

Financial Transmission Rights

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- Obstacles to the Single Electricity Market
 - Lack of price convergence
 - Market power
 - Lack of interconnection
- Solutions
 - Market coupling
 - More investment and

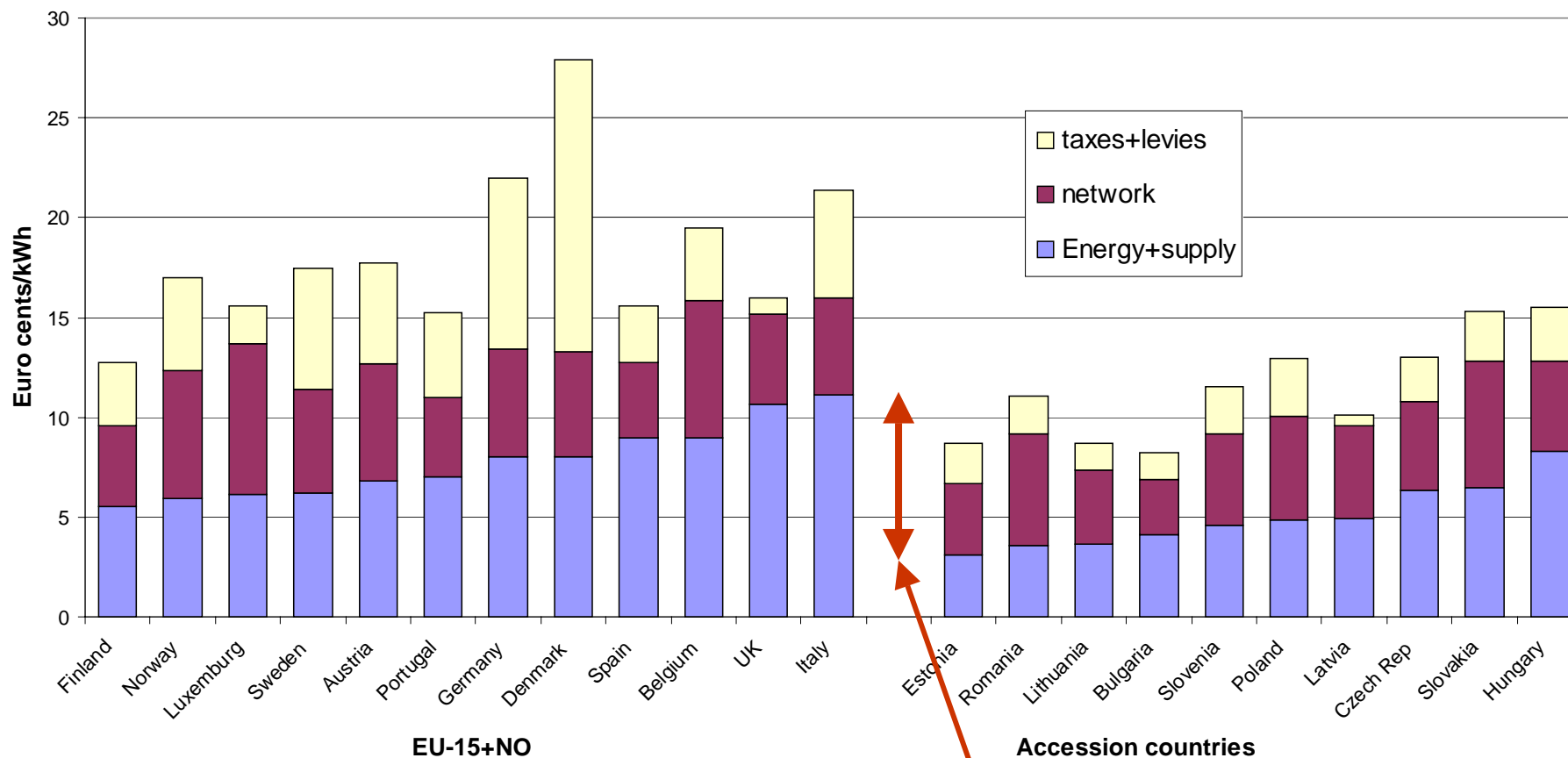
Firm FTRs: our study for DG-ENER



- Deliver **secure sustainable** electricity **efficiently**
⇒ competitive markets, full use of ICs (inter-connectors), efficient & timely T & G investment
⇒ But most markets becoming **more concentrated**
- => unbundle transmission **ownership**
- Target Electricity Model couples markets
 - Provides liquid reference price
- Competition aided by **long-term FTR obligations**
 - Can be netted to increase effective contestability
 - Price discovery guides transmission investment

No single energy price in the SEM

Domestic electricity prices 2008



Source: ERGEG (2009) Status Review

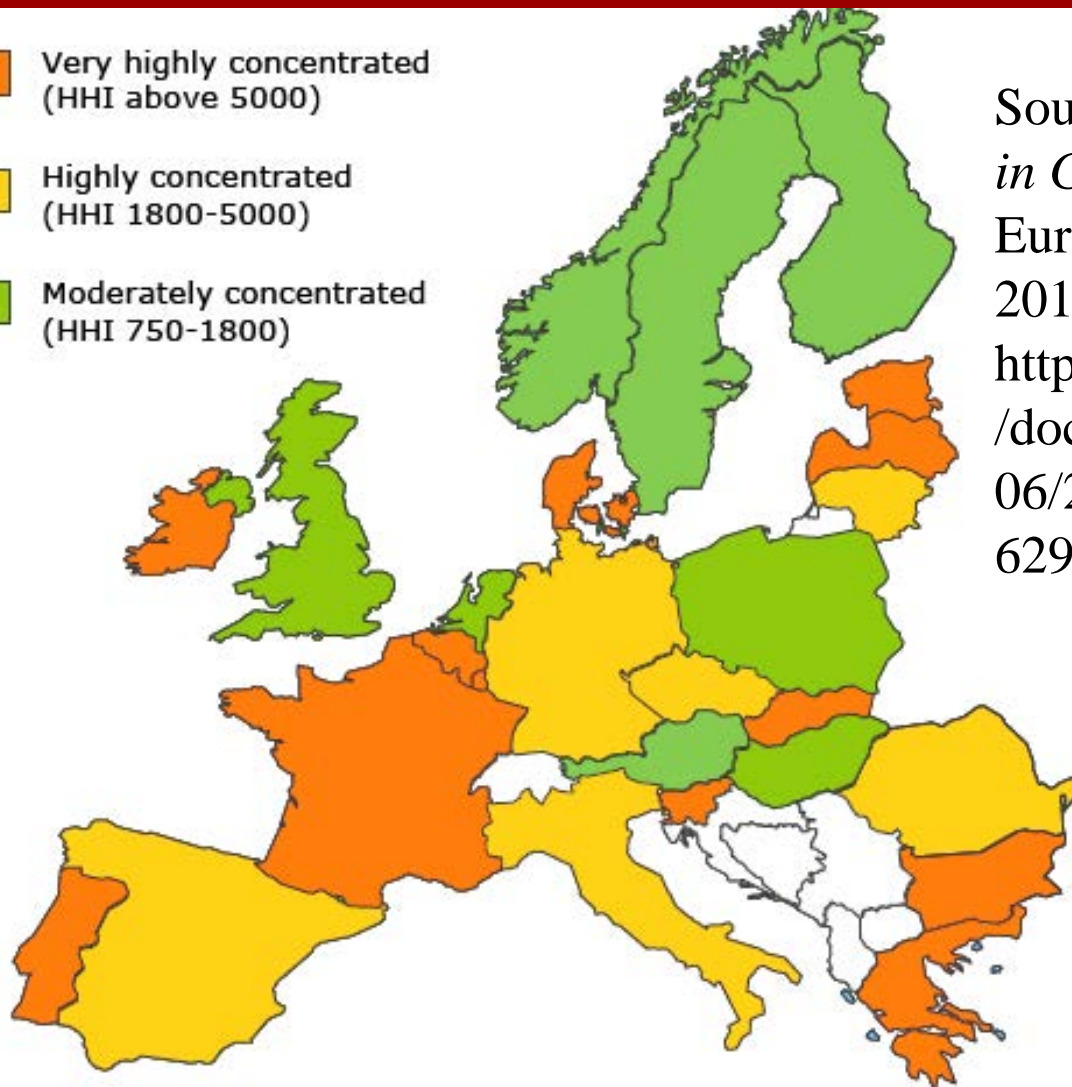
3:1 variation in energy price

- Most markets are concentrated
- Imports can increase competition
- But interconnections limit trade
 - were inefficiently used
 - expansion resisted by incumbents
- Market coupling improves efficiency
- FTR obligations makes markets contestable

Together clarify where T investment needed

10 countries increased concentration in 2008

- Very highly concentrated (HHI above 5000)
- Highly concentrated (HHI 1800-5000)
- Moderately concentrated (HHI 750-1800)

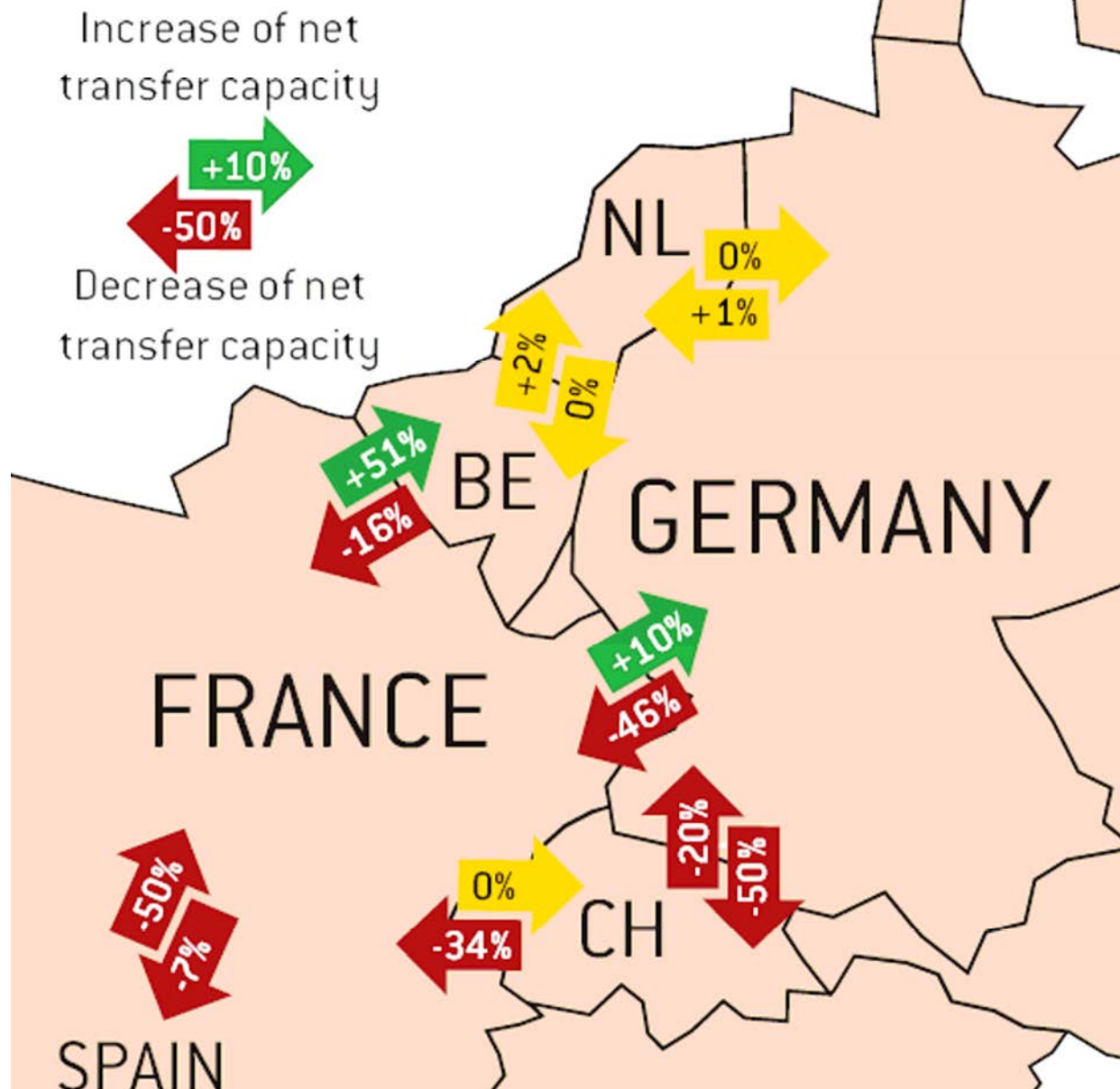


Source: *EU Energy Markets in Gas and Electricity*, European Parliament

2010 at

<http://www.europarl.europa.eu/document/activities/cont/201106/20110629ATT22899/20110629ATT22899EN.pdf>

Decreasing transmission capacity jeopardises the single market

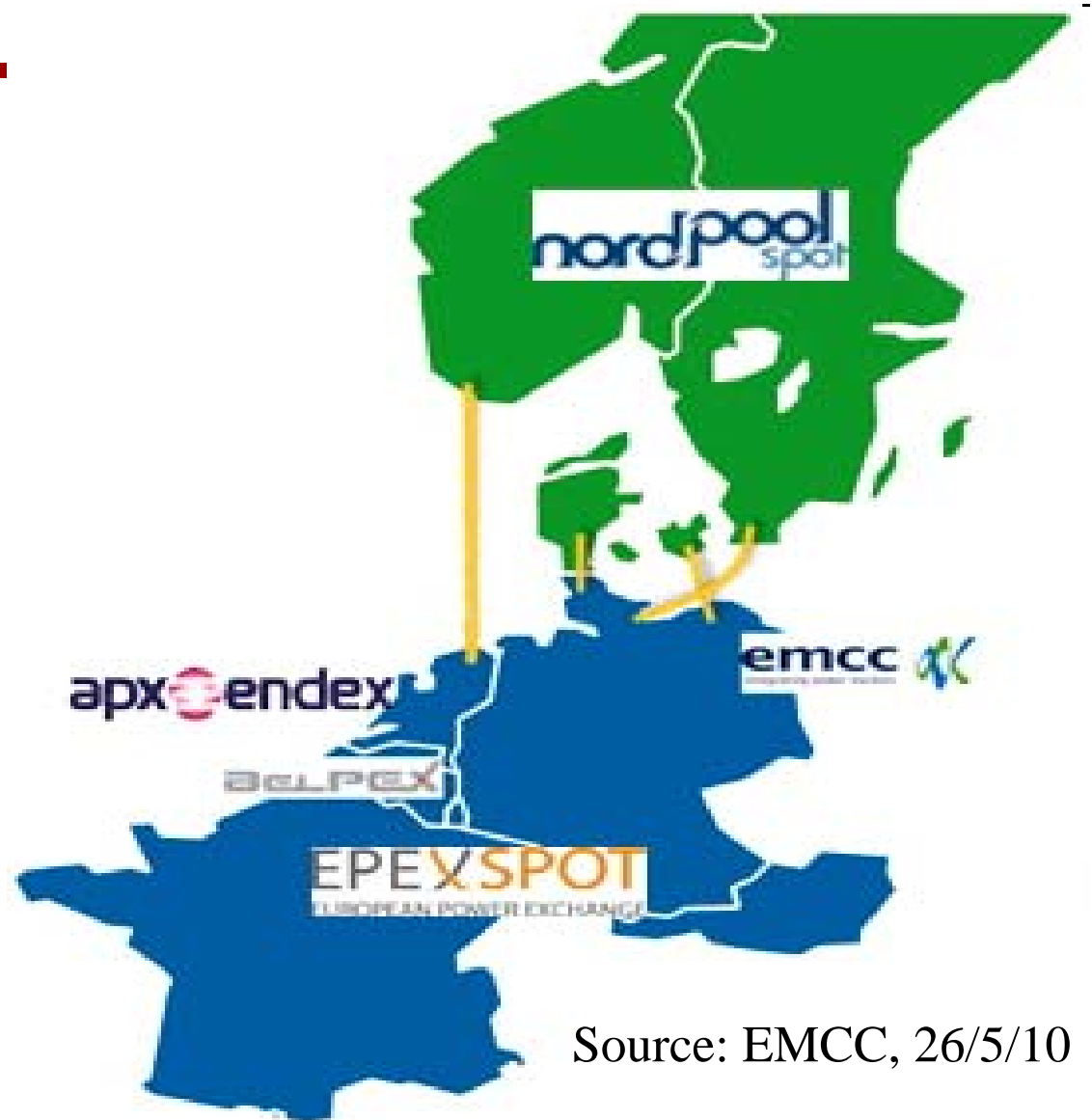


Change in net transfer capacities between winter 2004/05 and winter 2009/10
- mostly decreases

Source: Zachman (2010) from ENTSO-E. Figure shows change in net transfer capacities between winter 2004/05 and winter 2009/10 in direction of arrow

Market coupling

- Market coupling makes efficient use of interconnectors
- Markets are cleared at a single price over largest area
- Transmission constraints determine price zones
- 9 Nov 2010 Central West Europe moves to Interim Tight Volume Coupling

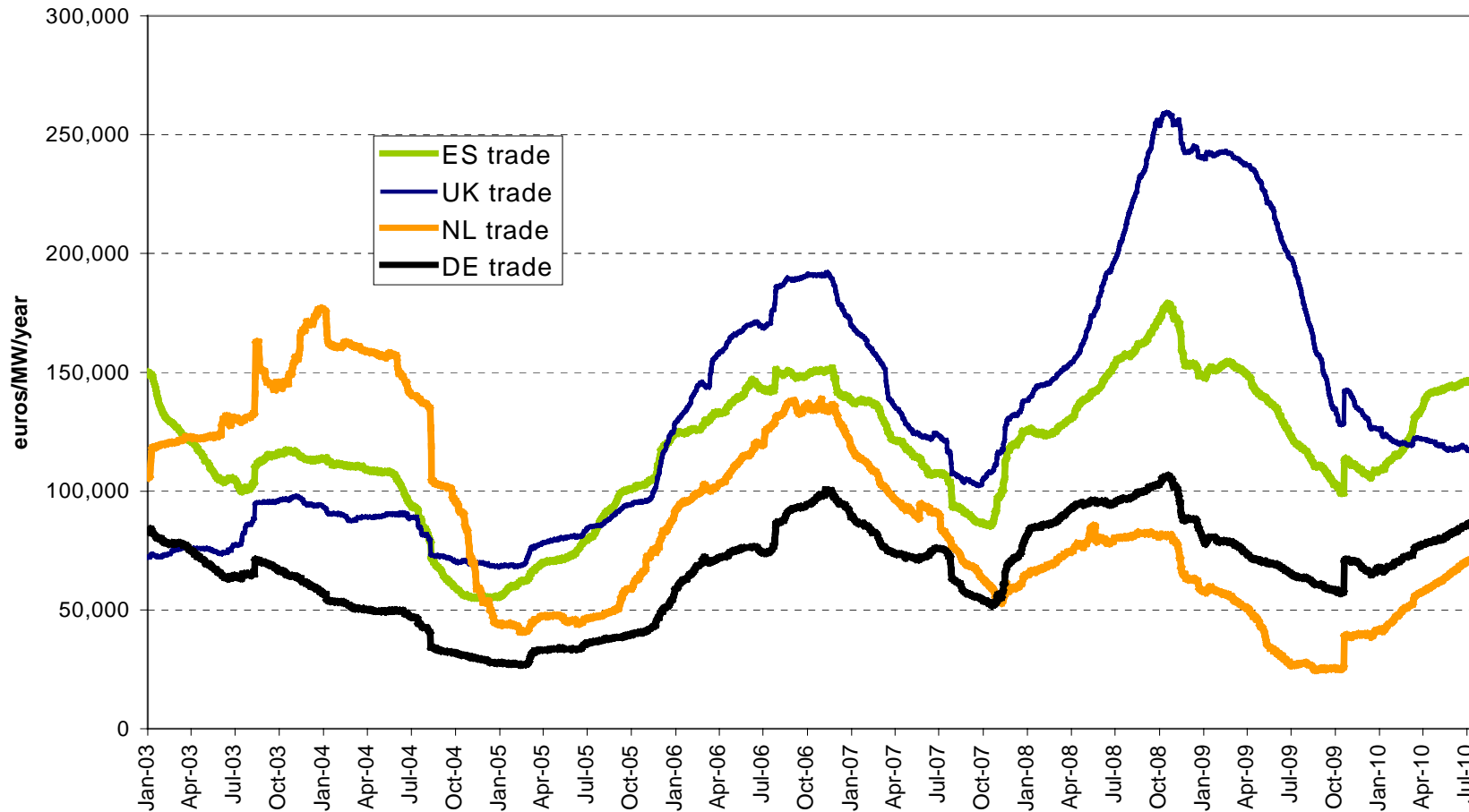


Source: EMCC, 26/5/10



Absolute hourly difference relative to France 2005-10

Annual value of trade between France and other countries



- DG-ENER commissioned Booz&Co for study
 - *Physical and Financial Capacity Rights for Cross-Border Trade* by David Newbery and Goran Strbac
 - Contributes to 3rd Package Target Electricity Model
- Consulted with ENTSO-E; CEER/ ERGEG/ ACER; CEFIC; Euroelectric; EFET; IFIEC
- Presented to Northern European Regional TSO meeting and Florence Forum (interim & final)

- Identify **advantages and disadvantages** of tradability of long-term Transmission Rights
- Should rights be **financial transmission rights** (FTRs) or **physical transmission rights** (PTRs), (or variants/hybrids);
- Propose **practical recommendations**, including the **preconditions necessary, for a facilitating a market in the rights**
 - which will meet the needs of participants, and deliver efficient and reliable long-term price signals

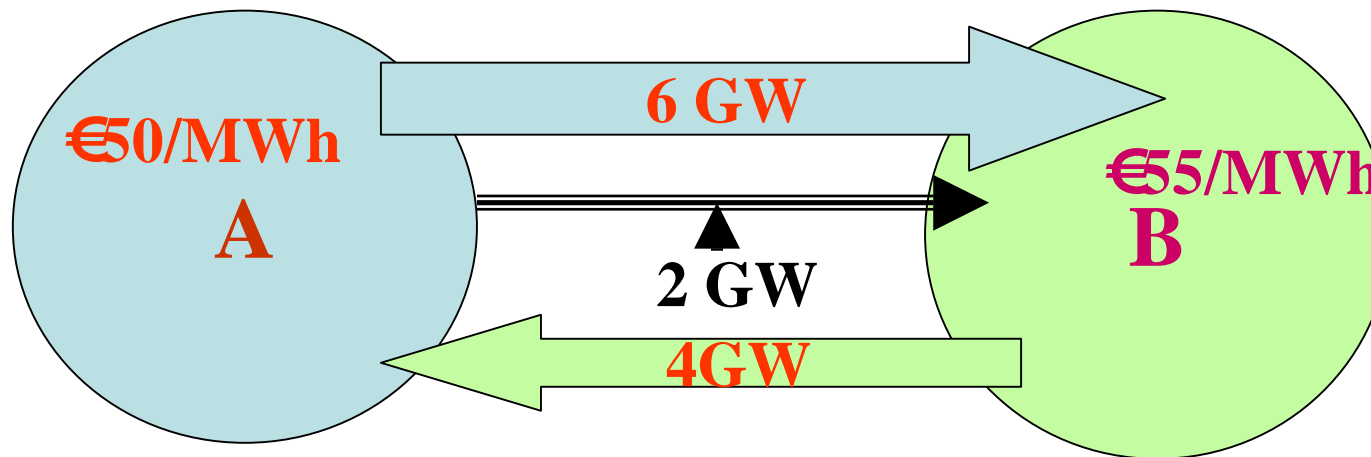
- TSOs offer 1 yr PTRs (one-sided options)
 - Use it (nominate) or sell it (UIOSI) day-ahead
 - Sale transforms PTR into financial instrument
 - Effectively becomes an FTR day-ahead
- TSOs and incumbents like PTRs - “reflects physical reality”
 - one-sided options restrict trade as cannot be netted
 - **protect incumbents, impedes competition**

- Promotes **efficiency** in the use of interconnectors (ICs)
- Promotes generation **competition** across borders
- Tends to **mitigate market power** in generation
- Price differences identify required IC **investment**
- Allocates **risk** efficiently to TSOs and rewards them appropriately
- Accommodates **intermittent** generation



Firm FTRs allow netting

- 2 GW interconnector between countries A & B
- FTRs obligations trade at €5



Netting can dramatically increase imported competition

FTR obligations increase competition

- Consider an IC ATC = 2 GW connecting two concentrated markets, A, B (peak L = 20 GW)
- Large Industrial Consumers (LIC) demand = 8 GW
 - PTRs only release 1 GW in each direction
 - 87% of market dominated by incumbent G
- **Now SO issues 2 GW FTR *obligations* each way**
 - Initially LICs buy 2 GW A→B, G_B loses 2 GW custom, sells to A, FTR of 2 GW B→A nets to zero; SO continues to issue FTRs subject to net value of 2 GW
- Generators in each country vulnerable to competition from abroad *for any customer in their market*



- All US nodal markets offer long-term **FTR obligations**: market participants happy
 - PJM and CAISO offer FTR options (for Merchant Transmission projects)
 - **Market demand for FTR options < 1%**
 - Many ISOs have looked at issuing FTR options
 - Reluctant to issue/administer FTR options market because of challenge in designing a set of options while ensuring TSO revenue adequacy
 - Hard to price FTR options => concerns about liquidity of secondary markets
 - nothing stops traders issuing them
- => Offer FTR options and obligations if market demands

- Target Electricity Model has zonal not nodal prices
- FTRs are from zone-to-zone
- But flows depend on which **nodes** inject and withdraw
=> ATC depends on which nodal flows, so **market condition dependent**
=> TSOs provide nodal load flow data to maximize day-ahead ATCs
- **Simultaneous Feasibility Test: ATC does not depend on market conditions**



Simultaneous Feasibility Test (SFT)

- SFT needed to maximise ATC
 - ⇒ Represent all FTRs in network model + all external loop flows
 - ⇒ Solve for network flows pre- and post-contingency states
- guarantees if all FTRs exercised to support IC transfers then no constraint or ATC exceeded
- Provided topology unchanged, TSO congestion ***revenues will be “adequate”***
 - to settle all FTRs



- Subsea links face higher and longer outage risks
 - => Firm contracts could rapidly bankrupt owner
 - => Should be permitted to offer interruptible service
 - guaranteeing firm service likely needs a large insurance premium provided by asset-adequate insurance firm
- If NRAs impose new conditions on merchants
 - Merchants should retain existing property rights
 - Can negotiate compensation for less favourable terms
- EC/ACER consider merchant regulation carefully
 - Currently discourages new merchant links when more ICs needed

- TSOs prefer 1 yr PTRs not 3+ yr FTRs
 - Defending incumbents from competition?
- ⇒ NRAs need to take tougher line
- ⇒ **no discrimination** - treat domestic and external access alike
- MiFID subjects TSOs to financial regulation?
 - But NRAs better regulators
 - SFT ensures revenue adequacy
 - but NRAs must assure compensation for *force majeure*

- **Firm** long-term TRs are desirable
 - TSOs need regulatory assurance to recoup losses
 - within country transmission is firm - **need EU non-discrimination**
 - Only undersea & merchant IC's should be **exempt** from firmness
- **Anything PTRs can do FTRs can do better**
- FTR obligations increase competition and efficiency
 - netting allows more competitors into each market
 - but zonal pricing is an impediment to full market integration
 - Inter-zonal ATC calculation is **market-condition dependent**
 - does not respect the physics (loop flows, internal congestion)
 - => under-declaration and inefficient use of capacity

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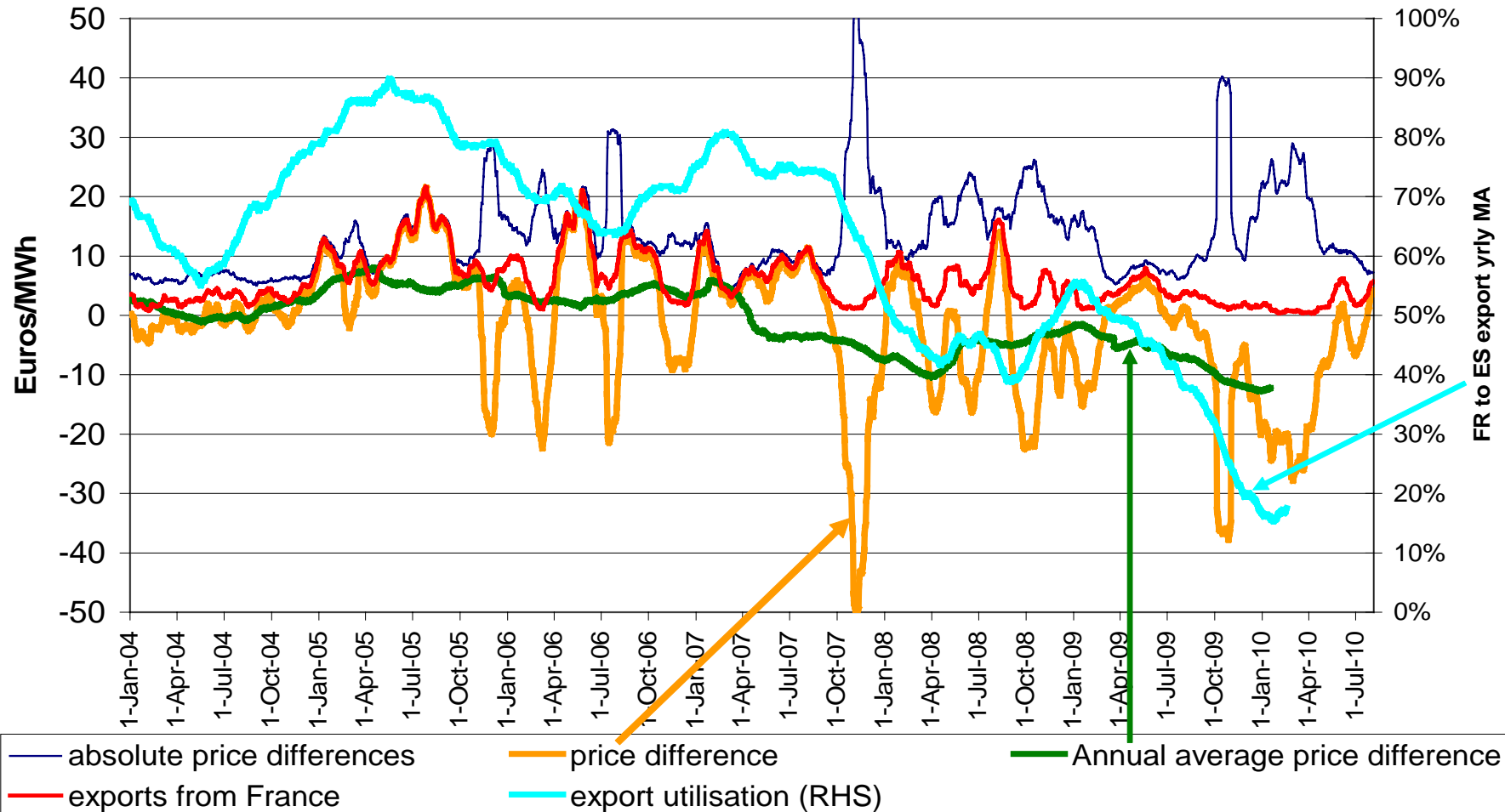
Appendix

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Price differences, Spain-France

monthly moving averages of hourly differences



Trading example: Spain – France in 2006

- 1 yr base contract €50.65/MWh in Spain; €48.13 in France
- But PTR FR→ES worth €8.49/MWh (value of exports only)
 - does this mean L_S cannot bid for PTR when $E p_F - E p_S = €2.52/\text{MWh}$?
- **No: not if LIC actively trades**
 - G_F has MC €30/MWh, contract to sell to L_S who holds PTR at €48.13/MWh
 - 19 July 2006: $p_F = €116.83/\text{MWh}$, $p_S = €55.30/\text{MWh}$, $p_F - p_S = €61.53/\text{MWh}$
 - L_S sells into FR market, profit = $€116.83 - 48.13/\text{MWh} = €67.87/\text{MWh}$, releases PTR (value = 0), having paid €8.49/MWh, buys in ES at €55.30/MWh rather than at contract of €48.13/MWh, loss of (€7.17)/MWh,
 - net gain = $€67.87 - €7.17 - €8.49 = €52.21/\text{MWh}$ on this day
- same as L_S holding Spanish CfD for €48.13/MWh and one-sided FTR FR→ES for €8.49/MWh



Contracting *within* a price zone (all prices /MWh)

- Generator G has variable cost €30, sells to L at €40, issues L 2-sided CfD with strike price $P = €40$
- G offers into PX at €30, L bids at limit price e.g. €9,999
- Spot $P = €25$, G does not generate, L buys at €25, L pays G $€40 - 25 = €15$ on CfD, G makes profit of €15 > strike price less MC = €10
- Spot price = €50, G generates, sells at €50, L buys at €50, G pays L $€50 - 40 = €10$ on CfD (can afford to), reducing G's sales revenue to €40 = strike price. Profit = €10
- **Credit risk: L defaults on CfD (contract stranded)**



Contracting *across* price zones: FTRs (all prices /MWh)

- Generator G in A MC= €30, sells to L in B at €40, issues L 2-sided CfD with strike $P = €40$, buys FTR A=>B for €5
- G offers into PX at €30, L bids at limit price e.g. €9,999
- $P_A = €25$, G does not generate, $P_B = €35$; L buys at €35, L pays G €40-35= €5 on CfD, G collects €35- €25 = €10 on FTR, makes generating profit of €15 > strike price less MC = €10 (less FTR €5)
- $P_A = €50$, G generates, sells at €50, $P_B = €45$, L buys at €45, G pays L €45-40= €5 on CfD, G pays €5 on FTR, G's revenue to €50—5-5=40 = strike price. Profit = €10 (less FTR €5)

Credit risks: buyer defaults on CfD

- ATC: available transfer capacity
- CfD Contract for Difference
- FTR financial transmission right
- HHI: Herfindahl–Hirschman Index (measure of concentration)
- IC: interconnector
- ISO Independent System Operator
- MC Marginal cost
- MiFID Markets in Financial Instruments Directive 2004/39/EC
- NRA: National Regulatory Agency/Authority
- PTR: physical transmission right
- PX Power exchange
- SEM Single (or integrated) electricity market
- SFT: Simultaneous Feasibility Test
- TEM: Target Electricity Model
- TSO Transmission System Operator