

**All Baltic CCR TSOs' proposal for the  
fallback procedures public consultation  
responses and TSO reactions**

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16<sup>th</sup> May 2017

During public consultation process on “All Baltic CCR TSOs’ proposal for the fallback procedures”, Baltic CCR TSOs received response only from one party – Nord Pool AS.

Question	Comment	All TSO Response
Do you agree that the fallback operator’s will initiate fallback procedure in the event if NEMO (or NEMOs) is not able to determine the day-ahead implicit allocation results as prices and scheduled exchanges before 20:00 (CET) on the day prior to the delivery day on one or on all bidding zone borders? - Explain you answer	<p>"Provided that the “fallback operator’s” in this case refers to the given NEMO(s) that is (are) Designated in the Baltic States for being part of Single DA Coupling then we agree with that statement.</p> <p>Furthermore, unless subsequently agreed differently among all relevant parties, e.g. NEMO(s) and TSOs, and approved by all relevant NRAs, the Fallback should then be as stipulated in Article 3.2 of the All Baltic CCR TSOs proposal for fallback."</p>	Comment is noted
Do you agree that the fallback operator’s deadline for completing is at 20:00 (CET)? - Explain you answer	We agree with that deadline, and among others since that is the practice today both in the Baltic and the Nordic region where we since many years have operated Day Ahead Coupling in a coordinated manner.	Comment is noted
Do you agree that the results from a Previous Day should be used in the unlikely event that the fallback operator is not able to solve the problems by 20:00 (CET)? - Explain you answer	We agree with that proposal, and among others for identical reason as clarified for the previous question (5).	Comment is noted
Any other views on the proposals are welcomed - Explain you answer	<p>"While it might not be strictly necessary, we find it would be very clarifying if an additional clause was added in the beginning of Article 3 with the following effect:</p> <ul style="list-style-type: none"> <li>• Fallback procedures shall be initiated in CCR Baltic when Single Day Ahead Coupling (SDAC) declares full decoupling or a partial decoupling.</li> <li>• Fallback shall in its first step (from declaration of SDAC decoupling until 20:00 CET) be carried</li> </ul>	<p>Comment is noted and the amendments in Article 3 are imposed by additional clauses:</p> <ol style="list-style-type: none"> <li>1. Fallback procedures shall be initiated in Baltic CCR when single day-ahead coupling declares full decoupling or a partial decoupling.</li> <li>2. In the event of full decoupling or a partial decoupling before the 20:00 (CET), the</li> </ol>

	<p>out by the relevant NEMO(s) using the SDAC system in a regional setup to calculate net positions and prices for each bidding zone in CCR Baltic.</p> <ul style="list-style-type: none"><li>• The calculation shall include the network data and order data of CCR Baltic that was part of SDAC for the given day.</li><li>• The calculation shall also be fully coordinated with the fallback procedure of Nordic CCR, thus unless it being impossible at the time, also the network data and order data of Nordic CCR and on the interconnector(s) between Nordic and Baltic CCRs shall be included in the calculation.</li></ul> <p>The reasons for these proposed additions are that (1) the procedures would be aligned with the practice today, (2) the price formation within Baltic and Nordic CCRs would be more efficient that way in cases of SDAC decoupling, and (3) the timelines for initiating fallback, the permission to continue calculation process until 20:00 CET, inclusion of all network data and order, and usage of Previous Day results in case no result reached by 20:00 CET also applies in the Nordic CCR TSOs fallback proposal."</p>	<p>relevant NEMO (or NEMOs) shall use the single day-ahead coupling system in a regional setup to calculate net positions and prices for each bidding zone of Baltic countries with the goal to keep Nordic and Baltic bidding zones coupled, unless it being impossible at the time.</p> <p>3. The calculation mentioned in Article 3(2) shall include the network data and order data of Baltic and Nordic CCRs that was part of the single day-ahead coupling for the given day, unless it being impossible at the time. The calculation shall also be coordinated with the fallback procedures of Nordic CCR and Hansa CCR.</p>
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