

## EuropeX Response to the CCRs Consultation by ENTSO-E

1. EuropeX welcomes the paper by ENTSO-E as part of the CACM implementation. EuropeX has long been an active promoter and enabler of European market integration, and the optimal availability of transmission capacity is critical to achieving this goal. Harmonisation of capacity calculation methodologies within and between regions, together with improvements in the precision and timeliness (e.g., intraday recalculation) of the calculation methods and processes, should be a high priority with significant benefits for Europe.
2. The CCR definition should support the efficient operation of single day-ahead and intraday market coupling. The reason being that it can impact the time- and cost-effective implementation of the IEM Target Model across Europe.
3. We would like to better understand the approach (including, inter alia, assumptions, model(s), scenario(s), selection criteria) used to decide on the particular regions proposed in the paper.
  - a. Were there alternatives that were considered, and why were they not selected instead?
  - b. Was a common assessment methodology for the determination of all CCRs used? Were similar criteria applied, and what were they?
  - c. Was an assessment made of the impact of the CCR solution performed? For example, the implications for market stakeholders.
  - d. Was there consideration of the impact on existing market couplings (in operation as well as in development/implementation phase), ensuring that the proposed CCRs are not putting these initiatives (which represent real progress towards the IEM target) at risk?
4. We are concerned that the CCR could become, in effect, permanent. They may lead to regions adopting different capacity calculation methodologies that could make it harder to merge regions in the future. Standardisation of methodologies may mitigate this, but it is not clear if this is intended and how it can be achieved in practice.

5. The CCRs should allow for some flexibility so that they do not become barriers for possible new development paths, such as incremental extension of existing regions.
6. We would like to see a clearer vision for the target capacity calculation regions (we assume it would be fewer regions), and a roadmap for how this will be achieved. This would also help establish the necessity for the interim regions to adopt common methodologies that can be more readily integrated later. It would also reduce the risk of TSOs introducing non-coordinated and possibly contradictory new functional requirements to the DA and ID market coupling algorithms.
7. We are concerned about the possible practical implications of the exclusion of presently non-EU/non-CACM countries from the CCRs, and of certain proposed solutions involving a stepwise approach.
  - a. We know that Norway since the mid-1990s is a core member of the Nordic coordination of capacity calculation and allocation from the Day Ahead to real time Balancing Market stage. We expect this to continue, but wonder if there is any impact on those integrated Nordic processes if Norway initially will not be legally a part of the Nordic CCR.
  - b. While Switzerland may not be part of the DA/ID capacity *allocation*, are they still fully able to participate in the capacity *calculation* in the relevant CCRs?
  - c. Why is a two-step approach applied for including the RO-HU border in the in CEE CCR? What are the economic and security benefits of such approach?
8. We believe that, considering the possible implications that the approved CCRs will bring for all involved stakeholders, very careful consideration should be applied in the process of CCRs definition and approval - and a high degree of transparency is very important. Existing regional stakeholder structures could play a useful role.

**Contact:**

E [secretariat@europex.org](mailto:secretariat@europex.org)

T +32 2 512 34 10