarbonised district heating will be brought to European buildings





passenger EVs will be on European roadsROAD





For heavy industries, the figure will reach 25%.





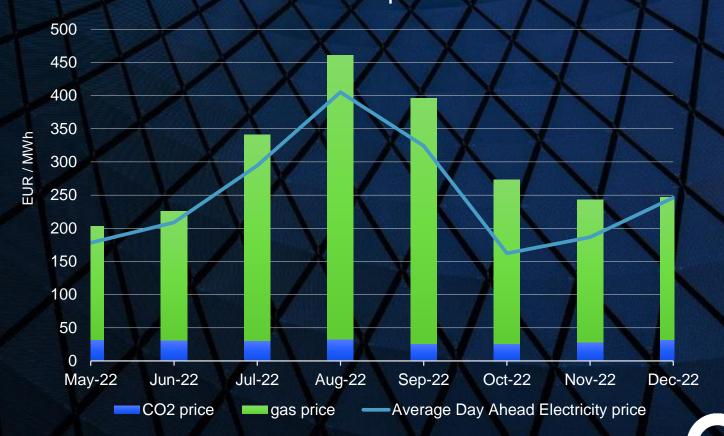
# 3. Learning from the crisis: what can be further improved



# Learning from the crises - the vulnerabilities and improvement needed

- Short-term markets are exposed to the extreme price fluctuations of imported fossil fuels.
- Liquidity in the forward market is necessary to hedge against spot market fluctuations

EU average: gas price effect on electricity prices



## Our key message for today

The primary focus of the reform should be on further **developing long-term markets** 

In reforming Europe's market design we need to:



Preserve what works: the EU Internal Energy Market based on marginal pricing, & its key features & Implement current legislation (CEP)



**Develop a long-term market to**; 1) protect customers against excessive price volatility by offering them more choice and 2) promote the colossal level of investment needed.

Strong long-term markets will be a win—win-win for:



#### **CUSTOMERS**

= more competitive and predictable prices with less fluctuations



### INVESTMENT

S

= more competitive and predictable prices with less fluctuations



## SECURITY OF SUPPLY

= more competitive and predictable prices with less fluctuations



## 4. What can we IMPROVE?

How to make the electricity system ready for the net 0

1

2

3

4

5



## + Customers choice

A better choice of short- and longterm products.

Access to supply offers based on risk profile and individual needs.
FOR MORE PRICE
STABILITY



Forward hedging, voluntary PPAs and CfDs, all have a role to play.

FOR MORE POSITIVE INVESTMENT SIGNAL



High collateral requirements reduce liquidity in forward markets.

We must widen the types of non-cash collaterals. FOR MORE LIQUIDITY IN FORWARD MARKETS

# Investments in grids

Distribution grids are the backbone of a decentralised and decarbonised system.

FOR MORE RENEWABLE



# + Flexibility & storage

Proper incentives
will promote
flexibility,
storage services
& assets.

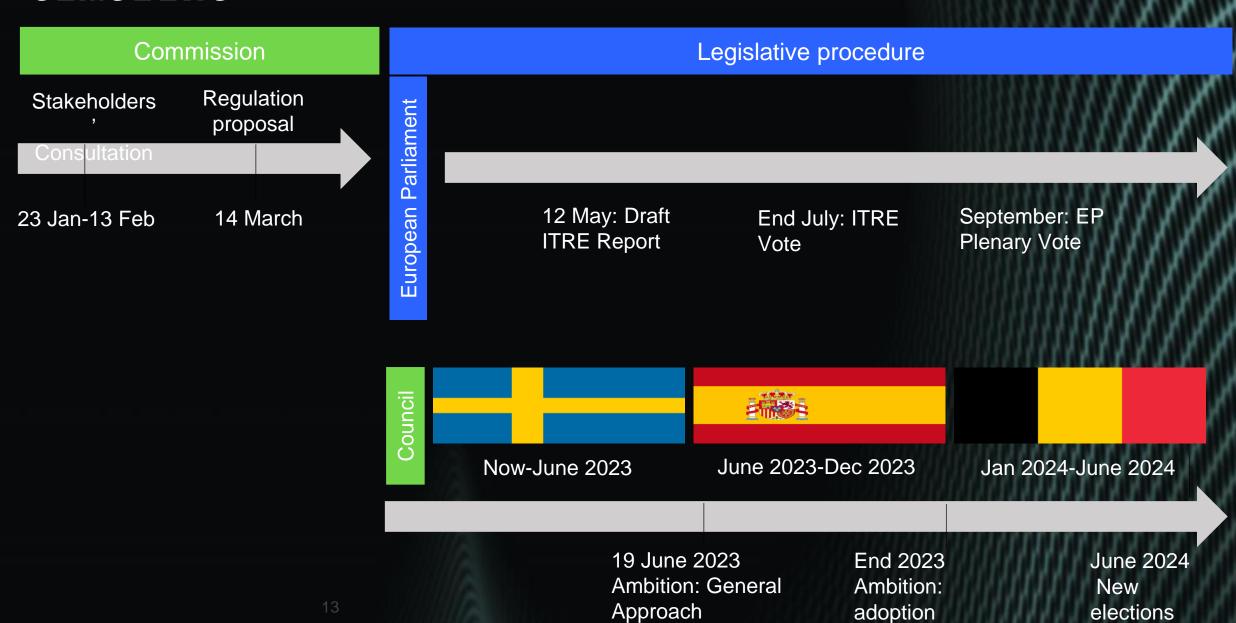
FOR AN EFFICIENT USE OF RENEWABLE ENERGY



# 5. Assessing the Commission's Proposal



## Market design review - EU institutional timeline



## Files assignments European Parliament

epp

# **EMD** review





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**REMIT** review



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# Our assessment on the European Commission's proposal

Retaining merit-order and marginal pricing across wholesale markets

1

Focus on forward markets through enhanced hedging and contracting

2

No mandatory requirement for twoway CfDs 3

No extension or institutionalisation of revenue limitation for inframarginal technologies

4

Promote anticipatory investment in grid tariff design

5

Hedging obligation on suppliers:
Stress tests & reporting
requirements through licencing
Regional virtual trading hubs:
Non-tested solution with lengthy

Energy Sharing: Ensure level playing field with traditional supply to ensure customers protection

implementation time

Flexibility/peak shaving: no technology-neutral & market-based approach

Fail to properly address massive grid investment challenge: ensure proper grid tariff design









## Eurelectric's views & proposals

Forward/ PPAs/ CfDs

### Our reaction

- If well designed, **forward, PPAs & CfDs are complementary hedging tools** to support needed investments & protect customers against short-term volatility depending on their risk profile & needs
- Good to incentivize MS to remove barriers in LT markets & contracts and go for voluntary implementation
- 2 Virtual Hubs
- Theoretical, complex, lengthy to implement (5-10 years)
- Fail to address immediate liquidity issues (low volumes, collateral constraints) & risky for both TSOs and market participants
- Such set-up is already possible to implement Too premature as target model as part of the primary legislation
- Hedging Obligations
- Risks impacting retail competition and hence customers choice by regulating particular hedging strategies and tying them to particular products
- Risks of locking in high prices depending on when the hedging is done.
- Grid Investment
- Not enough incentives for anticipatory investments needed to address the massive grid investment & digitalisation challenge required to electrify further.

- 5 Energy Sharing
- Expands energy sharing beyond the existing framework of P2P and energy communities
- If not properly regulated, it poses a risk to customers, suppliers and system operators

## Our proposed way forward

- For existing assets: no retroactive changes and/or mandatory implementation
- For new assets: key to maintain contractual innovation
- Settlement of CFDs should be left to the discretion of MS: targeted to vulnerable customers and/or to finance the energy transition
- Delete provision address through the revision of Forward Capacity Allocation Guidelines to allow proper impact assessment
- Go for more practical evolutions of the current set-up (more frequent auctions, higher volumes, longer-term products at least up to 3 years)
- Shift this from obligations & normalisation to robustness checks & reporting obligations to be completed by the regulator
- Maintain a marke-based approach to allow for supply offers innovations based on demand
- If supply offer obligation are maintained, pair with possibility for suppliers to charge cost-reflective early termination fees
- Ensure that network tariff design provide the right incentives to SOs
- Optimise the incentives and remuneration schemes between CAPEX and OPEX to allow a timely recognition of traditional investments in physical networks and adequate returns, with a flexible reflection of operational costs.
- Ensure derogations to traditional supply are not normalised to ensure adequate customer protection
- Clarify the responsibility of payment for associated taxes, levies, and network charges.
- Ensure the local nature of energy sharing is preserved while leaving flexibility to the MS to decide proximity requirement powering people

## 

# EMPOWER CONSUMERS

- 1. Accelerate smart meter deployment in all Member States
- 2. Adopt guidelines for flexible resilience to stress-test suppliers
- 3. Properly implement articles 13, 15, 17 & 32 of the Electricity Directive

# INVEST IN GENERATION

- 1. Ease collateral requirements in forward markets
- 2. Address national barriers for PPAs and other long-term contracts
- 3. Provide dynamic guidelines for CfD design

# STRENGTHEN RESILIENCE

- 1. Improve regulation on capacity mechanisms
- 2. Enable cross-border hedging
- 3. Adjust remuneration to incentivise digitalisation and automation



# Long-term contracts Key for the build-out and mitigating price volatility

By 2030, investment needs are colossal: +700 GW new RES plus the renewal of existing capacity, build out of storage and demand response. Long-term instruments are a "must have" to deliver at such scale.

## 4 long-term instruments

## LONG-TERM HEDGING /CONTRACTING

- Enhance the liquidity by removing barriers
- Ensuring that TSOs facilitate cross-border forward hedging
- Consider voluntary market making

## 2 DIFFERENCE (CFD)

- Keep as a complement to market-based investments
- Consider implications on forward markets and public budgets

## POWER PURCHASE 4 AGREEMENTS (PPA)

- Standardise to make them tradable
- Reduce credit risk through aggregation and pooling

## 3 MECHANISMS

- Apply where needed
- Allow for different technologies

#### YES TO CFDS... BUT WITH CAUTION

- They should be used on a voluntary basis only
- There is no 'one-size-fits-all' CfD an adequate design matters
- A massive use of CfDs would raise questions on how to pass costs to customers and hinder liquidity on forward markets

