

## **Einius Lukšys**

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**From:** Bergman, Mårten  
**Sent:** ketvirtadienis 2020 m. spalio 8 15:54  
**To:** Einius Lukšys; Ignas Kazakevičius; Rimgailė Baliūnaitė; Info (info@vert.lt)  
**Cc:**  
**Subject:** SV: Public consultation of Lithuanian CRM methodologies  
**Attachments:** Answers consultation questions\_Lithuanian Capacity Mechanism\_Svk.pdf

Dear all,

Svenska kraftnät appreciates the opportunity to give our thoughts on the proposed capacity market methodologies.

Generally, Svenska kraftnät do not have any strong objections on the target solutions for methodologies. However, we find the transitory solution proposed for delivery year 2025 to be flawed. The de-rating of interconnector capacity, especially in the transitory solution, is not in line with regulation 2019/943 and does not follow other methodologies such as the Polish, where MAF is used.

In addition, Svenska kraftnät do not support the proposed method for congestion income sharing. It should be equal rules for all participants in the capacity market regardless the existence of an own capacity market. The Polish capacity mechanism shares congestion income 50/50 independent of the status of the respective party. Otherwise, the mechanism is either state aid or discrimination of transmission capacity. TSOs must get the costs for their commitments covered in one way or another.

More detailed comments can be found in our answers to your questionnaire.

Best regards,

Mårten Bergman

MÅRTEN BERGMAN

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