

COMMENTS SUBMISSION

B. Topics Discussion

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S/N	Topic Title	TSR Approach (please provide for a short description of the TSR approach according to your understanding)	TSR reference (please name the paragraphs and sections' number where the topic is addressed within the TSR)	Proposed Approach and Reasoning (please provide your approach and reasoning on the topic)	Proposed text Modifications (please copy those segments of the TSR where the topic is addressed and insert your proposed modifications in track changes)
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1	Relative Size of the Day Ahead Market (DAM) Vs Forward	---	Section F & G	The success of the Hybrid Model suggested by the TSO is based on the market having the right mixture between the DAM and FM, which should give the market adequate liquidity and depth. This is also	---

	Market (FM)			identified by the consultants. Evidence from similar markets internationally adopting the hybrid model, indicates a mixture of DAM:FM of between 30:70 to 40:60. We suggest a middle of the road ratio of 35:65	
2	RES Aggregator Ceiling	is an entity representing aggregately many RES Units possibly at different locations and operating outside National Grant Plans, for an overall aggregated size (installed capacity) of RES Units from 1 MW up to 20 MW	Section B and analyzed in several sections based on each section subject	As the predictability of RES output is much more difficult compared to conventional units, it is important that the aggregator minimizes his portfolio production fluctuation, and one of the most obvious tools is to have the possibility to disperse his output to a number of units. The higher the dispersion the better the overall predictability level. The suggested 20MW ceiling is way too low, especially if we take into account that our unit will be of 50.76MW. A more appropriate RES Aggregator level of at least 200MW, or even no ceiling, would help us achieve the desired predictability. We also suggest that, in the forward market, the inclusion of conventional units in the aggregation be possible.	---
3	RES Forecasting Error Vs Daily Half Hourly Program Schedule	---	---	<p>Tolerance for such forecasting errors Vs Daily Half Hourly Program Schedule should be large enough for RES producers. We suggest that should be allowed to revise their forecasts for their next half hour and be penalized only for deviations from such half hour forecast.</p> <p>Due to the absence of an Intra-Day market, and until such a market is operated, we suggest that, at least for</p>	---

				an initial say 7 year period, and within certain limits say 20%, be paid the market rate for their upside intra-day imbalances but not be balance responsible and pay for their downside intra-day imbalances.	
4	Battery Storage	CERA Approach	---	We propose that we have the option to use the imposed battery storage of 15MWh on our power Plant on a system basis, so that the said battery storage be used for the benefit of the whole grid system and not be dedicated for our power plant only. The same should also apply to all other battery storage imposed on other producers in the future. A possible solution is to the battery storage operation as a different business entity offering ancillary and other services to the grid.	---
5	Transparency	The Transmission System Operator shall publish all information relevant to the system operation as per the EU Regulation 543/2013 and report data under the provisions of the Regulation on Wholesale Energy Markets Integrity and Transparency	Section A Paragraph: 6.1.3 & 7.1.4	We propose that before the DAM market opens, all producers should be in a position to have the whole and detailed picture of the capacity availability, available capacity per half-hour interval that can be utilized in the DAM, per power generator in the TSO platform. We understand that is a REMIT requirement in any case. Furthermore, all functions/formulas/restrictions/constraints taken into consideration by the TSO to formulate the ISP scheduling should be transparent and publicly available on the TSO platform, in such a way so that producers should be in a position to calculate their own ISP.	---

		(REMIT).			
6	Security Cover Requirements	---	Section I 5.2 Volume Factor	We propose the following changes (a) market experience weight to count from the date the market starts operating. (b) relative size should Not reduce the requirement for security cover but on the contrary it should Increase it, since any default from such a relatively large size entity would have a greater impact and even jeopardize the whole market.	---
7	Format of Balancing Energy Offers	There will be a balancing on both downwards and upwards	Section H1 paragraph 7.2	Any curtailment ordered by the TSO as a result of ISP scheduling should be replenished at the marginal/incremental cost avoided by the producer curtailed. For RES producers (wind and solar) this s practically zero as there is no fuel, and therefore such curtailments should be replaced at zero cost and should preferably not be allowable.	---