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What to expect after electricity market opening - assessment of latest regulations Oleksii Mykhailenko Kyiv, June 26th 2019

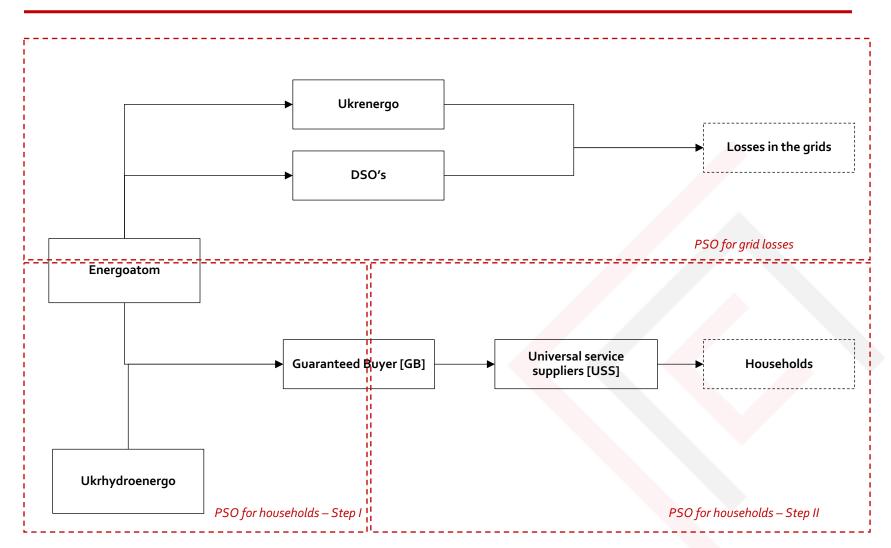


Status before market opening

- Bidding caps for DAM, IDM are established for 9 months at the level of UAH 2/kWh for peak hours, UAH 0.96/kWh for night hours.
- Bidding caps for balancing market (BM) and auxiliary services market are set until full synchronization with ENTSO-E. BM is limited within a range of 0.85 - 1.15 x DAM.
- Market Operator and Guaranteed Buyer received licenses and starts signing agreements.
- Not all metering points are registered, not all market players took part in testing.
- IT platforms were not thoroughly tested.
- PSO adopted to ensure stability of tariffs for households, but the mechanism may not be optimal.

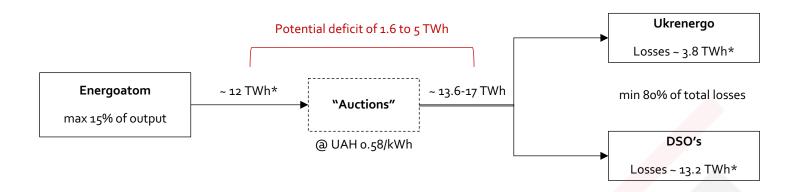


PSO mechanism scheme and its subjects as adopted on 19-06-2019 and valid until end 2020





PSO for covering grid losses

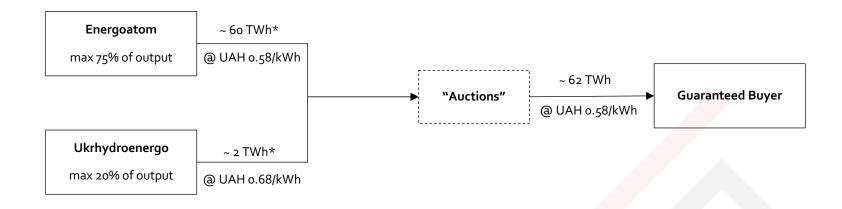


- Not a real "auction" price ceiling is set, no competition possible
- Relatively low price limit hardly creates incentive for grid operators to decrease losses
- PSO mechanism design flaw creates potential deficit, thus violating the regulation

^{*}data on losses and production volumes is based on actual for 2018



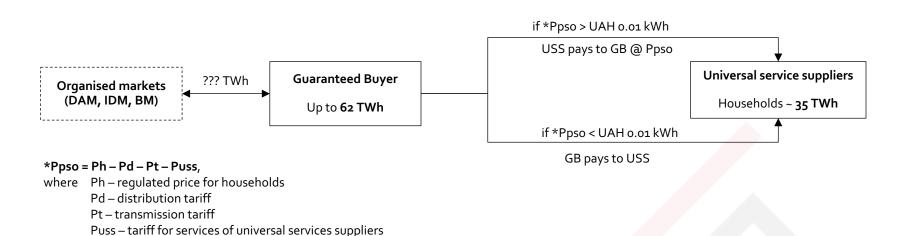
PSO for supply to households – Step I



- Not a real "auction" price ceiling is set, no competition possible with only one buyer and different products (base and peak power)
- The regulations doesn't provide info on how and by whom PSO volumes are determined and controlled, only maximum amount.
- GB becomes a new "single buyer", an intermediary with potential access to a lot of cheap electricity and possibility to buy and sell on organized segments



PSO for supply to households – Step II



- ➢ If maximum allowed under PSO volumes are bought by GB from generators in Step I − GB may accumulate significant profits, simply redistributing wealth to it
- Addition of the GB as an intermediary between generators and USS may increase final prices for industrial consumers
- ➤ No clear procedure to determine volumes of consumptions by households sold to suppliers potential benefit for USS in form of cheap electricity

^{*}data on losses and production volumes is based on actual for 2018



Issues after July 1st, 2019

- Energorynok debts situation is not resolved.
- Retails prices for households and small consumers are fixed.
- Retails prices for industrial consumers are not regulated or capped, and will depend solely on state of competition between suppliers.
- Clear schedule to eliminate cross-subsidies is not in place. And while retail prices for households are bigger than wholesale price – it de facto exists.
- Adopted PSO as a way to protect households is not optimal for the market functioning. Direct monetization might be a better and more transparent option.
- With a relatively low price cap on balancing market trading might migrate mostly to BM, undermining liquidity on and development of DAM and IDM.



Key messages

- The market will start on July 1st, 2019, with certain "safe mode" features in place. Safeguards help to avoid significant shocks in the beginning, but they also restrain development and contain the current structure under control.
- Price caps and PSO are set for a limited duration of time. But there is nothing more permanent in Ukraine as temporary measures. Clear further steps for making market more efficient should be communicated.
- Main focus should be on identifying and dealing with structural problems, which will allow for effective competition and fair and equal access to the market.



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