

Lausunto annettiin 18.11.2019 [www-sivujen kautta seuraavanlaisena](http://www-sivujen.kautta.seuraavanlaisena):

Finnish Wind Power Association (FWPA) does not agree with the inclusion of the technical price limit at the proposed level. The balancing costs should be based on the actual production costs of the balancing power as it is done now in Norway and in Sweden. In markets like Finland where there is scarcity of the balancing power the possibility to offer the balancing on the market up to certain price limit (5000 €/MWh) has led to situation where balancing power is offered to the market on very high price (3000 €/MWh).

The proposed price limit means on a banker's point of view unpredictable element in power production costs. All the costs and cash flows should be estimated before a project may obtain loan / financing. With such a high price limit it is impossible to estimate the balancing costs when financing the project. In the worst case a possibility of an extremely high balancing costs may risk the climate targets of the EU by decreasing the bankability of the renewable energy projects.

Allowing very high up-regulation prices may be problematic especially for wind power. In cases when wind power plants cannot adjust their generation levels upwards (after a forecast giving too high generation bid and error requiring upregulation), the risk of high imbalance payments may result in starting to use strategic bidding, bidding lower levels of generation (and then providing downregulation bids if generation higher than predicted). The limit proposed is much higher than for example Texas ERCOT system has concluded necessary (in the order of 10 000 euros/MWh).