

Stakeholders' comment		Baltic TSOs' Comment
In overall, do you agree with the two-step approach for full 15 minute ISP implementation as proposed by the TSOs incl. characteristics for each market level and its underlying step thereof?		
1	Should be just one step approach for full implementation without uncertainty when it will be implemented.	Full implementation of ISP15 (15 min. imbalance prices, 15 min. ACE balancing by TSOs) is not possible until 2025. Thus, the concept suggests 2-milestone ISP15 implementation approach by making gradual changes (milestones) till full implementation.
2	The TSO proposal should stick to TSO scope, i.e. Intraday and Dayahead are out of scope. Having an intraday or day-ahead market with 15-min products is not a prerequisite to 15-min Imbalance settlement periods. It is a consequence.	DA (Day ahead) and ID (Intraday) markets are left in the 15 min. ISP concept document for information since they are closely related to 15 min. ISP business processes.
3	Definitions of steps 1 and 2 are unclear. What is the difference between "15-min ISP implementation for balancing market purposes" in step 1, and 2 15-min ISP implementation with additional balancing market products" in step 2?" Instead of implementing 2 steps where the 1st one is only partial, it would be easier for the market to adapt at once when all the area ISP is in 15min. Step 1 is not bringing added value.	The main drivers for the introduction of the 15 min. ISP in a two-milestone approach is to establish a connection with the MARI platform without any foreseeable delays, and to establish 15 min. ISP data exchange capability on TSO-TSO, TSO-BRP and TSO-DSO business process levels by 2022 Q4. Milestone 1 allows DSOs (Distribution System Operator), BRPs (Balance Responsible Party) and BSPs (Balance Responsible Party) timely prepare and get used to: 1) Data exchange procedures with 15 min. data resolution; 2) Forecasting electricity consumption and production with 15 min. resolution; 3) Potential trade with 15 min. ID products; 4) 15 min. Balancing products for BSPs. By 2024 Q4, Baltic TSOs foresee: 1. 15 min. metering data from DSOs according to national rules and regulation; 2. The introduction of additional balancing market products based on the automatic frequency restoration reserve (aFRR) along with preparations for Baltics to join the Platform for the International Coordination of Automated Frequency Restoration and Stable System Operation (PICASSO); 3. The establishment of 15 min. TSO balance control; 4. The calculation of imbalance prices for each respective 15 min. ISP.
4	Currently we do not see enough benefits in implementing 15 minute ISP from 2020, therefore we ask to delay this till 2025.	
5	Acceptable, but timeline in general should be synced with Nordic TSO's.	According to the updated Nordic Balancing Model (NBM) concept document roadmap, Nordic TSOs foresee the introduction of 15 min. ISP along with the go-live of 15 min. ID market by 2023 Q2. The Baltic TSOs are of the opinion that a 100% alignment with the Nordic roadmap is not a requirement on its own taking into account uncertainties (whether low, medium or high) on implementation in Nordics could postpone the goal set by the Baltic TSOs.
6	Baltic market is closely integrated with Nordics and in order to reach target of Commission Regulation (EU) 2017/2195 of 23 November 2017, Baltic sites should harmonize its 15 minute ISP implementation roadmap with Nordics;	
7	Timeline for Step 1 is not acceptable because the process must be aligned with the Nordic approach. According to current information the deadline for full implementation of 15 min ISP in the Nordics will be Q4 2022. Hence, Step 1 deadline must be the same - Q4 2022.	

8	Considering the level of market integration with Nordics, volumes of Nordic balancing energy trading and intraday trading, as well as the clear signals from Nordic TSOs about the delays of 15 min ISP implementation, we strongly suggest to ask for a derogation and implement the 15 min ISP and intraday products synchronous with Nordic TSOs.	
9	DSO costs for electricity might increase due to network losses which will become harder to predict for shorter intervals.	Adjustments to forecasting tools and making use of available trading products in the DA and ID market are key factors that should help market participants mitigate against excessive costs.
10	A thorough cost-benefit analysis must be conducted before approval of the roadmap for the 15 minute ISP implementation in order to estimate needed investments for the transition and ensure costs to society (e.g. tariff) will not be increased due to it;	The TSOs are bound by EBGL to implement 15 min. ISP and the regulation doesn't require to conduct cost-benefit analysis before implementation of 15 min. ISP. Nevertheless, according to article 53(3) of the EBGL Regulation, the relevant NRAs, in cooperation with the Agency, shall perform a cost-benefit analysis at least once every three years.

Stakeholders' comment		Baltic TSOs' Comment	
Do you agree with the Baltic TSOs proposals and way forward in relation to the day-ahead market?			
1	If the day-ahead market remains as it is right now, how the purchased quantities will be divided into 15-minute periods?	Until there are no 15 min. ID and DA products, BRPs are allowed to divide bought volumes freely. Most basic division would be that to divide the bought energy volume into 4 equal parts for each 15 min. ISP.	
2	Implementation of 15 minute imbalance settlement period without implementation of 15 minute Day Ahead market does not seem reasonable as the Balance responsible party will not be able to perform appropriate planning for 15 minute period for respective portfolios. Eventually the planning for the portfolio for an hour will be X while equivalent of 15 minutes will be x/4. Partially the issue is being solved with single hour balancing price, but the question arises how will the balancing price be determined in case of huge imbalance within an hour, like from 8:00 – 9:00 when it is possible to be with positive balance and negative within the same hour.	Article 8 of the Commission regulation (EU) 2019/943 of 5th June 2019 on internal market for electricity, establishes that NEMOs shall provide market participants with the opportunity to trade in energy in time intervals at least as short as the ISP in both DA and ID markets. With regard to the DA and ID market coupling mechanism, the Single ID Coupling (SIDC) mechanism already supports trade in 15 min. products. The Single DA Coupling (SDAC) mechanism, however, does not. Once a centralized European solution for trading DA products with 15 min. resolution is ready, gradual roll-out of the solution shall begin. For the time being, Baltic TSOs foresee that by milestone 1, the possibility along with the capability of trading with at least with 15 min. products on the ID market should be available for Baltic market participants. Baltic TSOs shall ask NEMOs to introduce additional 15 min. market time unit and products on all Baltic CCR cross borders for ID trade between bidding zones.	
3	However, the resolution of product of Intraday market should be the same size as Day ahead product resolution.	With regard to the balancing price and imbalance price calculation, Baltic TSOs shall carry out a separate public consultation on the updated Baltic balancing market rules (incl. standard product) and imbalance settlement model during Q3 of 2020 applicable for milestone 1. An additional public consultation on both balancing market rules and imbalance price calculation, applicable for milestone 2, shall be organized during Q4 of 2022	
4	Any proposition to this respect should be done by NEMOs.		
5	Day-ahead market products are responsibility of NEMOs. Shouldn't be part of TSOs consultation document.		
6	nominated electricity market operators shall provide market participants with the opportunity to trade in energy in time intervals at least as short as the imbalance settlement period in both day-ahead and intraday markets		
7	Imbalance planning is forbidden, therefore the day-ahead product resolution period must be exactly the same as balancing period.		
8	Nominated electricity market operators shall provide market participants with the opportunity to trade in energy in time intervals at least as short as the imbalance settlement period in both day-ahead and intraday markets.		
9	There should be as much harmonization with the Nordic model timeline as possible.		According to the updated Nordic Balancing Model (NBM) concept document roadmap, Nordic TSOs foresee the introduction of 15 min. ISP along with the go-live of 15 min. ID market by 2023 Q2. The Baltic TSOs are of the opinion that a 100% alignment with the Nordic roadmap is not a requirement on its own taking into account uncertainties (whether low, medium or high) on implementation in Nordics could postpone the goal set by the Baltic TSOs.

Stakeholders' comment		Baltic TSOs' Comment
Do you agree with the Baltic TSOs way forward in relation to intraday market product and BRP scheduling GCT for step 1?		
1	GCT should be 30 minutes before ISP.	15 min. ISP updated document proposes 25 min. GCT for ID products in milestone 1. 25 min. GCT of BRP scheduling is limited by to European Balancing market design.
2	We propose to have GCT 30 minutes before ISP as soon as possible for all borders.	
3	GCT should be as close to delivery as possible.	
4	Intraday GCT 30 minutes before ISP for ALL borders must be implemented already in Step 1, in accordance with the Nordic process.	
5	What is the reason Estonia still has 60 min resolution in Step 1 and Step 2 for BRP Scheduling?	In Estonian scheduling area, Elering shall support the submission of DA balance plans with both 15 min. and 60 min. resolution. In case of the latter, the TSO will divide the plan into four 15 min. resolution on behalf of the BRP.
6	Not clear, how the existing 60 minute resolution will be divided in 15 minutes. Does it mean that the BRP schedule will include 96 rows?	In Latvian and Lithuanian scheduling area, the existing 60 min. schedule should be divided into four 15 min. ISPs. Therefore - 96 rows. In Estonian scheduling area, Elering shall support the submission of DA balance plans with both 15 min. and 60 min. resolution. In case of the latter, the TSO will divide the plan into four 15 min. resolution on behalf of the BRP.
7	What are the existing 60 min Intra-day products after Step 2?	Market participants would have the possibility to trade 60 min. resolution products on DA if they'd wish to.
8	Any proposition with respect to intraday market should be done by NEMOs. As for BSP scheduling, it should be in 15-min in all areas as from step 1. While NEMO favours GCT closer to real time, it is not a requirement for 15-min ISP.	According to article 8 of the Commission regulation (EU) 2019/943 of 5th June 2019 on internal market for electricity, establishes that NEMOs shall provide market participants with the opportunity to trade in energy in time intervals at least as short as the ISP in both DA and ID markets. Therefore, NEMOs are the ones to implement 15 min. MTU in DA and ID market and in 15 min. ISP concept document Baltic TSOs proposes for NEMOs to introduce the 15 min. ID and DA products in Baltic areas in order to follow EBGL and regulation on internal markets for electricity ID and DA products resolution reduction will be done together with relevant capacity calculation amendments.
9	Nominated electricity market operators shall provide market participants with the opportunity to trade in energy in time intervals at least as short as the imbalance settlement period in both day-ahead and intraday markets;	
10	By implementing the 15 minute intraday market time unit, relevant changes should be made to the Capacity calculation processes within the Baltic Capacity Calculation Region (CCR) in order to calculate and allocate cross zonal capacities for intraday markets with 15 minute product resolution.	
11	Considering the level of market integration with Nordics, volumes of Nordic balancing energy trading and intraday trading, as well as the clear signals from Nordic TSOs about the delays of 15 min ISP implementation, we strongly suggest to ask for a derogation and implement the 15 min ISP and intraday products synchronous with Nordic TSOs.	
12	Settlement for BSP's: 15 min resolution cannot start from Step 1 if the schedule is not synced with the Nordic schedule.	According to the updated Nordic Balancing Model (NBM) concept document roadmap, Nordic TSOs foresee the introduction of 15 min. ISP along with the go-live of 15 min. ID market by 2023 Q2. The Baltic TSOs are of the opinion that a 100% alignment with the Nordic roadmap is not a requirement on its own taking into account uncertainties (whether low, medium or high) on implementation in Nordics could postpone the goal set by the Baltic TSOs.
13	Settlement for BSP's and Settlement for BRP's: Should be synced with the Nordic plan.	
14	Balancing market (mFRR) Step1: We prefer there would be 15 minute pricing, instead of 60 min pricing.	

Stakeholders' comment		Baltic TSOs' Comment
Do you agree with the Baltic TSOs proposals for introduction of 15 minute intraday market time unit and products?		
1	15 minute product start should be delayed till 2025.	Full implementation of 15 min. ISP is foreseen until 2024 Q4 with intermediate milestone.
2	It is unclear whether for 15 minute product the GCT will also be 60 minutes? If that is the case then we see one major question. For what purpose will these products be used as the Day ahead market still is hourly, balancing purpose? If the GCT is less than 60 minutes, for instance 30 minutes, then there is place for such product, because it will provide more flexibility in case of need.	15 min. ID product might be used similarly to 60 min. ID product. The foreseen GCT is 25 min. before ISP. The ID products may be used by BRPs to reduce the foreseen imbalances during the operational day.
3	Any proposition to this respect should be done by NEMOs.	According to article 8 of the Commission regulation (EU) 2019/943 of 5th June 2019 on internal market for electricity, establishes that NEMOs shall provide market participants with the opportunity to trade in energy in time intervals at least as short as the ISP in both DA and ID markets. Therefore, NEMOs are the ones to implement 15 min. MTU in DA and ID market and in 15 min. ISP concept document Baltic TSOs proposes for NEMOs to introduce the 15 min. ID and DA products in Baltic areas in order to follow EBGL and regulation on internal markets for electricity. BRP scheduling must still be done in 15 min. resolution.
4	Nominated electricity market operators shall provide market participants with the opportunity to trade in energy in time intervals at least as short as the imbalance settlement period in both day-ahead and intraday markets	
5	In addition, it is necessary to introduce 30 minute products by Q4 2022 as these are available in XBID.	
6	There should not be products that have different time resolutions in use at the same time (15 min + 60 min).	
7	Considering the level of market integration with Nordics, volumes of Nordic balancing energy trading and intraday trading, as well as the clear signals from Nordic TSOs about the delays of 15 min ISP implementation, we strongly suggest to ask for a derogation and implement the 15 min ISP and intraday products synchronous with Nordic TSOs.	
		According to the updated Nordic Balancing Model (NBM) concept document roadmap, Nordic TSOs foresee the introduction of 15 min. ISP along with the go-live of 15 min. ID market by 2023 Q2. The Baltic TSOs are of the opinion that a 100% alignment with the Nordic roadmap is not a requirement on its own taking into account uncertainties (whether low, medium or high) on implementation in Nordics could postpone the goal set by the Baltic TSOs.

Stakeholders' comment		Baltic TSOs' Comment
Do you agree with the Baltic TSOs proposals and way forward in relation to balancing market rules and main standard product characteristics?		
1	Should be an option to choose "Minimum duration of delivery period". Timeframe of 5 minutes is too short. BSP should be allowed to change this time.	The characteristics of the standard product shall respect the European standard mFRR product design according to the MARI implementation framework. It shall be defined in the "All TSOs' proposal for the implementation framework for a European platform for the exchange of balancing energy from frequency restoration reserves with manual activation in accordance with Article 20 of Commission Regulation (EU) 2017/2195 establishing a guideline on electricity balancing."
2	We are not sure whether small full activation time, will not increase the cost of the balancing energy	
3	While NEMO favours GCT closer to real time, it is not a requirement for 15-min ISP.	
4	GCT should be as close to delivery as possible.	
5	Marginal price should be 15min for each.	
6	For the implementation of 15 minute ISP in the Baltics, changes to of the existing standard product characteristics incl. the pricing of balancing energy are required.	
7	Balancing energy volume shall be calculated and allocated for each respective quarter.	15 min. ISP document defines settlement for BSPs separately for each 15 min.
8	BRP scheduling should be the same in all three Baltic countries. LT and LV should stay with 60 minute resolution schedules till 2025.	Scheduling rules shall be consistent with imbalance settlement rules. Therefore 15 min. schedules are required for 15 min. settlement.
9	Considering the level of market integration with Nordics, volumes of Nordic balancing energy trading and intraday trading, as well as the clear signals from Nordic TSOs about the delays of 15 min ISP implementation, we strongly suggest to ask for a derogation and implement the 15 min ISP and intraday products synchronous with Nordic TSOs.	According to the updated Nordic Balancing Model (NBM) concept document roadmap, Nordic TSOs foresee the introduction of 15 min. ISP along with the go-live of 15 min. ID market by 2023 Q2. The Baltic TSOs are of the opinion that a 100% alignment with the Nordic roadmap is not a requirement on its own taking into account uncertainties (whether low, medium or high) on implementation in Nordics could postpone the goal set by the Baltic TSOs.
10	Nordic TSOs have indicated that they will establish a new Nordic mFRR energy activation market by Q4 2022. Therefore, it is of utmost importance that the market rules and main products of MARI platform and the new Nordic platform are the same. We urge the Baltic TSOs to join the new Nordic initiative.	

Stakeholders' comment		Baltic TSOs' Comment
Do you agree with the Baltic TSOs proposals and way forward in relation to the pricing of mFRR balancing energy and TSO-BSP settlement?		
1	Should be rephrased: "Pricing of mFRR balancing energy bids activated for special activation purposes shall be priced by marginal price of all balancing energy bids activated for that purpose."	<p>With regard to the balancing price and imbalance price calculation, Baltic TSOs shall carry out a separate public consultation on Baltic balancing market rules (incl. standard product) and imbalance settlement model during Q3 of 2020 applicable for milestone 1.</p> <p>An additional public consultation on both balancing market rules and imbalance price calculation, applicable for milestone 2, shall be organized during Q4 of 2022. The pricing methodology of mFRR balancing energy shall be subject to the "All TSOs' proposal on methodologies for pricing balancing energy and cross-zonal capacity used for the exchange of balancing energy or operating the imbalance netting process."</p>
2	The price 60 minutes should be calculated as simple average of 15 minutes marginal price.	
3	We prefer there would be 15 minute pricing, instead of 60 min pricing.	
4	If BRP Imbalance adjustment will be calculated based on TSO-BSP settlement result for each 15 minute ISP in MWh , then imbalance price shall not be equal for all 15 minute ISPs within an hour.	
5	"For the Step 1 of the 15 minute ISP implementation it is foreseen that Baltic balance control will be performed for the 60 minutes." This is not in line with the target to create a clear market signal at ISP level i.e. 15 minutes.	
6	Considering the level of market integration with Nordics, volumes of Nordic balancing energy trading and intraday trading, as well as the clear signals from Nordic TSOs about the delays of 15 min ISP implementation, we strongly suggest to ask for a derogation and implement the 15 min ISP and intraday products synchronous with Nordic TSOs.	
		While Baltic market is closely integrated with Nordics, proposed approach doesn't create barriers for operations between Nordic and Baltic electricity markets in regard to milestone 1. Considering the updated concept approach for the implementation of 15 min. ISP in several milestones, it is expected to achieve higher alignment on timing between Baltic and Nordic areas.

Stakeholders' comment		Baltic TSOs' Comment
Do you agree with the Baltic TSOs way forward in relation to the calculation of BRP imbalances and imbalance prices?		
1	15 minutes ISP requires substantial preparation from IT and billing systems from BRP side, thus the implementation should be postponed as long as possible – till 2025.	The updated concept document establishes a new deadline for the implementation of milestone 1 from 2020 Q4 to 2022 Q4. The TSOs feel that this should provide market participants with ample time to accommodate 15 min. ISP requirements within their respective IT systems.
2	Considering the level of market integration with Nordics, volumes of Nordic balancing energy trading and intraday trading, as well as the clear signals from Nordic TSOs about the delays of 15 min ISP implementation, we strongly suggest to ask for a derogation and implement the 15 min ISP and intraday products synchronous with Nordic TSOs.	According to the updated Nordic Balancing Model (NBM) concept document roadmap, Nordic TSOs foresee the introduction of 15 min. ISP along with the go-live of 15 min. ID market by 2023 Q2. The Baltic TSOs are of the opinion that a 100% alignment with the Nordic roadmap is not a requirement on its own taking into account uncertainties (whether low, medium or high) on implementation in Nordics could postpone the goal set by the Baltic TSOs.
3	“Balance control by TSOs: Target to minimize Baltic system imbalance for 60 minutes”. In the balancing Code definitions, 'imbalance settlement period' means the time unit for which 3 balance responsible parties' imbalance is calculated; This should be the target of step 1 to minimize Baltic system imbalance to 15 minutes.	The principle that imbalance prices are equal for all 15 min. ISPs within an hour is tied to Baltic electricity system's balance control, which for at least before the implementation of milestone 2 is foreseen to function only within 60 min. time periods.
4	Otherwise acceptable, but marginal pricing should be for 15 minutes.	A change to 15 min. balance control requires the establishment of aFRR processes and a functioning aFRR balancing market. The TSOs foresee to implement such changes by milestone 2. With regard to the balancing price and imbalance price calculation, Baltic TSOs shall carry out a separate public consultation on Baltic balancing market rules (incl. standard product) and imbalance settlement model during Q3 of 2020 applicable for milestone 1. An additional public consultation on both balancing market rules and imbalance price calculation, applicable for milestone 2, shall be organized during Q4 of 2022.
5	It is stated that „Imbalance price shall be equal for all 15 minute ISPs within an hour;“ - How can the imbalance prices be the same if the imbalances are with a different sign (+ or -) during 15 min periods. We suggest that the imbalance price would be different for every 15 minute period.	

Stakeholders' comment		Baltic TSOs' Comment
Do you agree with your connecting TSO's proposal on metered data allocation?		
1	About half of consumption is calculated by standard scheduler in Baltic country , these changes means 4 times more calculation, 4 times more data. IT systems are not prepared for these changes. Time and investments are needed to implement these modifications	Concept document and implementation roadmap is updated
2	It seems unreasonable to perform a separation in three categories (Actual 15minutes, estimated 15minutes from an hour, and estimated 15minutes for whole month) as the second and third category seems quite similar; therefore, proposal is to merge them and divide the monthly consumption with standard profile of 15minutes. In addition we are not sure whether DSO will be able to provide such information.	Concept document and implementation roadmap is updated. The updated ISP15 implementation plan in its milestone 1 gives an opportunity of gradual IT changes. Thus, BRPs, BSPs and DSOs are given an opportunity to gradually change their systems, get used to the procedures and only then introduce next layer of changes. TSOs believe that milestone model is associated with less risks than Milestone I and Milestone II implementation altogether.
3	By now DSO has installed xxx thousand smart meters and in total by the end of this year it is planned to install xxx thousand (xx % of total metering points). By the end of the year xxxx it is planned to finalize Smart meters implementation project. Baltic DSO has signed delivery agreement for xxx thousand smart meters purchase, which are planned to be installed during year xxxx and xxxx . The last procurement within Smart meters implementation project to be announced in xxxx and Directive's ("Directive of the European Parliament and of the Council on common rules for the internal market in electricity (recast)" 2 most significant technical requirements will be included in procurement requirements: 1. to ensure meters match with customers` houses energy monitoring systems; 2. ensure 15 minute resolution. As Directive is applicable only for meters which are purchased after Directive comes into force (August 2019) and meters installed before that can be used for 12 years, then for these meters DSO can provide 15 minute resolution values by dividing hourly values by 4. To apply 15 minute standard profile for metering points which do not have hourly metering possibilities, a proper algorithm should be developed.	Currently, there are a lot of place without hourly meters, while we operate in DA market with 60 min. products. Similarly, meters with 15 min. resolution are not a prerequisite for ISP15, though in the future DSOs should move towards meters with 15 min. resolution.
4	It is important to have metering in 15 minute resolution.	
5	There could be a concrete plan in place when to fully transition to 15 minute resolution measurements.	
6	No party should be treated unfairly with costs that don't belong to them, due to using profile for hourly measured points.	In line with milestone 1, no party will be treated unfairly due to use of profile for measurements.
7	Implementing 15 minute ISP as a full package primary metering data in 15 minute resolution is need	TSOs have no mandate to manage installation of meters - this is the responsibility of DSOs.
8	The TSOs should take all necessary steps to apply 15 minute metering to all customers in all Baltic states latest by Step 1 deadline (Q4 2022).	
9	There could be a concrete plan in place when to fully transition to 15 minute resolution measurements.	

Stakeholders' comment		Baltic TSOs' Comment
Do you agree with the Baltic TSOs proposed 15 minute ISP implementation roadmap?		
1	Considering the level of market integration with Nordics, volumes of Nordic balancing energy trading and intraday trading, as well as the clear signals from Nordic TSOs about the delays of 15 min ISP implementation, we strongly suggest to ask for a derogation and implement the 15 min ISP and intraday products synchronous with Nordic TSOs.	While Baltic market is closely integrated with Nordics, proposed approach doesn't create barriers for operations between Nordic and Baltic electricity markets in regard to milestone 1. Considering the updated concept approach for the implementation of 15 min. ISP in several milestones, it is expected to achieve higher alignment on timing between Baltic and Nordic areas.
2	The process must be aligned with the Nordic approach. According to current information the deadline for full implementation of 15 min ISP in the Nordics will be Q4 2022. Hence, Step 1 deadline must be the same - Q4 2022.	
3	In order to estimate the needed resources (time, human and financial resources) for implementation of 15 minute ISP, DSO should conduct substantial analysis. At this point detailed analysis is not performed and DSO cannot confirm proposed 15 minute ISP implementation roadmap. Taking into account available resources, DSO plans to finalize the analysis and provide the plan for 15 minute ISP implementation in 2020.	Concept document and implementation roadmap is updated The Baltic updated roadmap foresees the postponement of milestone 1 implementation from 2020 Q4 to 2022 Q4. One of the main goals of milestone 1 is to establish 15 min. data exchange capability. The new deadline for milestone 1 should provide market participants with ample time for investments to data exchange procedures.
4	In general the roadmap is ok, keeping the other comments in mind. The plan is concrete and flexible, although the implementation is earlier than wanted and it should be harmonized with the Nordic plan.	15 min. meter readings are expected by milestone 2 starting from 2024 Q4, subject to national rules and regulation.
5	Too short time period to prepare for these changes	

Stakeholders' comment

Do you have any general views or opinions on the Baltic 15 minute ISP implementation framework concepts provided in this consultation document or what it is lacking therefor?

1	Cost-benefit analysis is missing. In our view the costs for implementation of 15 minutes ISP are substantial and (until major part of consumers has automated meters) benefits are negligent.
2	<p>At current state it is difficult for DSO to give a concrete opinion on the provided general approach without knowing the specific requirements for implementing 15-minute resolution metering.</p> <p>DSO's capabilities and need for investments for using 15-minute resolution on a certain number of metering points by the year 2021 needs additional analysis and should be discussed and considered in the upcoming working group which will be summoned for updating the local legislation.</p> <p>Also, we would like to get a better understanding on the needs of the main party concerned – system operator, TSO. What is TSO's position on the power and energy volumes in the system that should be on a 15-minute resolution metering and what would be the consequences and social costs if it is not implemented by the end of 2020 or 2025? Answering these questions would be a good basis for starting further discussions with other market participants.</p> <p>Regarding the possibility of dividing hourly volumes into 15-minute resolutions our position is that it should be done on the Data Hub.</p>
3	Most of the concerns have been commented
4	We are in favour of harmonised European approaches for Imbalance Settlement Periods
5	Considering the level of market integration with Nordics, volumes of Nordic balancing energy trading and intraday trading, as well as the clear signals from Nordic TSOs about the delays of 15 min ISP implementation, we strongly suggest to ask for a derogation and implement the 15 min ISP and intraday products synchronous with Nordic TSOs.
6	Timeline of the Baltic 15 minute ISP implementation process must be the same as in the Nordic area.
7	<p>In general the framework is ok, keeping the other comments in mind. The plan is concrete and flexible, although the implementation is earlier than wanted and it should be harmonized with the Nordic plan.</p> <p>To be able to move to 15 min resolution, all Baltic countries' TSOs should have functioning message exchange systems that can send and receive messages in XML-format (in use in Nordic countries).</p>

Stakeholders' comment

Please list down the conditions and reasoning that would hinder the implementation of 15 minute ISP in Baltic region and should require derogation from EBGL Article 53(1) (i.e. outcome of Nordic NRAs decision)

1	<p>Terms of implementation of such changes in the market must be postponed, because:</p> <p>1) The purchase and development of IT systems takes 2-3 years (with public procurement) with substantial investments that will result in price rise for end consumers;</p> <p>2) About xx% customers in Baltic country do not have smart meters, their consumption is calculated according standard scheduler. It is necessary to install smart meters on their side and to get IT systems ready for working with 15 minutes ISP;</p>
2	<p>There is an important role of the short term markets for balancing, which should be kept in mind in the implementation of the new imbalance settlement period</p> <ul style="list-style-type: none"> • We are open to discuss further steps forward
3	<ul style="list-style-type: none"> • In general there shouldn't be any difference between 3 markets. • Change to 15 minutes could happen only, if technical capability from DSO's is guaranteed. • Balance planning change does not work base profile (60 min/4), actual metering data is required • At present we see that although there's obligation to collect hourly data in Baltic country for all consumption sites, some grid companies ignore that. • all DSO-s should be able to deliver aggregated metering data for balance providers regarding retail companies in their balance area. In Baltic country, DSO has informed that they are not able to deliver that info for balance providers any more due to IT development. They can't handle hourly metering data, then handling 15 minutes data is unreal. • What is the social economical effect of this change? • Technical analyses of current datahubs and data management systems should be done before any changes. Harmonization of datahubs or one datahub for the Baltic states.
4	<p>We strongly suggest to implement 15 min ISP and intraday products synchronously with Nordic Countries (Sweden, Denmark, Finland + Norway)</p>
5	<p>Outcome of Nordic NRAs decision; Nordic implementation timeline; harmonized installment of 15 minutes readers in the Baltic states</p> <p>As the Nordic TSOs are planning to establish a common trading platform for mFRR and a common standard product, we expect that (i) the market rules in the Baltic states for mFRR and the standard product will be harmonised with the Nordic market; and (ii) a common shared orderbook with the Nordics will be established. The decision to join the common Nordic project must be made urgently by the Baltic TSOs because further integration of Nordic and Baltic markets will increase efficiency and lower system costs. MARI platform will have serious shortcomings (less liquidity, etc) in this region compared to Nordic TSOs project.</p>