



Legislative suggestions of the EnCS on stimulating RES Karali Katerina

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Round Table Discussion

The Winter Package (1 out of 2)



 EnCS considers the Winter Package the sustainable solution/ way out for RES integration into the electricity markets

- Winter Package targets:
 - □ increase investor certainty
 - working towards sustainable climate and energy targets
- RES support schemes to be granted in a competitive manner (auctioning)
- Guidelines on state aid for environmental protection and energy need to be properly observed when establishing new RES support schemes



Round Table Discussion

The Winter Package (2 out of 2)



- One stop shop for permitting and licensing procedures
- Simplified procedures for connection to DSO networks especially for the small scale RES
- ✓ RES prosumers treated differently than suppliers
- ✓ Market-orientated and cost-effective RES
 - How to introduce RES into the market design without creating non-bearable risks to investors



Auctioning – the EnCS approach



Different types/ multiple options

- / The auctioning design is a science in its self
- Revealing the most cost efficient price for the support scheme
- Pay as bid is the preffered pricing method
- Selection and financial criteria
- Auctions have the maximum added value when they are performed later in time i.e when the process is already mature enough
- EnCS aims at proposing a common regulatory framework (guidelines) in the EnC area targeting the RES auctoning process



State Aid Guidelines and accosiated risks



Support schemes should progressively phase out

- Where Intra-day markets exist, even those RES enjoying priority dispatch and support, should start bearing imbalance costs
 - Undertake the cost that forecast errors bring into the systems
 - Utilise Intra-Day Market to hedge the exposure related to forecast errors

Can investors deal with that risk?

- ✓ In mature markets, definately yes
- In markets where no history exists on imbalance volumes and corresponding price exposure the risk should be progressively addressed –training phase

The new Electricity Market Law in Ukraine fully rerspects the above State Aid provisions



Market oriented and cost effective RES



- Priority Dispatch to stay until 15% penetration on installed capacity is achieved
- Then priority dispatch should be eliminated (it remains for existing projects and the small ones)
- RES should bid into the spot markets and be dispatched if competitive
- ✓ Price takers combined with simple FiP support scheme
 - \checkmark The distortion is not resolved
 - \checkmark The prices in the spot market will be driven to lower levels
 - If support is granted on top of the market price then RES have no incentive to stop this destorting process
- RES to be integrated in a way that will incentivise them to set the market price



Support not directly connected to energy markets



Capacity mechanisms /markets

- ✓ Winter Package –coal is ruled out
 - generation capacity existing or in construction only if its emissions are below 550 grams of CO2 per k

✓ Is capacity mechanisms/markets the way out for RES?

- RES could be part of this support (still way to go but technology is progressing)
- Capacity mechanisms, if not well designed, are destorting the energy spot markets
- But, if the problem is created, will not be technology specific



How RES are integrated in the New Market Rules for Ukraine



- ✓ Existing RES enjoy priority support under the FiT
- ✓ Existing RES will not face imbalance costs
- New RES under support schemes will face imbalance costs from the day the IDM starts operating and this will be progressively and smoothly allocated to them
- The New Market Rules were drafted to fully integrate RES projects into the wholesale level for whenever there will be a decision to phase out support connected to the energy market
- ✓ The software to be procured should foresee their future merchant participation



Integration can be achieved-bankability?



- ✓ Integration can be achieved
- ✓ Would investors then be willing to take the risk?
- ✓ Would the projects be bankable?
- ✓ There is no risk free business in the modern economy
- ✓ Bankers will go ahead if the risk can be assessed
 - Risk free business (guaranteed long term PPAs) could eventually become boomerang
- ✓ The associated market is a well designed market:
 - ✓ true, non distorted, prices are revealed
 - ✓ well monitored and guarded by the regulator
 - ✓ its statistics create confidence



Round Table Discussions







Legal Energy Day