# **CWE FB MC – Flow Based Users Group**

Meeting minutes, 27<sup>th</sup> of March 2014

Version	1			
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Author	Zineb LAZRAK			
Name	Company		attendees	excused
MARKET PARTIES				
	Thomas RINKE_Statkraft		X	
	Michael TENVENNE_Statkraft		X	
	Kilian LEYKAM_VATTENFALL		X	
	Thorbjörn VEST ANDERSEN_VATTENFALL		X	
	Guillaume LANDENNE_GDF SUEZ		X	
	Pedro ALMEIDA_GDF SUEZ		X	
	Gaia MORLEO_Gazprom M&T		X	
	Branko Knezevic_Gazprom M&T		X	
	Frieder KALISCH_EnBW		X	
	Hervé ROBERT_ALPIQ AG		Х	
	Peter AGH_CEZ		X	
	Michael BONDE_EON		Х	
	Julien HAURE_EDF Trading		X	
	Filippo PIROVANO _EDF Trading		Х	
	Patrick AVIS_EDF Trading		Χ	
	Michael PICHLER_EuT		Χ	
	Philippe BRAMMEN_STEAG		Χ	
	Yves-Denis Schönenberger_AXPO Trading		Χ	
	Vincent VISSER_ENECO		X	
	Matthias GROTE_BDEW		X	
CWE PARTNERS				
Philippe NOURY	RTE	FB expert	X	
Joel HOEKSEMA	APX	FB expert	X	
Philippe VASSILOPOULOS	EPEX SPOT	Head of product design	X	
Sylvie TARNAI	EPEX SPOT	Market Communication TF Leader	X	
Dietmar BECK	Amprion	Regulators referent	Χ	
Pieter SCHAVEMAKER	e-bridge	FB expert	X	
Christiane STUT	Eurogroup	PMO	X	
Gertjan MEUTGEERT	Eurogroup	IT PMO	X	
Zineb LAZRAK	Eurogroup	PMO	X	

# Agenda:

- 1. Project Status
- 2. Transparency
- 3. Intuitiveness
- 4. Public consultation and market forum
- 5. AOB

# **1** Project Status

#### CWE Project Partners informed about some major achievements since the last FBUG meeting:

#### Parallel Run

- o ID ATCs, derived from the FB domain, have been published retroactively since the start of the parallel run.
- Following Market Participants' wishes, data retrieval of PTDF matrices has been facilitated via the ftp server and an indicator for non-intuitive cases has been added in the publications.
- The parallel run publication switched from weekly to daily as of February 25<sup>th</sup>, with a retroactive publication for days as of February, 19<sup>th</sup>.
- A note on methodological changes implemented in the parallel run in 2013 has been published on CASC website: http://www.casc.eu/media/FB%20Methodological%20changes Final.pdf

### • MP dialogue

 Bilateral discussions on transparency took place in the beginning of 2014 in order for Project Partners to better understand MPs' concrete needs for reliable price forecasting. The aim of today's FBUG meeting is to follow-up on these bilateral discussions.

#### **CWE Project Planning**

After the launch of the daily parallel run publication in February, the project's efforts are focused on the delivery of the TSO
FB system end of May for Full Integration and Simulation tests.

<u>Question/Concern from MPs:</u> What is the difference between the industrialized version released end of May for integration tests and the previous version used for the daily external parallel run?

<u>Project Answer:</u> The version expected for end of May contains only necessary improvements for test purposes (connectivity, links and infrastructure) but has no impact on the FB method and computation of FB parameters which can be considered stable as of the launch of the daily parallel run.

- The project is currently working on an update of the NRA Approval Package which is to be submitted to NRAs by May, 9<sup>th</sup>.
   This document is foreseen to be used by NRAs as a reference document for the public consultation foreseen for June 2014.
- Project Partners foresee a readiness target date by the end of September with an 8 weeks contingency period related to dependencies as MPs' readiness, IT system readiness and successful testing, appropriate management of interactions with other extension projects as well as availability of other NWE/SWE parties for testing.

### Impact of NWE Go Live on CWE FB parallel run and publication format

Following NWE Go Live and questions raised by MPs on the Q&A Forum, the project clarified the changes in the parallel run
publication format. These answers will also be available on the Q&A Forum.

Question/Concern from MPs: Since which date exactly is the report based on the industrialized tool?

<u>Project Answer</u>: The change of report is not linked to the usage of the industrialized TSO FB common system by the CWE TSOs since February, 12<sup>th</sup> but rather to the launch of NWE MC supported by the EUPHEMIA algorithm, as of February, 5<sup>th</sup> (delivery day).

<u>Question/Concern from MPs:</u> What is the scope of the parallel run simulations?

<u>Project Answer:</u> Simulations of the daily parallel run are performed in the full NWE + CWE region. However, as the necessary agreement has not been obtained, NPS prices are not published.

<u>Question/Concern from MPs:</u> Why has GB2 been added in the MCP sheet and why is it not present in the MCV/NEX/Welfare sheets?

<u>Project Answer:</u> The GB2 index is published in the parallel run because it is the one corresponding to the GB hub operated by APX whereas the GB1 index is operated by NPS (N2EX) for which no publication permission has been granted. However, as both GB hubs are interconnected by an infinite ATC under NWE, there is no difference between both indexes as long as there is no decoupling.

#### Welfare notion

• The global welfare for now relates to the whole NWE region. However if NWE is further extended (e.g. to the SWE region), the notion of global welfare extends obviously to this new scope as well.

# "Rest" category

- "Rest" refers to countries outside CWE, but inside NWE. For now there are: GB, NO, DK, SE and FI, which means the NWE region including soon the SWE region minus the CWE region.
- Aggregated exchanges with areas adjacent to CWE are available indirectly. Two sets of net positions are published; global
  net positions and CWE net positions. Both are only published for the CWE areas. The difference between the global net
  positions and the CWE net positions are the exchanges on interconnectors to regions outside of CWE.

#### **Congestion Rent**

- The report provides surplus values per area, but congestion rent only per region. Two regions are considered: CWE and non-CWE. For the breakdown of congestion rent into CWE and "Rest" parts, the approach is the following:
  - CWE net positions and prices to compute the CWE congestion rent.
  - o Global net positions and prices of all areas to compute the overall congestion rent.
  - Difference is the "Rest" congestion rent including all congestion rent that is generated on links between CWE and adjacent areas (e.g. DE-DK1, DE-DK2, DE-SE, FR-GB, NL-RO).
  - The difference between the global CWE net positions and the CWE-only net positions are the exchanges across
    the aforementioned interconnectors. CWE net positions are the ones that remain inside CWE region and are
    therefore subject to the FB constraints.

Request from MPs: Would it be feasible to extend the parallel run publication to countries outside the CWE region so as to observe the impact of FB MC on the further NWE/SWE hubs?

Project Answer: This request was already explored by the project but there is a question of ownership and communication of data. The project encourages MPs to ask for support from NRAs/AESAG for the publication of this extended data.

#### Launch of daily parallel run

Since the launch of the daily parallel run, two days could not be published due to technical issue encountered on TSOs' side.
 Indeed, TSOs could not reach the private system that is used to perform a local analysis of common results which prevented the launch of the final computation.

<u>Question/Concern from MPs:</u> Are back-ups implemented to handle a situation when daily FB parameters cannot be provided, especially after Go Live? When does the project aim to stabilize the process?

<u>Project Answer:</u> The project explained that for now, 6 months ahead of target Go Live date, the objective is to have a solid sample of parallel run data for analysis purposes. As one missing day per month does not question the representativeness of the overall parallel run data, exceptional missing days are acceptable while obviously the project has to fully stabilize the process for Go Live. For Go Live, a technical redundancy will ensure the provision of FB parameters in any circumstances.

Concern from MPs: Unavailability of Shadow Auctions for the FR-ES border can have an impact on CWE.

<u>Project Answer</u>: Fallback procedures for the Iberian Market are not in scope of the CWE project. CWE Fallback procedures will therefore only describe the principles to be applied inside the CWE region.

Question/Concern from MPs: How to explain delays encountered in the publication of daily parallel run results?

<u>Project Answer</u>: For concerned days, TSOs have delivered the FB Parameters in time but some delays in the simulation have led to a delayed publication. Project Partners would however like to stress that a delayed publication is not linked to difficulties on TSOs' side to compute the FB parameters, but is mainly related to the fact that the parallel run is still a project phase that is performed with test environments and simulation facilities. A delayed publication has no impact on the results itself.

### General parallel run performance

 A yearly report of parallel run indicators for 2013 has been published on the CASC website: <a href="http://www.casc.eu/media/CWE%20FB%20Publications/AggregateWeeklyResults">http://www.casc.eu/media/CWE%20FB%20Publications/AggregateWeeklyResults</a> 2013.pdf

Question/Concern from MPs: Why are FB results (welfare gains) sometimes not as high as expected?

<u>Project Answer</u>: Theoretically FB takes more accurately into account the TSOs' constraints, generally leading to a bigger domain under FB than under ATC. However, in some cases, due to the fact that Remedial Actions are explicitly taken into account under FB, the FB domain might not include some exchanges that are feasible under ATC but allow for others in another direction.

- The figures demonstrate that the Social Welfare increased of 79M€ (307 days simulated of 365) for 2013 with an average daily gain of 257 k€.
- The general overview on the representativeness of parallel run results since 2013 until now shows the increased stability of the process.
- The welfare overview until week 12 demonstrates a general trend of higher welfare under FB than under ATC, besides a few exceptions encountered in 2013 for week 10, 13 and lately for week 32 and 33. The congestion rent decreases, suggesting that the market spreads narrow and more exchanges are possible under FB than ATC, indicating an increasing surplus for the market.

Question/Concern from MPs: What is the scope for the social welfare calculation? Is it including CWE regions only or external regions as well?

<u>Project Answer</u>: Social welfare is calculated on internal CWE borders only.

• The price convergence overview illustrates a higher price convergence under FB as more trading opportunities are allowed.

#### MPs' feedback on the general parallel run performance

Request from MPs: Is it possible to publish the block orders?

<u>Project Answer</u>: For confidentiality reason, APX does not publish this type of information. For EPEX markets, it is published but not within the parallel run.

The Project Partners will assess this request internally and provide Market Partners with feedback.

- Following the latest parallel run results, EFET shared some observations for which feedback from the project is asked for:
  - EFET demonstrated that a missing parallel run day can have an important impact on welfare. For example, the average welfare increase (CWE FBI-ATC) is 84k€/day or 31M€/year: mainly due to a windy weekend (15-16/03/2014), whereas only a welfare increase (CWE FBI-ATC) of 27k€/day or 10M€/year is established when those two days are discarded.
    - The project and MPs agreed that it is important to have the most maximum number of days published.
    - On the project side, all efforts are put together to meet this objectives as soon as possible even though no
      commitment for a perfect stability of the process can be given at this point, which is acknowledged by
      market parties
  - EFET also pointed out that in week 11-12 for example, 4 days out of 7 showed a welfare reduction compared to ATC, with the ATC result being unfeasible under FB.
    - Project Partners explained that constraints are taken into account indirectly when computing the ATCs. The use of a Remedial Action is studied in order to anticipate a potential increased ATC. In fact, TSOs will consider the same issues in the grid under ATC and FB and associate the same Remedial Actions in face of specific events. Risk policies under FB and ATC are therefore the same. The difference however is that under FB Remedial Actions are taken into account explicitly in the capacity calculation process As a consequence, the domain under FB might happen to be smaller than under ATC, or rather be shifted in one direction potentially not allowing all corners feasible under ATC.

<u>Concern from MPs</u>: MPs expressed their concern on the obligation to respect the same risk policies under FB(I) and ATC.

<u>Project Answer:</u> Project Partners stressed the fact that risk policies are the same in ATC and FB and that they are controlled by NRAs.

<u>Request from MPs</u>: Would it be possible to provide MPs with categories of Remedial Actions per Critical Branch on a weekly basis for analysis purposes? MPs mentioned the data publication in the US as a reference.

<u>Project Answer:</u> The project underlines that the US and CWE are two incomparable models with different authorities and frameworks. In any case, a comparable level of detailed as provided in the US cannot be the aim for CWE, simply because of confidentiality reasons.

#### MPs' feedback on initial ID capacities under FB MC

<u>Concern from MPs</u>: EFET wonders why ID capacities from the parallel run are smaller than the current operational ones, especially as during the last Market Forum an impact on ID capacities has not been highlighted.

<u>Project Answer:</u> Project Partners underline that the initial ID ATC capacity that is computed from the FB domain, represents left-over capacity only, whereas the operational ID ATCs are the result of an operational process. As such, a one-to-one comparison between the two values is not enlightening. Anyhow, the more accurate capacity calculation and more efficient allocation at the Day Ahead stage may result in reduced Intra-Day capacities.

Question/Concern from MPs: MPs stress the fact that indeed initial ID ATCs from the FB parallel run cannot directly be compared with current ID ATCs as bilateral actions on ID ATCs are not simulated in the parallel run.

<u>Project Answer</u>: The project explains that it is not possible to anticipate these bilateral actions. The computed initial ID ATCs values give however a first view on ID-capacity-levels. .

Question/Concern from MPs: Can the FB ID ATC values be bigger than the current ID ATC values for all directions?

<u>Project Answer</u>: If the ATC domain is inside the FB domain and there are no congestions, this can lead to the situation where the initial ID domain resulting from the FB domain is bigger than the ATC one for all directions.

Request from MPs: Would it be feasible to provide MPs with a comparison of the current initial ID ATCs and the initial ID ATCs from the FB parallel run (i.e. the left-over capacities after the ATC MC and the FB MC)?

<u>Project Answer</u>: The project explained again its reluctance to publish such a comparison, due to the fact that the market clearing point under ATC and FB is a different one and the left-over capacity cannot be compared as such, but is willing to investigate the possibility to compare the left-over capacities of the current ATC MC with the initial ID ATC values from the parallel run.

The Project Partners will internally discuss this question and provide Market Partners with feedback.

# 2 Transparency

#### Summary of main requests made during bilateral discussions

- Project Partners presented an anonymous summary of the constructive bilateral meetings on transparency which have been organized via the FBUG and on a national level. The main concerns on the MPs' side are the predictability of prices over varying time horizons for asset management, maintenance planning, investment decisions, trading activities.
- Based on a large number of requests to facilitate price forecasting, the following 5 main requests were emphasized by all MPs:
  - Publication of aggregated PTDFs per border
  - o Publication of LT nomination
  - Publication of FBP at 8am in D-1 before LT nominations adjustments
  - Fixed labeling of CBs ex-post for correlation in several scenarios
  - o Impact of grid investment on FB Parameters
- Therefore, Project Partners identified the following most needed and feasible measures to further support MPs
  - Publication of Shadow Auction ATCs on CASC website
  - o Anticipated (before LT adjustment) publication of FB parameters at 8am
  - o Provision of "typical" FBP matrices, on the basis of shared hypotheses with market parties
  - o Publication of fixed, anonymized CBCOs, 2 days ex-post

# **Publication of Shadow Auction ATCs**

- Project Partners presented an illustration of the publication of Shadow Auction ATC (ATC results that will be published in
  case of decoupling) that is expected to be available on CASC's website by week 16. Shadow Auction ATC will be published
  together with Day Ahead Flow-Based Parameters at 10:30 am on a daily basis. The publication of the Shadow Auction ATC
  may help MPs to have a simplified view of the FB domain.
- MPs asked if it is also possible to publish Shadow Auction NTCs at 8am before the long-term nominations.

This request, which seems to be feasible from a technical point of view, will be investigated within the project.

#### **Explanation on LTA inclusion check**

- As Shadow Auction ATCs are computed starting from Long-Term Allocation (LTA) coverage, and following MPs' question
  regarding the link between systematic LTA coverage and security of supply, the project used the opportunity to further
  explain this point.
- As LT capacities are firm, they might lead to an artificial enlargement of the FB domain in order to cover these capacities.
   This potential increase is the only ex-post action applied on the FB parameters in the final computation. In case the LTAs would overload some CBs, virtual FB parameters/CBs will be created which do not correspond to physical grid elements.
   These virtual CBs might be below the sensitivity threshold of 5%. For cases where the linear FB model does not allow to

model complex operating conditions and corresponding Remedial Actions, TSOs have implemented an algorithm ensuring the coverage of LTA (long term allocated capacities) in any case.

Whereas some assumptions on flows outside CWE are taken into account in the capacity calculation, only LT nominations
inside CWE are considered.

#### Daily schedule

Project Partners clarified the PTDF calculation process. The initial calculation takes place in D-2 at 20:00 based on the
merged D2CF. The second intermediate computation, taking place in D-1 at 04:00, is the qualification phase whose results
will be send to TSOs for a security assessment to be sure that the FB domain is safe. The requested anticipated publication
at 08:00 would therefore already contain the security check and parameters would only be adjusted according to LT
nominations during the final calculation phase that results in a publication of LT adjusted parameters in D-1 at 10:30 with
an effect on the margins but not on the PTDFs.

#### Anticipated (before LT adjustment) publication of FB parameters at 8am

- The project is working on the impact assessment and the specifications of an anticipated (before LT adjustment) publication
  of FB parameters at 8am. The results so far seem to be promising.
- Project Partners explain that the aim is to publish these values on CASC's website after the final computation with random anonymized CBCOs. The target time for publication is 8am but in case of any issues in the final computation, this timing can obviously not be guaranteed.
- The project hopes that this publication will facilitate MPs' forecast of available capacities and bidding strategy before the official publication of FB parameters at 10:30.

#### Publication of fixed, anonymized CBCOs, 2 days ex-post

• The project proposes to publish 2 days after the Market Coupling, the list of fixed anonymized CBCOs, containing information on the geographical situation of the constraining line. The labelling used during the parallel run, whose publication is foreseen for May 2014, including retroactive publication until July 2013, will be the same as after Go Live. EFET's presentation highlights general acceptance of the Project's approach, except for the timing on D+2.

Concern from MPs: Why are two days needed to get FB parameters published with fixed anonymous CBCOs?

<u>Project Answer</u>: These two days are a security margin to exclude the risk of manipulation as it would allow the linking of parameters to a location in the grid. Theoretically, when knowing where a critical branch is located, parties can adjust their pattern to influence the prices or increase the constraints on TSOs' side, potentially triggering redispatch actions. Furthermore protection of critical infrastructure is an argument, not to present critical grid elements ex-ante or too early after operation (from operational experience, two following operational days can be highly comparable).

MPs seem very skeptical about this explanation regarding manipulation as from their point of view big players have a
general portfolio optimization plan and not a unit-per-unit strategy. MPs consider that the market manipulation risk is no
issue after the MC, meaning around 14:00 in D-1. Having this information available at this point of time, would however
facilitate MPs to make the forecast for the next days. Furthermore, publication of data in D+2 seems completely arbitrary as
two similar days could also be for instance two comparable Saturdays.

Project Partners will rediscuss the publication delay of fixed CBCOs internally and provide feedback to MPs.

# Provision of "typical" FB matrices

- For the provision of "typical" FBP matrices, Project Partners propose to build with MPs ten standard scenarios based on a chosen reference day for winter and summer (3rd Wednesday of a month according to ENTSO-E standards) for which variations in the D2CF will be applied. The idea is to simulate the effect of one variable at the time by changing one assumption (Generation, wind infeed, solar infeed, and load based on a country level). In addition to the pre-solved and fixed anonymous CBCOs, TSOs would communicate on their assumptions of the fundamentals which are the level of generation and load aggregated per country.
- As the preparation of these scenarios requires a lot of manual work from TSOs, the project proposes to make the computation on one single timestamp, at 10:30 for the peak hour.
- MP's feedback on the project proposal:
  - Potentially, this type of information is useful as it makes the link between FBP and the assumptions made by TSOs and sensitivity hypothesis more explicit.
  - However, the proposal is not sufficient as only ten samples for one single timestamp will not allow identification
    of patterns nor any reliable conclusions on MPs' side. MPs would at least need scenarios for a full winter and

- summer day (24 timestamps each). Not only the normals, but also the worst case scenarios with extremes are important.
- Moreover, MPs are not so much interested in backward scenarios but rather in a forward-looking approach simulating the effect of the commissioning/de-commissioning of power plants or units, according to TSOs' grid forecasts, on the PTDFs.
- Additionally, MPs request the publication of aggregated operational TSO data on a national level.
- All in all, following the project proposals, MPs prefer to focus on three main requests:
  - Provide more operational aggregated data about assumptions made by TSOs in the base case (D2CF) for the different hubs (exchanges, load, generation, wind, and solar) as part of the parallel run
  - Provide technical details of the grid. EFET refers to the publication made by National Grid as an example.
  - Provide scenarios integrating foreseen changes in terms of infrastructure (planned changes) and taking into account the commissioning and decommissioning of power plants or new interconnections projects. Based on the foreseen topology changes, simulate the effect of a stressed grid.
- The Project Partners will discuss internally MPs' new proposal and provide feedback. The project stresses however, that
  no commitment for Go Live regarding the future-oriented scenarios can be given. This data publication should be
  decorrelated from Go Live requirements.

Request from MPs: Can scenarios, based on foreseen grid changes for next year, be provided before the yearly auctions taking place shortly after Go Live? The market would also need a commitment or planning on how much in advance the information would be available (for instance 3 years before for a new interconnection).

Project Answer: The Project Partners will discuss internally but cannot commit at this stage.

#### Computation of bilateral exchanges

An explanatory note, containing the formula to compute BECs, was published on CASC's website thanks to which MPs can
derive the BECs by themselves if needed: <a href="http://www.casc.eu/media/CWE%20FB%20Publications/note">http://www.casc.eu/media/CWE%20FB%20Publications/note</a> NEX BEX V1.pdf

#### **Requested publication of LT Nominations**

• Long Term nominations themselves are not published as such today but can be inferred from the comparison of daily NTCs and ATCs, available on CASC website for all CWE borders.

Following MPs request, the Project will investigate whether LTN can be published per se in a centralized way for the CWE region.

# General MPs' feedback on transparency

- MPs requested additional information on Remedial Actions as for example a categorization of those. The project explained
  that this information cannot be provided as they could not reflect the human factor. Indeed, the application of Remedial
  Actions can be formalized until a certain point, but cannot capture the operators' experience in applying them in specific
  circumstances.
- MPs mentioned that the publication of the reference flow, Fref (flow on a CB resulting from exchanges in the base case) could be considered, as it would allow an easy display of the FB domain. However, MPs will first further discuss the usability of such a publication and provide the project with a more detailed justification.
- MPP stated that as the question of full transparency is important and should not be prevented by legal issues, this point should be discussed openly with MPs

<u>Project Answer</u>: There is no real legal issue but there are risks in terms of extensive publication, at least theoretical ones which need to be mentioned. The project confirms that the current foreseen publication is legally compliant and even exceeds the current transparency obligations.

### 3 Intuitiveness

#### **UIOSI** principle

Project Partners informed MPs about the publication of an explanatory note of the "Use It Or Sell It » compensation
mechanism on CASC's website: <a href="http://www.casc.eu/media/CWE%20FB%20Publications/Explanatory%20note%20UIOSI.pdf">http://www.casc.eu/media/CWE%20FB%20Publications/Explanatory%20note%20UIOSI.pdf</a>
explaining that the choice of FB or FBI will not have an impact on MPs as they are not expected to pay out the negative spread.

# Further MP feedback on FB vs FBI

- Following the bilateral discussion on transparency no clear preference on MPs' side for the implementation of FB and FBI could be observed.
- Project Partners raised the question again as the project is expected to formulate a recommendation in the approval package for NRAs until May, 9<sup>th</sup>.
- Independent of the chosen solution, the other alternative will be monitored and at least provided to NRAs after go-live. Following inquiry by MPs, the Project states that for the time being, it is not foreseen that these results will be shared with MPs

The Project will however internally discuss this point and provide MPs with feedback.

- MPs' preference towards FB or FBI is still not fully unambiguous. MPs again express concerns towards the gain in social welfare with FB MC following reduction of welfare in the last results and the impact on intraday and forward markets.
- In general, the solution with the highest social welfare, namely standard FB should be favored. However, from a trading
  perspective, the implementation of FB plain is more difficult to justify as flows can go from a high price to a low price area.
  This non-intuitive behavior might be difficult to explain to the general public and therefore raise political concerns
  regarding the acceptability of such adverse flows. For political reasons, FBI therefore seems to be the most acceptable
  choice.

The Project will take into consideration MPs arguments while proposing a recommendation in the approval package.

# 4 Public consultation and market forum

# Organization of public consultation

- NRAs intend to organize a public consultation in order to check MPs' confidence and readiness for FB after sufficient stable
  daily parallel run results in June. The official timing of the consultation will be confirmed by NRAs in May.
- The public consultation is an important milestone as it is a legal national obligation for NRAs to check MPs' readiness for Go Live. The outcome of the consultation will also be taken into account by the project in form of addenda to the NRA approval package.
- The project invites MPs to provide the project with potential suggestions or improvements, if any, for the organization of the public consultation.

#### **Organization of Market Forum**

• At the beginning of the public consultation, Project Partners foresee to organize a market forum in order to provide additional explanations on the updated approval package and to answer potential questions on the last parallel run results. The foreseen date and location for the Market Forum is June, 6<sup>th</sup> in Berlin. A 'save the date' will be communicated shortly.

# 5 AOB

A FBUG Call will be organized before the public consultation around end of April or beginning of May in order to share the
project's investigations on the abovementioned points with a dedicated focus on transparency.