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**Reference: 21/01999****Høring over Energinets metode for indkøb af modhandelsenergi**

Vattenfall welcomes the opportunity to comment on the proposal. Vattenfall has been an active stakeholder throughout the development of the proposal and did participate in Energinet's previous consultation of the proposal.

Vattenfall support the proposal and recommend it to be implemented as soon as possible

Motivation: Our high level position is that market-based solutions which maximizes competition and efficiency should be prioritized. Hence Vattenfall welcomes Energinet's proposal to use the intraday market as a means of ensuring capacity on the Danish (DK1) and German interconnector rather than the current situation with special regulation. Shifting the countertrade to the intraday market will allow more actors to participate with increased market liquidity and competition as a direct consequence. This will result in more efficient prices to the competitive markets and ultimately more system- and socioeconomical efficiency to the benefit of society and climate. It's a pragmatic way of solving challenges at hand, but also a new model where the prudent approach is to trade and test small volumes and ramp up volumes with time and experience. We look forward to contributing to refining the model.

Concerns have been raised that the new model will distort wholesale market prices, but we do not share the view that this will have a significant impact in the long term, and this risk exist also in the current model, with the difference that trading today takes place in the smaller regulation power market. Thus, we expect that this risk will diminish since the suggested model, as it will increase competition for these countertrade volumes.

Yours sincerely,

Esben Baltzer Nielsen  
Head of Public and Regulatory Affairs Denmark  
Vattenfall