Metodeanmeldelse vedrørende Energinet.dk's evaluering af fysiske transmissionsrettigheder (PTR) på den elektriske Storebæltsforbindelse og Metodeanmeldelse vedrørende indførsel af Harmonised Allocation Rules med regionsspecifikt bilag 7

Svenska kraftnät has been given the opportunity to comment on the two hearings organised by the Danish Energy Regulatory Authority (DERA) regarding their decisions on long term transmission rights in Denmark.

Svenska kraftnät wish for Energinet.dk not to allocate PTR on the Great Belt interconnector. Svenska kraftnät considers PTR to be contradictory to the Nordic market design, since the character of PTR allows for physical transmission capacity to be withdrawn from the wholesale market to be used by the owner of the PTR. Long term hedging in the Nordic electricity market should be designed in a way that is as efficient as possible and without hampering the foundation of the Nordic market design.

Svenska kraftnät believes that the time period evaluated, approximately one year, is not sufficient to see the full effects of the introduction of transmission rights in the Danish and Nordic market. Long term consequences in the form of negative effects on the Nordic forward contracts, system price and Electricity Price Area Differentials (EPAD) cannot be dismissed. Svenska kraftnät identifies the risk that transmission rights in a longer perspective destroy the EPAD market, leaving market participants more limited in their options to hedge against the price risk.

Additionally, the design of long term transmission rights is benefiting larger market participants over smaller participants and the transmission rights are at risk to be used with the purpose of speculation rather than of hedging.
Svenska kraftnät is of the opinion that positive effects on the long term hedging market should be achieved without negative consequences to other parts of the Nordic market design.

Svenska kraftnät is positive to the development and introduction of a common set of rules for transmission rights. Svenska kraftnät therefore values the introduction of the HAR for the transmission rights allocated on the Danish borders.

Svenska kraftnät

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