

ACER consultation on the revision of Capacity Allocation and Congestion Management Guideline (CACM GL)

A Eurelectric response paper

June 2021

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We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal: D/2021/12.105/27

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KEY MESSAGES

General:

- Eurelectric welcomes this ACER proposal but would like to stress that it represents **quite an extensive review of CACM**, including many options and/or non-expected disruptive changes and regrets that there have been no prior consultations/discussions on many issues where ACER is coming with new proposals (new MCO governance, non-uniform pricing approach, new rules for the Bidding Zone Review process). The workshops organized by ACER at the beginning of the consultation were not sufficient to address these topics.
- Concerning the re-scoping of CACM (see Article 1 and Articles 35 and 74 on Redispatching & Countertrading (RD & CT) deleted from CACM)
 - Eurelectric does not agree to restrict the **subject matter and scope of CACM** to DA and ID market coupling but believes that CACM should continue to include in its scope the congestion management in the day-ahead and intra-day markets (in particular, the principles for coordinated redispatching and countertrading). Capacity calculation, bidding zone review and RD & CT should be enclosed in a same Regulation since they are all congestion management measures, for sake of consistency and efficient functioning of the markets on the DA and ID timeframes.
 - Eurelectric is concerned deleting completely the mention of RD & CT from CACM on the sole justification that all provisions are moved into SO GL, whereas Electricity Regulation calls for market-based congestion management. Eurelectric proposes rather to keep a shortened article in CACM on the principles for RD & CT, with the proper cross-referencing to SO GL Article 75-78 and mentioning that RD & CT measures have to be optimized and determined according to the provisions for regional operational security coordination (ROSC).
- - On the contrary, moving from CACM to SO GL the provisions related to the common grid model can make sense. Eurelectric welcomes the improvements proposed to introduce more transparency in the processes with detailed requirements in terms of **publication of information** (Article 13A) but calls for more precise and complete provisions (on the algorithms and methodologies used by NEMOs, TSOs and CCRs and on the data, assumptions and methodologies used in the BZR).

Bidding zone review process:

- Eurelectric believes CACM should favor cross-referencing and not pick up text passages of **Electricity Regulation 2019/943** (ER) leading to misunderstanding and inconsistency. This is in particular the case for the amendments related to the **Bidding Zone Review process**

(Article 32 and 33). Eurelectric does not agree introducing provisions on BZR process modifying or conflicting those in ER, whereas in its proposal, ACER rewrites the entire BZR process. On this topic, provisions in ER Article 14 were agreed as an output of the Clean Energy Package debate and Eurelectric considers CACM should not change the compromises reached in 2019. In particular, Eurelectric asks that EC decision of last resort to change bidding zone configuration should be limited to the cases mentioned in ER Article 14(8).

- Eurelectric considers that further improvements are needed in terms of **stakeholder involvement** (in particular, market participants) during the **BZR process**. An advisory committee including representatives of concerned stakeholders should be put in place and consulted for critical decisions in the matter. In addition, in the context of the ambitious EU offshore wind strategy relying notably on **hybrid offshore projects** (cf. Eurelectric discussion paper on market arrangements for offshore hybrid projects), we believe that the BZR process should be improved to correctly consider the development of these projects, requiring stable long term price signals and a bidding zone delineation stability.

Market Coupling Operator governance:

- Though Eurelectric does not express a preference among the two options proposed by ACER on **MCO governance** (Title II), Eurelectric would like to stress its main points of concern on this topic :
 - Eurelectric is mostly concerned if radical or structural changes in MCO governance would have an impact on the implementation in progress of the algorithms used by the MCO, regarding the additional burden of implementation for NEMOs and TSOs. The priority from Eurelectric perspective is that MCO governance changes should **not delay the implementation of CACM 1.0** and lead to no step back in terms of MCO functionalities for market participants.
 - Eurelectric recognizes that challenges still exist on the MCO governance as of today (cf. unanimity based decision and blocking minority) that do not help for an efficient decision making.
 - Eurelectric sees the need for more stakeholder involvement, for example through a **MCO consultative group** and an advisory council with representatives of market participants to voice preferences in strategic decisions of the MCO function.

Capacity calculation:

- Eurelectric notices that ACER introduces in CACM (cf. Article 21(3)) the principle of a compliance of the capacity calculation methodology with the **70% constraint** (cf. ER Article 16(8)). Eurelectric stresses that this principle should not impede TSOs to trigger the remedial actions necessary to maintain the transmission system efficiently within operational security limits..
- Eurelectric calls for an EU methodology to perform the cost-benefit analysis complementing the justification of **allocation constraints**, as well as an approval by ACER. This methodology, supposed to show that allocation constraints are the economically most efficient measure among all alternatives to address operational security issues should be made available to all market participants of the concerned CCRs (Article 24).
- Eurelectric considers that beyond political issues and as matter of market efficiency and operational security, CACM should define a framework for the **inclusion of third countries** in the coordinated capacity calculation process and also for congestion management.

DA and ID market coupling and coupling algorithms:

- Regarding **ID auctions**, should they be introduced in complement to intraday continuous trading, Eurelectric considers both their number and interruptions of the continuous

trading should be limited. Eurelectric also calls for a **regular monitoring** in order to assess their effects in terms of efficiency, cross-zonal capacity allocated and impact on the liquidity of the continuous SIDC (Article 36).

- Eurelectric is calling for a **dedicated workshop on non-uniform pricing** introduced as a possibility for the DA and ID market coupling algorithms (Article 36AA). More details and transparency are required on the approach and its impacts (cf. possible side-payments for market parties and impact on market prices), as well as guarantees it will allow the accommodation of an increasing diversity / complexity of products. Eurelectric provides a first feedback to ACER on this topic (in IV.1.1).

Eurelectric asks for a mandatory **accommodation of (simple and complex) products** by the DA and ID algorithms when they are traded in more than three Member States (so that assets are correctly offered/priced on the markets). See Eurelectric proposal on Article 36B.

Options in the draft amendments

In the process of drafting the amendments by ACER and NRAs, there were areas where there are two different proposed amendments (options). Because these optional amendments are sometimes interrelated or only deal with a specific paragraph they are listed below for clarity. Questions on these options are included as separate questions under each respective section.

Title II MCO & Title IV Market coupling (Decentralized vs Centralized)

II.1 MCO organisation (Article 3A)

O1: multiple entities performing MCO tasks O2: Legal Single Entity as MCO

II.2 Tasks and responsibilities (Article 3B)

O1: clear allocation of tasks to MCO + some tasks to TSOs and NEMOs O2: all tasks on the MCO

II.3 Costs (Article 75A)

O1: decentralized cost recovery O2: centralized cost recovery

IV.4 post coupling (Article 68/68A)

O1: clearing and settlement BRP on each NEMO / / Congestion income distribution on each TSO

O2: clearing and settlement /BRP(XB) Congestion income distribution done by MCO

Title III Capacity Calculation

● III.2 Capacity calculation inputs on reliability margins (Article 22(5)): O1: FRM per CNEC for both CNTC and FB

O2: TRM for CNTC vs FRM for FB

III.3 Capacity Calculation process (Article 28(6)&(7)):

O1: ACER proposal including minRAM/70% as in Core CCM & CTNC built on FBO2: only general 70% requirement

Title VI Bidding Zone Review

Content of technical report (Article 34.2)

O1: include threshold for reporting on physical congestion O2: no explicit threshold

SOGL proposals

● SOGL.1 CGM - Best forecast (Article 67(3) & 70(3)): O1 Keep current CACM text in SOGL

O2 Inclusion of best forecast of RAs in CGMSOGL.2 RDCT cost sharing (article 76.4)

O1: Keep current CACM text in SOGL

O2: adapted text in line with ACER decisions on RDCT cost sharing

TITLE I - General provisions

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[210413_PC_AM_I_General_provisions_final.pdf](#)

Amended/New articles:

Article 1 Subject matter and scope

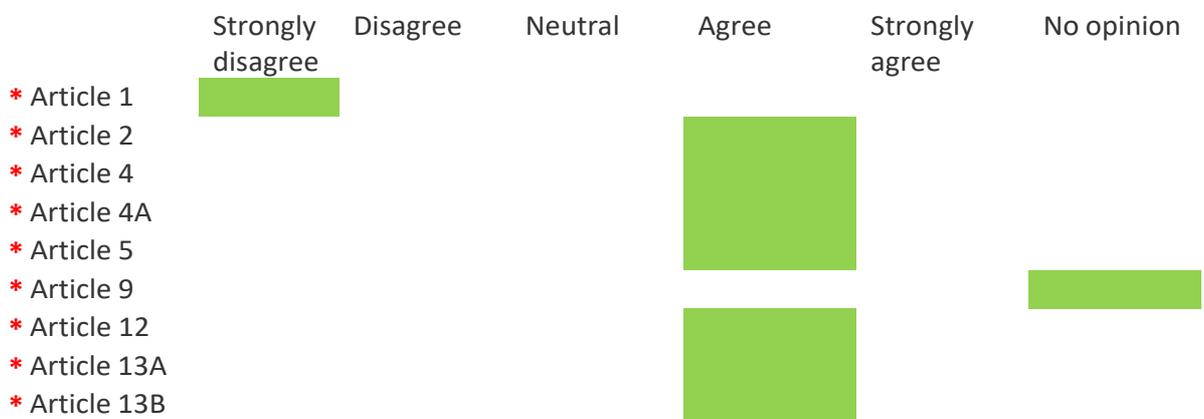
Article 2 Definitions

- Article 4 NEMOs designation and revocation of the designation
- Article 4A Last resort NEMOs service provider (options in this article depend on options under II.1)
- Article 5 NEMOs designation in case of a national legal monopoly for trading services
- Article 9 Adoption of terms and conditions or methodologies
- Article 12 Consultation
- Article 13A Publication of information
- Article 13B Delegation of tasks

No changes to articles:

- Article 3 Objectives of capacity allocation and congestion management cooperation
- Article 6 NEMO designation criteria
- Article 10 Day-to-day management of the single day-ahead and intraday coupling
- Article 11 Stakeholder involvement
- Article 13 Confidentiality obligations

I What is your opinion on the proposed amendments?



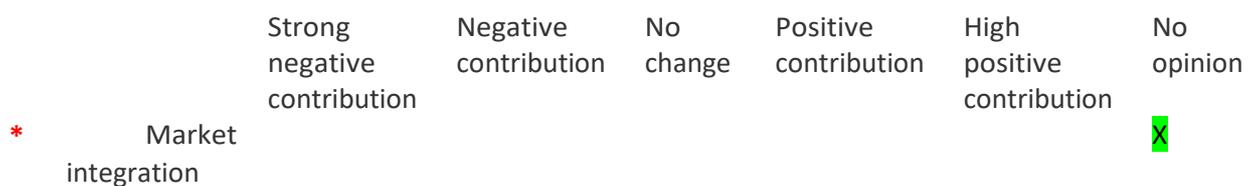
* I Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

I Please provide your (additional) consideration on the reasoning if necessary.

The reasoning for the re-scoping of CACM GL is not sufficient according to Eurelectric, see as well our comments on Article 1 paragraph 1 here below.

I How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of Electricity Regulation](#)?



- * Non-discrimination X
- * Effective competition X
- * Efficient functioning of the market X

* I Do you want to provide a different proposal?

- Yes
 No

I Please write your amendment proposal and the reasoning in the table below. You can also provide amendments for articles for which no amendments are proposed.

	Amendment	Reasoning
Article 1	1. This Regulation lays down detailed guidelines on market coupling and congestion management in the day-ahead and intraday markets.	<p>1. Eurelectric does not agree with changing the subject matter and scope of CACM guidelines and moving the provisions on costly remedial actions redispatching and countertrading (CACM 1.0 Article 35 and 74) into SO GL. In accordance with Electricity Regulation 2019/943 (ER) Article 16, CACM GL should not be reduced to a matter of day-ahead and intraday market coupling but continues to include in its scope the cross-zonal congestion management in the day-ahead and intra-day markets (in particular redispatching & countertrading provisions). This is also a matter of consistency of market functioning for the DA and ID timeframes.</p> <p>- In its proposal, ACER still includes in CACM 2.0 the guidelines for the capacity calculation for the DA and ID timeframes and for the bidding zone review, which are both congestion management measures as much as redispatching & countertrading. Eurelectric supports the consideration of all these measures in the same guidelines for sake of consistency.</p> <p>- According to ER Article 16, congestion management has to be market-based, whereas SO GL is about network system security operation and not about market operations (SO GL is not a market code). Moving provisions about costly remedial actions (redispatching & countertrading) in SO GL entail the risk of an inconsistency / disconnection between those and a global and efficient market-based approach.</p> <p>- Eurelectric is concerned deleting completely the mention of RD & CT from CACM on the sole justification that all provisions are moved into SO</p>

		GL. Eurelectric proposes rather to keep a shortened article in CACM on the principles for RD & CT, with the proper cross-referencing to SO GL Article 75-78 and mentioning that RD & CT measures have to be optimized and determined according to the provisions for regional operational security coordination (ROSC).
Article 2	<p>6. 'allocation constraints' means the allocation constraints to be respected during capacity allocation to maintain the transmission system within operational security limits and have not been translated into cross-zonal capacity or that are needed to increase the efficiency of capacity allocation established pursuant to Article 24 of this Regulation.</p> <p>11. 'RCC' means regional coordination centre in accordance with Article 2 (69)(63) of Regulation (EU) 2019/943.</p> <p>[add an item] 'capacity calculation inputs and outputs' mean cross zonal capacity calculation inputs and outputs established pursuant to Article 28 of this Regulation.</p>	<p>6. Article 24 describes the allocation constraints. Therefore, it is better to cross-refer to Article 24 of this regulation.</p> <p>11. The proposed amendment had incorrectly referenced to Article 2 (69) of Regulation (EU) 2019/943. The correct article is Article 2 (63). Eurelectric proposes to add this missing definition for a clearer reading. Also, we propose that the list of cross-zonal capacity calculation inputs and outputs shall be detailed in a separate Article XX to be added to the CACM GL. They are currently listed in Article 28 (1) and 28 (9) but it would be better to separate them in a dedicated article for the sake of clarity.</p> <p>Furthermore, in the context of uniform-pricing concept introduced in the proposal, Eurelectric stresses that a clear definition of uniform pricing (and/or if necessary, of non-uniform pricing) should be added for the sake of clarity if such a new approach is finally introduced. This is needed because these are not defined in other EU Regulation or Methodology. If needed, a definition of uplifts introduced by non-uniform pricing models should be added as well.</p>
Article 3		
Article 4		
Article 4A	Option 1	According to Eurelectric, option 2 for Article 4A is not appropriate since MCO function should be targeted on the regulated activities and should not develop and operate NEMO functions which are to be managed in a competitive framework. From a global welfare perspective, the solution with an entity selected through a competitive

		tender (option 1, Article 4A) is the right option for choosing the last resort service provider.
Article 5		
Article 6		
Article 9		2. Eurelectric do not understand the articulation between this 50%-50% voting per Member State and the provisions in paragraph 2. This should be clarified in this Article.
Article 10		
Article 11		
Article 12		2. These provisions are not sufficient: Art. 12 (Consultation) should include an obligation to consult relevant regional and pan-European terms & conditions and methodologies in the preparation phase as well as before submitting final TCMs to the Agency.
Article 13A	<p>4b. by each RCC as soon as it becomes available the most up-to-date information related to the capacity calculation process on:</p> <ul style="list-style-type: none"> i. Cross zonal capacity calculation inputs pursuant to Article xx28, and for common grid models at least on a representative set of market time units ii. Cross zonal capacity calculation outputs pursuant to Article 30A iii. Planned and ordered costly and non-costly remedial actions. <p>4c. by each TSO as soon as it becomes available the most up-to-date information related to:</p> <ul style="list-style-type: none"> i. Planned and ordered costly and non-costly remedial actions as scheduled by the TSOs ii. Cross-zonal capacity calculation outputs for its 	<p>Eurelectric welcomes the initiative of ACER to improve the transparency requirements/ information publication by NEMOs, TSOs and RCCs. On some points, the requirements should go further to meet expectations of market participants.</p> <p>4b. Transparency of all the capacity calculation (CC) parameters, inputs and methodology is required (which is not the case so far), to enable the market participants to fully reproduce the results of the CC process.</p> <p>4c. Eurelectric proposes the addition of this list to be made available by TSOs in 4c</p>

	<p>bidding zone borders or critical network elements for reason of operational security pursuant to Article 30 and the reason for every deviation with respect to the outputs from the RCCs foreseen in Article 29</p> <p>iii. Allocation constraints methodology and CBA study foreseen in Article 24</p> <p>4d. by each NEMO as soon as it becomes available the most up-to-date information related to:</p> <p>i. after the orders are matched, all the blocks with their status of execution and prices per trade produced by each SDAC and SIDC algorithm, including all details of complex orders (exclusive, linked, family, etc.) in an easily accessible format</p> <p>ii. the information on aggregated bid/offer curves (with executed volumes and prices) from SDAC and SIDC in an easily accessible format for at least 5 years, including all executed orders (both simple and complex), for each bidding zone</p> <p>4e. by the MCO function, the methodology and results of the assessment studies foreseen by Article 3B(1)</p>	<p>4d. Paragraph 4d should be more precisely written. As soon as it becomes available, NEMOs should publish per bidding zone and for DA and IDA:</p> <ul style="list-style-type: none"> ○ one file with the blocks, including all details of complex orders (exclusive, linked, family, etc...), details about the execution (or not) of the blocks, and prices ○ one file with the bid/offer curve, with executed volumes and prices <p>4dii. Eurelectric requests the obligation to publish the aggregated bid curves (for DA and IDA), including complex orders, at a bidding zone level. In addition, it should be considered whether the publication of aggregated bid/offer curves and complex orders in some bidding zones is likely to cause competition issues. If this leads to a reduced level of transparency, Eurelectric highlights that this may have an impact in terms of efficiency, and should be taken into account as a criterion of the Bidding Zone review.</p> <p>4e. In this article, a paragraph should be added to clarify that the assessment studies foreseen by Article 3B(1) should be made available to all market participants.</p>
Article 13B		

TITLE II - Organisation of market coupling and of capacity calculation

Chapter 1 - MCO organisation

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[210413 PC AM II.1 MCO Organisation final.pdf](#)

Amended/New articles:

- Article 3A MCO governance principles
 - Option 1 - Multiple entities performing MCO tasks
 - Option 2 - Legal Single Entity as MCO
- Article 3C MCO plan
- Article 3BB Assignment of MCO operational tasks

II.1 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 3A Option 1						
* Article 3A Option 2						
* Article 3C						
* Article 3BB						

II.1 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

II.1 Please provide your (additional) consideration on the reasoning if necessary.

General opinion on changing MCO governance: Eurelectric does not express a preference for MCO governance among option 1 (decentralized) and 2 (centralized). However, Eurelectric welcomes the improvements made in CACM 2.0 in the definition of tasks for MCO(s), NEMOs and TSOs, as well as the details provided for MCO plan, development and organization.

In priority, Eurelectric requests that amending MCO governance should not delay the implementation in progress of the algorithms used by the MCO and lead not to any step back of MCO functionalities for market parties. In particular, some principles in the options proposed by ACER on unbundling of entities in the MCO function can require structural changes, which could mobilize the resources that are actually needed to deliver the improvements in market coupling scheduled in the very next years. Eurelectric welcomes the proposal for a decision based on qualified majority in MCO governance, that will probably facilitate the decision making and avoid blocking votes as happens when it is a decision on the basis on unanimity.

Request for an official stakeholder involvement: Eurelectric requests an improvement of the involvement of market participants in the MCO governance. Modifying MCO governance in CACM GL gives this opportunity.

Eurelectric notes that market participants are currently excluded from the MCO governance. CACM should mandate that the interests and constraints of all users of the electricity system should be considered in the decisions related with the MCO function, which should not favour some stakeholders to the detriment of others. This has not been the case until now.

Even though the MCO organisation already involves stakeholders in terms of reporting and information, e.g. through the regular Market European Stakeholder Committees (MESCs) meetings, it is necessary to go further with the participation of representatives of the market participants in the MCO governance.

Eurelectric requests that representatives of market participants should participate to the MCO governance and be able to voice preferences in the governance body of the MCO function. More stakeholder involvement is required in the strategic decisions on the MCO function.

Article 11 “Stakeholder involvement” (which is not subject to amendments in current ACER proposal) should be modified according.

Concretely, Eurelectric asks for:

- the official launch of a “MCO consultative group” on European DA and ID market coupling implementation with the participation of all stakeholders (NEMOs, TSOs and representative of market participants) with a governance and organization model similar to the one set in the CORE consultative group (in particular, regular meetings and chair and vice-chair rotating among stakeholders);
- the organization of regular meetings, four times a year, of a “MCO advisory council”, with the participation of all stakeholders, to share and discuss in upstream strategic decisions on the MCO function.

II.1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article 59 (4) of the Electricity Regulation?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration						X
* Non- discrimination						X
* Effective competition						X
* Efficient functioning of the market						X

* II.1 Do you want to provide a different proposal?

- Yes
 No

II.1 Please write your amendment proposal and the reasoning in the table below.

	Amendment	Reasoning
Article 3A Option 1		
Article 3A Option 2		
Article 3C		Beyond the list of projects, providing the priority

		level assigned to each issue is indeed important. The market can then properly expect progress or results, which is not possible when there is no visibility on NEMO or TSO prioritisation of works. This is all the more important when several projects in fact mobilize the same resources.
Article 3BB		

Chapter 2 - Tasks and responsibilities

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Amended/New articles:

Article 3B MCO tasks (options in this article depend on options under II.1) Article 7 NEMO tasks

Article 8 TSOs' and RCCs' tasks related to single day-ahead and intraday coupling

II.2 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 3B						
* Article 7						
* Article 8						

* II.2 Do you consider the reasoning for the amendment sufficient?

- No
 Neutral
 Yes
 No opinion

II.2 Please provide your (additional) consideration on the reasoning if necessary.

II.2 How do the proposed amendments contribute to the achievement of the objectives pursuant the article 59 (4) of the Electricity Regulation?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration				X		
* Non-discrimination						X
* Effective competition						X
* Efficient functioning of the market				X		

* II.2 Do you want to provide a different proposal?

- Yes
 No

II.2 Please make the amendment proposal and the reasoning in the table below.

	Amendment	Reasoning
Article 3B		
Article 7		1 c) 1(d) Eureka requests to clarify the circumstances in which the orders have to be accepted and rejected.
Article 8		

Chapter 3 - Costs

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Amended/New articles: Article 75 TSO costs

Article 75A MCO costs (options in this article depend on options under II.1)

- Article 76 Costs of establishing, amending and operating single day-ahead and intraday coupling (proposed to be deleted)

No changes to articles:

Article 78 Costs of establishing and operating the coordinated capacity calculation process
Article 79 Costs of ensuring firmness

II.3 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 75						
* Article 75A						
* Article 76						

* II.3 Do you consider the reasoning for the amendment sufficient?

- No
 Neutral
 Yes
 No opinion

II.3 Please provide your (additional) consideration on the reasoning if necessary.

Eurelectric regrets that cost sharing issues could have delayed implementation of CACM 1.0 and hope new provisions will help for an efficient implementation.

II.3 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration						X
* Non-discrimination						X
* Effective competition						X
* Efficient functioning of the market						X

* II.3 Do you want to provide a different proposal?

Yes

No

I.3 Please write your amendment proposal and the reasoning in the table below.

	Amendment	Reasoning
Article 75		
Article 75A		
Article 76		
Article 78		
Article 79		

TITLE III - Capacity calculation

Chapter 1 - General requirements

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Amended/New articles:

Article 15 Capacity calculation regions

Article 15A General capacity calculation provisions Article 20 Capacity calculation approach

III.1 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 15						
* Article 15A						
* Article 20						

* III.1 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

III.1 Please provide your (additional) consideration on the reasoning if necessary.

Eurelectric welcomes the reasoning of ACER talking about third countries to be considered in CACM 2.0. We request that CACM 2.0 define a framework for their consideration in capacity calculation and congestion management.

III.1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration						X
* Non-discrimination						X
* Effective competition						X
* Efficient functioning of the market				X		

* III.1 Do you want to provide a different proposal?

Yes

No

III.1 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 15	2.d. A CCR shall group the borders of at least three Member States.	<p>Globally Eurelectric prefers this version of Article 15 but some clarifications/improvements are needed.</p> <p>2.c. Eurelectric requests ACER to clarify the reasoning and implication of Article 15(2c).</p> <p>2.d. Insofar as a part of the decisions on the CCRs can be taken unanimously by the regulators of the Member States, we consider that their number should be sufficient. Eurelectric proposes to add this as a requirement for a CCR.</p>
Article 15A		
Article 20	<p>2. All TSOs in each capacity calculation region may jointly request the competent regulatory authorities, as part of the proposal pursuant to Article 21(2), to apply the coordinated net transmission capacity approach in the concerned capacity calculation region if the TSOs concerned are able to demonstrate that flows on each bidding zone border assigned to this capacity calculation region are not significantly impacted by exchanges on other bidding zone borders within or outside this capacity calculation region.</p> <p>Market participants shall be</p>	<p>3. Eurelectric notices the deletion of Article 20(3). The clause concerning Italy / Switzerland in the capacity calculation methodology (Art. 20(3)) should be rewritten. If the Swiss constraints can be taken into account in the capacity calculation (as it is the case in CORE), a flow-based capacity calculation might be used in the CCR Italy-North</p> <p>2. A clause concerning the involvement of market participants should be added to Article 20 (2). Involvement of market participants in such assessment is critical.</p>

	involved in this assessment at least through a consultation process.	
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Chapter 2 - Capacity calculation methodologies

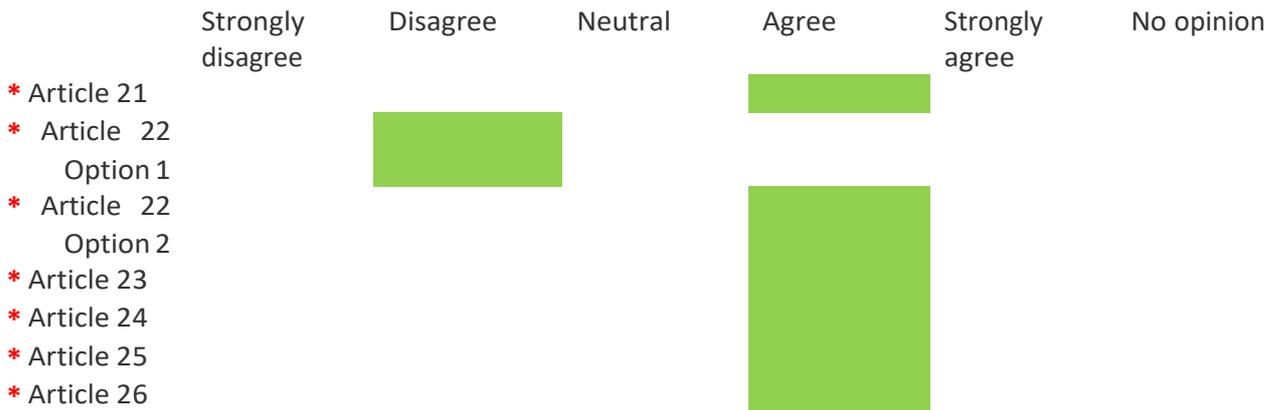
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Amended/New articles:

- Article 21 Capacity calculation methodology
- Article 22 Reliability margin methodology
 - Option 1 FRM per CNEC for both CNTC and FB
 - Option 2 TRM/NTC vs FRM/FB
- Article 23 Methodologies for critical network elements, contingencies and operational security limits
- Article 24 Allocation constraints
- Article 25 Generation and load shift keys methodology
- Article 26 Methodology for remedial actions in capacity calculation

III.2 What is your opinion on the proposed amendment?



* III.2 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

III.2 Please provide your (additional) consideration on the reasoning if necessary.

III.2 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration						X
* Non-discrimination						X
* Effective competition						X
* Efficient functioning of the market				X		

* III.2 Do you want to provide a different proposal?

- Yes
 No

III.2 Please write your amendment proposal and the reasoning in the table below.

	Amendment	Reasoning
Article 21	<p>2b. a detailed description of the capacity calculation approach which shall include the following: [...] [between (ii) and (iii)] rules for avoiding undue discrimination of cross-zonal exchanges on different borders within the same CCR, in different CCR or with third countries</p> <p>2b. a detailed description of the capacity calculation approach which shall include the following: [...] (viii) rules for optimizing Phase Shifter Transformers (PSTs) in the coordinated capacity calculation</p>	<p>2b. The rule for splitting capacities between different borders in the same CCR or not (cf. third countries) should be clarified in CACM 2.0. We propose to add a rule between (ii) and (iii).</p> <p>2b. An additional rule to take into account Phase Shifter Transformers (PSTs) shall be included as Article 21(2b viii)</p> <ul style="list-style-type: none"> - Eurelectric recalls that not only High Voltage Direct Current (HVDC) but also Phase Shifter Transformers (PSTs) should be included in the capacity calculation, in a coordinated manner to favour efficient capacity allocation and congestion management. - CACM GL should reckon the controllability feature of HVDC and PSTs and hence their role as Remedial Actions within a Capacity Calculation Methodology and in capacity allocation (Advanced Hybrid Coupling). - Eurelectric supports the use of Advanced Hybrid Coupling (AHC), allowing taking into account HVDCs as well as PSTs in the optimization algorithm, to improve the efficiency of allocation between CCRs. - The 70% threshold should be assessed with the

	<p>3. The capacity calculation methodology shall include the principles to comply with the minimum capacity target set at the minimum level of available capacity for cross-zonal trade pursuant to Article 16(8) of Regulation 2019/943 as modified according to the action plans pursuant to Article 15 of Regulation 2019/943 or the derogations granted by the regulatory authorities pursuant to Article 16(9) of Regulation 2019/943. This should not impede TSOs to trigger the remedial actions when necessary to maintain the transmission system within operational security limits.</p> <p>5. All TSOs in each capacity calculation region shall ensure that cross-zonal capacity is recalculated within the intraday market time-frame based on the latest available information, including the information resulting from the process described under the methodology developed pursuant to Article 75 of Regulation 2017/1485. [...] Further regionally coordinated recalculations not linked to specific intraday implicit auctions are allowed, provided that the capacity calculation output are directly sent to the continuous trading once available. Whenever possible, TSOs shall apply regional coordinated recalculations and send the capacity calculation output directly to the continuous trading once available.</p>	<p>most favourable setting of the HVDCs and PSTs considered in the coordinated capacity calculation and allocation.</p> <p>3. Eurelectric requests that adding the principle to comply with the 70% constraint should not impede TSOs to trigger the remedial actions when necessary to maintain the transmission system within operational security limits.</p> <p>5. Speaking about the capacity calculation in ID, a clarification of the articulation between ID auctions and the Redispatch & Countertrading process is required, so that CACM would be consistent with the SO GL Art. 75-78 concerning the regional operational security coordination, cf. Coordinated Regional Operational Security Assessment (CROSA).</p> <p>5. Eurelectric is more demanding in terms of capacity updates (they should be made mandatory and not only allowed).</p>
Article 22 Option 1		
Article 22 Option 2		
Article 23	1. The common capacity calculation methodology shall	1. Eurelectric calls for the inclusion of a rule to select CNECs (critical network elements and

	<p>include a methodology to define the critical network elements to be considered while determining the cross-zonal capacity. The methodology shall specify the rule to select critical network elements and constraints, cross-border and internal with proven cross-border impact.</p> <p>[Add a paragraph between 1. and 2.] The methodology shall include the rules for the calculation of operational security limits.</p>	<p>constraints, cross-border and internal with proven cross-border impact), as stated for example in the CORE capacity calculation methodology. Rule on the calculation of operational security limits should also be included in the revision.</p>
Article 24	<p>2. Each TSO proposing to use allocation constraints pursuant to paragraph 1(a) shall justify their necessity within the common capacity calculation methodology, by complementing it with a cost-benefit analysis. Such an analysis shall prove that allocation constraints are the economically most efficient measure among all alternatives to address related operational security issues. This analysis shall be repeated every three years and submitted to regulatory authorities of the concerned capacity calculation region which shall decide whether allocation constraints can continue to apply. The cost-benefit analysis methodology has to be based on a generic European methodology validated by the Agency. In addition, the methodology shall be made available to all market</p>	<p>1. Eurelectric considers that the allocation constraints should be defined by their nature and not by the objective pursued. Provisions of 1 (a) and (b) should characterize more specifically the types of allocation constraints. In (a) constraints on net positions between Bidding Zones; and (b) constraints applied to interconnectors (ramps, HVDC, losses, etc.).</p> <p>2. Eurelectric requests for an EU methodology for the cost-benefit analysis of the allocation constraints and a validation by ACER. This methodology should be made available for the sake of transparency to all market participants to the concerned CCRs.</p>

	participants of the concerned CCRs.	
Article 25	3. A periodical assessment of the GLSK methodologies selected by each TSO across Europe has to be performed in order to ensure their relevance. The Agency is formally responsible for this assessment and shall guide TSOs.	3. Eurelectric requests for a periodical assessment of the GLSK methodologies selected by each TSO across Europe.
Article 26		

Chapter 3 - Capacity calculation process

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Amended/New articles:

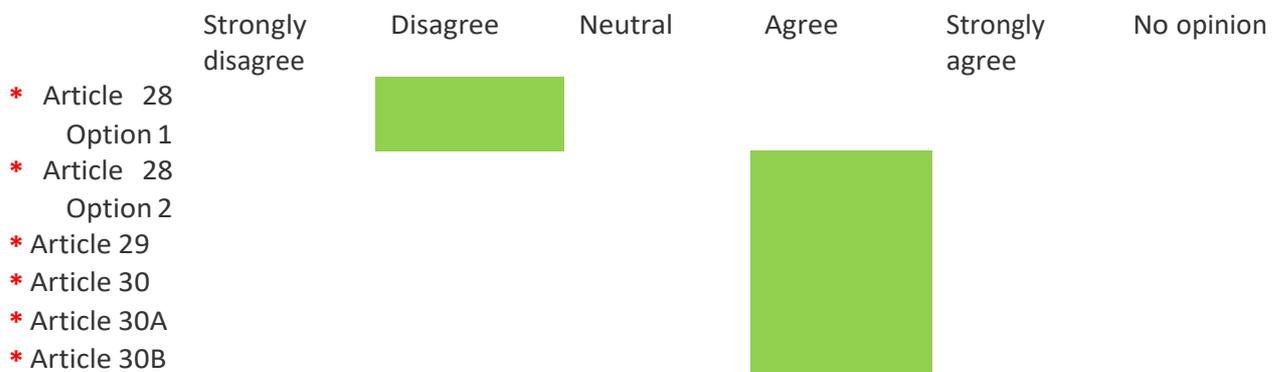
Article 28 Regional calculation of cross-zonal capacity

Option 1 Proposal including minRAM/70%+CTNC built on FBOption 2 Only general 70% requirement

Article 29 Coordinated validation of cross-zonal capacity Article 30 Individual validation of cross-zonal capacity Article 30A Delivery of cross-zonal capacity

Article 30B Reports about validation

III.3 What is your opinion on the proposed amendment?



* III.3 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

III.3 Please provide your (additional) consideration on the reasoning if necessary.

III.3 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration						X
* Non-discrimination						X
* Effective competition						X
* Efficient functioning of the market				X		

* III.3 Do you want to provide a different proposal?

Yes

No

III.3 Please write your amendment proposal and the reasoning in the table below.

	Amendment	Reasoning
Article 28 Option 1		
Article 28 Option 2	1. For each capacity calculation time-frame, each TSO shall provide the regional coordination centres in the capacity calculation region with the following inputs: operational security limits, critical network elements and contingencies, generation and load shift keys, remedial actions, reliability margins, allocation constraints , previously allocated cross-zonal capacity and common grid models .	For sake of clarity, capacity calculation inputs and outputs Article 28(1) and 28(9) should be written in a separate Article XX.” 1. Allocation constraints are still listed as an input of regional calculation of capacity whereas according to ACER reasoning and Article 28(9), there are now included in the cross-zonal capacity calculation outputs. A general check of the mention of allocation constraints within CACM is needed no to imply contradictory provisions. 1. Common grid models should also be included among the inputs to the capacity calculation. 6-7. Eurelectric prefers option 2 because capacity calculation should remain adapted to regional specificities. Applying Flow-Based and 70% on every border may lead to frequent poorly-transparent reductions for operational security reasons.
Article 29		
Article 30		
Article 30A	Each regional coordination centre shall provide the validated cross-	Amendment to include reference to Article 28

	zonal capacity calculation outputs pursuant to Article 28 for the purposes of allocating capacity in accordance with Articles 46 and 58.	
Article 30B		

TITLE IV Part 1 - Market coupling

Chapter 1 - Market coupling development

Section 1 - General requirements

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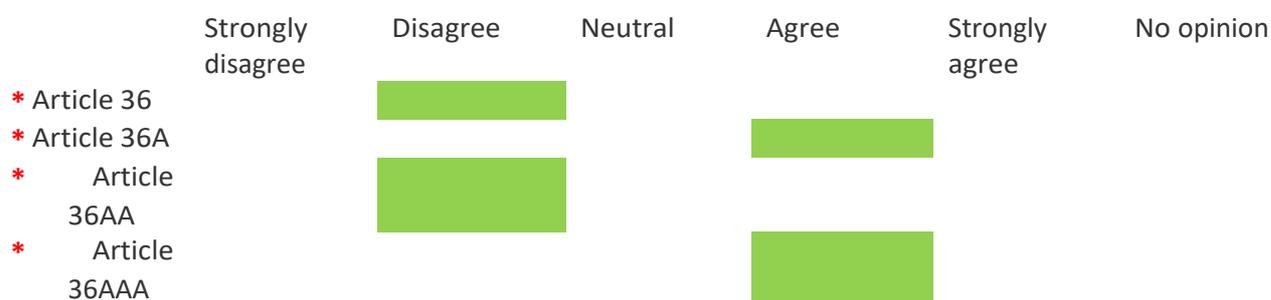
Amended/New articles:

Article 36 General provisions

Article 36A Pricing of cross-zonal capacity Article 36AA Algorithm objectives

Article 36AAA Firmness of day-ahead and intraday capacity

IV.1.1 What is your opinion on the proposed amendment?



* IV.1.1 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

* IV.1.1 Please provide your (additional) consideration on the reasoning if necessary.

Non-uniform pricing introduction/more details needed/major possible implications for market participants

In our understanding, ACER proposes to introduce in CACM 2.0 the possibility of a new methodology based on non-uniform pricing for DA and ID market coupling at the European level. Eurelectric would like first to highlight that the information given by ACER on non-uniform pricing models is very poor and difficultly understandable as it is introduced in CACM 2.0, in particular having no clear definition or description of this concept not yet defined in any European regulation or methodology.

Eurelectric requests ACER to provide a clear definition and description of non-uniform pricing, and in particular the way the side-payments would be calibrated and the way the DA and ID market prices per bidding zone would be computed. Indeed, Eurelectric is very concerned since depending on its design, such a method can have major impacts for market participants because :

- We understand that side-payments (uplifts and down-lifts) are introduced to compensate paradoxically-accepted orders, which, depending on the approach design, can be financed either by the participants to the DA and ID markets, or by an external budget (e.g. of the MCO function/the network tariff). The latter is the option a priori favoured by Eurelectric.
- The impact on the computation of congestion rent should be clarified.

- Such an approach can have an impact on the significance and levels of ID and DA market prices, whereas DA market prices are used as reference for the settlement of financial flows of forward products and as an index for a major part of electricity contracts, and thus on forward products levels and hedging strategies for producers and consumers/retailers.

Consultation process/stakeholder involvement/dedicated workshop to be organized

Eurelectric regrets that stakeholders have not been consulted by ACER on this topic before this consultation on CACM 2.0 (for example, in the scoping phase on the consultation, in which this change was not announced). Changing the pricing methodology is a critical and a heart topic in itself, for which all stakeholders should have been consulted before/separately CACM revision. This remarks meets the general request for more transparency on the priorities/choices by the MCO function for market coupling algorithms.

Eurelectric recognizes the challenges raised by SDAC and SIDC algorithm performance in a context where it will have to deal with an increasing complexity. Eurelectric is thus open to alternative pricing methodologies that would help handling such a complexity while keeping a limited computation time. However:

- Among alternative pricing methodologies, non-uniform pricing model is not the only solution. Other alternative solutions should not been ruled out too rapidly, as for example uniform pricing models with divisible blocks with different acceptance ratio.
- Eurelectric would like to stress that allowing more time for the algorithm runs (which is currently only around 10 minutes for SDAC) is another or complementary solution that should be considered too.
- It should be considered to differentiate the solutions chosen for the SDAC and SIDC algorithms, since the algorithm performance (computational time) is a priori much constraining in ID than in DA.
- Guarantees in terms of algorithm performance should be provided if the non-uniform pricing solution were to be developed, in particular, Eurelectric requests the insurance that it will handle an increasing diversity and complexity of products, allowing a better representation, pricing and trading of assets on DA and ID markets.

Eurelectric asks for a more-informed debate with ACER and all concerned stakeholders, through a dedicated workshop on the solutions to address the challenges of the SDAC and SIDC algorithm performance and the possible alternative pricing methodologies including non-uniform pricing. Eurelectric requests the publication of all assessment studies that have been done so far on computational time / algorithm performance when using non-uniform pricing in comparison with current or alternative solutions.

Answer to ACER questions in the reasoning:

i. the consequences of uplifts slightly deviating from the uniform clearing price and the impact on the usage of the DA prices as forward-looking hedging products?

DA market prices are not only the reference prices for the settlement of forward products used for hedging but also used as an index for a major part of electricity contracts. The consequences depend on the impact in terms of DA price levels and volatilities. If the impact is non negligible, the consequences could be detrimental for market participants and for the global efficiency of the DA and ID markets in terms of zonal price formation and market functioning. Moreover, Eurelectric asks that the calculation methodology of the zonal DA and ID prices in output of non-uniform pricing model should be transparent as the way to calibrate the uplifts/downlifts.

ii. The fairness of uplifts in general and more specific in comparison to the current design with Paradoxically Rejected Blocks.

Eurelectric asks for the achievement and publication by the MCO function of a thorough study to assess the impact and efficiency of non-uniform pricing in comparison to the existing current approach on the levels of DA and ID bidding zone market prices, number of paradoxically accepted orders, and uplifts/down-lifts to be paid/received (impact for all stakeholders). According to Eurelectric, uplifts/down-lifts should be taken in charge by the budget of the MCO function/the network tariff or if they are to be paid by market participants, explicit guarantees on the amount of side-payments should be set (cf. formulation in current proposal which is “minimal use of uplift” is not sufficient).

iii. The balance between introduction of uplift vs the impact on algorithm performance (when introduction uplifts would allow higher welfare and better performance of the SDAC in the long run)

Eurelectric cannot comment this as long as we have neither the visibility on the assessment studies that have been done so far on computational time / algorithm performance when using non-uniform pricing, nor a description of the way the uplifts would be calibrated and financed. Cf. also the comments above.

IV.1.1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration		X				
* Non-discrimination						X
* Effective competition						X
* Efficient functioning of the market		X				

* IV.1.1 Do you want to provide a different proposal?

- Yes
 No

IV.1.1 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 36	1(b) SIDC for the intraday timeframe, consisting of intraday continuous trading, which may be complemented by intraday auctions, with no more than three auctions per day at 3 p.m. DA, 10 p.m. DA and 10 a.m. ID	1(b) Shall they be introduced, Eurelectric requests to use the same formulation as in Electricity Regulation Article 16(5) for the introduction of intraday auctions. Eurelectric notes that ID auctions are introduced for SIDC, keeping also the ID continuous trading. - Eurelectric still considers continuous trading to be the main solution for intraday trade. - Eurelectric has systematically questioned the practical interest of IDAs as a solution to improve the efficiency of capacity allocation

		<p>and congestion management. In particular, in bidding zones with low liquidity, the co-existence of two mechanisms (continuous market and auctions) can have detrimental effects.</p> <ul style="list-style-type: none"> - Eurelectric, therefore, wants to remind ACER that the design of IDAs must preserve ID market liquidity, typically by shortening the interruptions of the continuous market as much as possible. - Eurelectric requests that the number of ID auctions remains limited and that CACM GL mentions explicitly that there will not be more than three ID auctions at 3 p.m. DA, 10 p.m. DA and 10 a.m. ID. - Eurelectric proposes the introduction of a regular review/assessment of the implementation of ID auctions. Such a review should analyse the effects of IDAs in terms of efficiency, cross-zonal capacity allocated, and impact on the liquidity of the continuous SIDC. The assessment should result in the publication of an annual report based on relevant indicators to demonstrate improvements in congestion management and capacity allocation; as well as to challenge the number of auctions. <p>CACM GL should state that the number of ID auctions is to be reduced if the annual report shows limited improvements in congestion management, capacity allocation or detrimental impact on the liquidity, following their introduction.</p>
	<p>2. The Agency shall publish an annual monitoring report on the assessment of the implementation of ID auctions. Such a report shall analyze the effects of IDAs in terms of efficiency, cross-zonal capacity allocated, and impact on the liquidity of the continuous SIDC. The assessment shall result in the publication of a report based on relevant indicators to demonstrate improvements in congestion management and capacity allocation; as well as to challenge the number of auctions. Based on this monitoring report, the Agency may decide to reduce the number of ID auctions or revise the timings of ID auctions.</p>	<p>2. Eurelectric proposes an additional clause as an amendment proposal on the introduction of an IDA monitoring.</p>
Article 36A	<p>2. In intraday continuous trading, the available cross-zonal capacity shall be allocated at a zero price on a first come first serve basis.</p>	<p>2. Specific mention of ‘intraday continuous trading’ instead of just ‘continuous trading’</p>
Article 36AA		<p>See Eurelectric comments on introduction of non-</p>

	<p>1(c)(iii) and geographical extensions of SDAC</p> <p>2. The intraday continuous trading algorithm</p> <p>3(c)(iii) and geographical extensions of SDAC</p>	<p>uniform pricing above in answer to question IV.1.1.</p> <p>1(c)(i) The definition of uniform pricing is needed. In addition, in Article 36A(1)(c)(i), the formulation is unclear with the use of “or” between a. and b. and the fact that (1)(c)(i)-b. makes no sense since it seems to correspond to a non-uniform pricing.</p> <p>Why has the mention of “larger or smaller number of bidding zones” disappeared?</p> <p>1(c)(iv) Repeatability could be the objective, even if experience has shown that it is an impossible feature of the algorithm</p> <p>2. Specific mention of ‘intraday continuous trading algorithm’ instead of just ‘continuous trading algorithm’</p> <p>In Article 36A(3)(c)(i), the formulation is unclear with the use of “or” between a. and b. and the fact that (3)(c)(i)-b. makes no sense since it seems to correspond to a non-uniform pricing.</p> <p>Why has the mention of “larger or smaller number of bidding zones” disappeared?</p>
Article 36AAA		

Section 2 - Terms and conditions or methodologies on algorithm development

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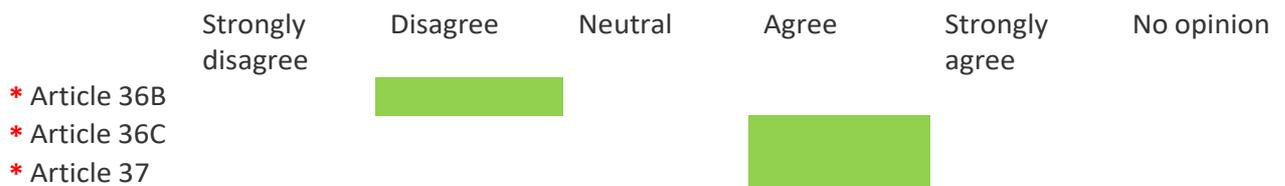
[210413 PC AM IV.1.2 TCMs on Algo development final.pdf](#)

Amended/New articles:

Article 36B Products accommodated

Article 36C Harmonised technical price limits Article 37 Algorithm methodology

IV.1.2 What is your opinion on the proposed amendment?



* IV.1.2 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

* IV.1.2 Please provide your (additional) consideration on the reasoning if necessary.

IV.1.2 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration		X				
* Non-discrimination		X				
* Effective competition		X				
* Efficient functioning of the market		X				

* IV.1.2 Do you want to provide a different proposal?

- Yes
- No

IV.1.3 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 36B	<p>[add a paragraph between 1. and 2.] The algorithms for the SDAC, the intraday continuous trading and the intraday auctions have to consider as mandatory the accommodation of both simple and complex products, when they are traded in more than three Member States.</p>	<p>Eurelectric is very concerned in terms of possible step back on the products accommodated by the algorithms. The priority for products accommodation should be to keep an efficient pricing and trading of the products/assets in the European target models available, providing thus an efficient DA and ID market price formation. In particular, in self-dispatch model widely used in Europe, the optimization under the portfolio-based approach implies the use of complex products as linked, exclusive and loop block products to provide a good representation of the assets.</p> <p>Eurelectric considers that the set of complex products already handled by the SDAC algorithm is necessary to allow for an efficient price formation in the day-ahead time frame, while complying with all specific rules at national level. As long as current national rules applying to the day-ahead auctions remain, any step back in terms of complex products can harm significantly price formation across Europe and the efficiency of investment and dispatch decisions.</p> <p>More generally, Eurelectric requests an assessment of the computational time of the algorithm when integrating all the complexity of the products together with the 15 minutes ISP, to be able to help choosing if some products should be made optional or not. Indeed, another solution that could be considered is to allow more time for the algorithm runs (which is currently around 10 minutes for SDAC).</p> <p>A trade-off has to be found between, on the one hand a growing complexity to be handled by the algorithms (e.g. complex products, 15 minutes ISP) and on the other hand, overall simplification allowing to decrease computational time but altering the efficiency of the market to a large extent.</p> <p>Eurelectric proposes to add a paragraph specifying the rule for a mandatory accommodation of both simple and complex products as soon as they are traded in a sufficient number of Member States, typically more than three.</p>
Article 36C		

Article 37	5. The algorithms implementation and development of new functionalities should be conditioned to the demonstration that new releases do not lead to a step back in terms of products traded by more than three Member States in 2021.	5. Eurelectric proposes to add a paragraph to stress the importance of no stepping back in terms of products traded for the implementation of new functionalities.
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Section 3 - Terms and conditions or methodologies on market coupling operation

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Amended/New articles:

Article 36E Day-ahead timings and procedures Article 36F Intraday timings and procedures

IV.1.3 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 36E						
* Article 36F						

* IV.1.3 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

IV.1.3 Please provide your (additional) consideration on the reasoning if necessary.

IV.1.3 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration				X		
* Non-discrimination						X
* Effective competition						X

* Efficient functioning of the market



* IV.1.3 Do you want to provide a different proposal?

- Yes
- No

IV.1.3 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 36E	2(a) SDAC GOT, which should be at the least 1h before SDAC GCT	2. Eurelectric requests ACER to clarify why the previous provision in CACM 1.0 Article 14(1) "The day-ahead market gate opening time shall be at the latest 11:00 market time day-ahead." is removed.
Article 36F	7. In order to accommodate intraday auctions, the cross-zonal capacity allocation within the continuous trading for a given market time unit shall be suspended for a limited time period of no more than 10 minutes to prevent parallel cross-zonal capacity allocation in the continuous trading and intraday auctions. [add a paragraph between 9. and 10.] All available CZ exchange capacity should be allocated by the TSOs from the IDCZGOT, until the IDCZGCT viewed in paragraph 1.	7. Eurelectric welcomes the initiative to limit the continuous trading interruptions and to make the distinction between the interruption time dedicated to capacity allocation and ID market coupling. Eurelectric requests a 10 minutes maximum interruption dedicated to capacity allocation.

TITLE IV Part 2 - Market coupling

Chapter 2 - Single day-ahead coupling

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Amended/New articles:

Article 39 Inputs in the SDAC algorithm

Article 39A Results of the price coupling algorithm

IV.2 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 39						
* Article 39A						

* IV.2 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

IV.2 Please provide your (additional) consideration on the reasoning if necessary.

IV.2 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration				X		
* Non-discrimination						X
* Effective competition						X
* Efficient functioning of the market				X		

* IV.2 Do you want to provide a different proposal?

- Yes
- No

IV.2 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 39		
Article 39A		

Chapter 3 - Single intraday coupling

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Amended/New articles:

Article 58 Provision of input data

Article 58A Results of the continuous trading matching algorithm Article 63B Provision of input data

Article 63F Results of the intraday auction algorithm

IV.3 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 58						
* Article 58A						
* Article 63B						
* Article 63F						

* IV.3 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

IV.3 Please provide your (additional) consideration on the reasoning if necessary.

IV.3 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration				X		
* Non-discrimination						X
* Effective competition						X
* Efficient functioning of the market				X		

* IV.3 Do you want to provide a different proposal?

- Yes
- No

IV.3 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 58		
Article 58A		
Article 63B		
Article 63F		

Chapter 4 - Post-coupling activities

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Amended/New articles:

Article 67A Methodology for calculating scheduled exchanges resulting from single day-ahead coupling and single intraday coupling

Article 68 Clearing and settlement

Option 1 Clearing and settlement on each NEMO Option 2 Clearing and settlement on MCO

Article 68A NEMO balance responsibility

Option 1 Balance responsibility on each NEMO

Option 2 Balance responsibility (cross-border) on MCO

Article 72 Firmness in the event of force majeure or emergency situations Article 73 Congestion income distribution

Option 1 CID on each TSO Option 2 CID on MCO

Article 77 (proposed to be deleted)

IV.4 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion	Answer7
* Article 67A							
* Article 68 Option 1							
* Article 68 Option 2							
* Article 68A Option 1							
* Article 68A Option 2							
* Article 72							
* Article 73 Option 1							
* Article 73 Option 2							
* Article 77							

* IV.4 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

IV.4 Please provide your (additional) consideration on the reasoning if necessary.

IV.4 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration						<input checked="" type="checkbox"/>
* Non-discrimination						<input checked="" type="checkbox"/>
* Effective competition						<input checked="" type="checkbox"/>
* Efficient functioning of the market						<input checked="" type="checkbox"/>

IV.4 Do you want to provide a different proposal

- Yes
- No

IV.4 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 67A		
Article 68 Option 1		
Article 68 Option 2		
Article 68A Option 1		
Article 68A Option 2		
Article 72		
Article 73 Option		

1		
Article 73 Option		
2		
Article 77		

TITLE V - Bidding zone review process

Chapter 1 - Bidding zone review process

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Amended/New articles:

Article 32 Reviewing existing bidding zone configurations Article 33 Criteria for reviewing bidding zone configurations

V.1 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 32	█					
* Article 33		█				

* V.1 Do you consider the reasoning for the amendment sufficient?

- No
 Neutral
 Yes
 No opinion

V.1 Please provide your (additional) consideration on the reasoning if necessary.

Eurelectric does not agree with several paragraphs introducing new provisions with respect to Electricity Regulation Article 14 and with a general lack of stakeholder involvement.

- Eurelectric does not agree introducing provisions on BZR process modifying or conflicting those in ER, whereas in its proposal, ACER rewrites the entire BZR process. On this topic, provisions in ER Article 14 were agreed as an output of the Clean Energy Package debate and Eurelectric considers CACM should not change the compromises reached in 2019.
- Eurelectric asks ACER to make sure that CACM GL do not pick up text passages of the Electricity Regulation leading to misunderstanding and inconsistency, but rather cross-refer to the relevant articles in ER in case of need. Eurelectric notices that several times, "copy-pasting" from ER Article 14 is used while deleting/adding/modifying some set of words, which leads to misunderstanding: is it the intention of ACER to change the content of ER?
- The involvement of concerned market participants is only at the end of the process, whereas Eurelectric has always requested more transparency and stakeholder involvement at each stage of the BZR process, in particular upstream of critical decisions.

V.1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration						█

- * Non-discrimination
- * Effective competition
- * Efficient functioning of the market

* V.1 Do you want to provide a different proposal?

- Yes
 No

V.1 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 32	<p>1(d) [...] This shall be assessed after a consultation including NRAs and TSOs concerned, at least in neighbouring countries.</p> <p>2. The rules and processes to be followed for Member States where structural congestion has been identified are the one described in Article 14(7) of Regulation 2019/943.</p> <p>5. [...] after a public consultation</p> <p>6.a.(i) : The participating TSOs shall develop a proposal for the methodology and assumptions to be used for the specific bidding zone review. Such a proposal shall be in line with the methodology foreseen take into duly account the methodology and assumptions developed according to in Article 14(5) of Regulation 2019/943.</p> <p>6.a.(iii) [...] and a consultation open to all concerned stakeholders has to be held</p>	<p>1. Eurelectric recall that there is a need for more stakeholder involvement at each stage of the BZR process: in particular, in the preparation of the ENTSO-E technical report.</p> <p>An amendment is needed so that the “negligible impact” assessment is agreed with concerned NRAs and TSOs.</p> <p>2. Paragraph 2 corresponds to a copy-paste of Electricity Regulation Article 14(7) with some slight changes. A general cross-reference to ER Article 14(7) should be used instead. The paragraph 2 shall be amended as suggested here.</p> <p>5. A public consultation is needed.</p> <p>With the formulation in 6.a.(i), there is a room for different approaches or even new approaches possibly developed, whereas Eurelectric considers the reference should be the European methodology. This reads like an additional methodology to the ACER methodology already developed. At least the methodology and assumptions should be compliant with the methodology foreseen in Article 14(5).</p> <p>6. a. (iii). A consultation of all stakeholders should be held as well in this first step.</p>

<p>6.a.(v) [...] the Agency shall, within additional three months, adopt a decision on the methodology and assumptions and the alternative bidding zone configurations to be considered, using the methodology foreseen in Article 14(5) of Regulation 2019/943.</p> <p>[add an item between 6.b.(iii) and (iv)] consult an advisory stakeholder committee including representatives of concerned stakeholders, market participants and Member States for each critical decision</p> <p>7. On receiving the joint proposal to maintain or to amend the bidding zone configuration in accordance with paragraph 6(b)(iv), the relevant Member States or their designated competent authorities shall within six months reach an agreement on the proposal to maintain or amend the bidding zone configuration. The decision shall be reasoned and shall be notified to the Commission and the Agency. In the event that the relevant Member States fail to reach a unanimous decision within six months, they shall immediately notify the Commission. The rules and process for those Member States that have opted to amend the bidding zone configuration pursuant paragraph 2 are detailed in ER Article 14(8). As a measure of last resort, in the cases mentioned in ER Article 14(8), the Commission after consulting the Agency, shall adopt a decision whether to amend or maintain the bidding zone configuration within six months after receipt of such a notification.</p> <p>8. Member States or their</p>	<p>6.a.(v) It should be clarified in (v) that this should be ACER method foreseen in ER 14(5) and not another one.</p> <p>6.b.(ii) and (iii) A consultation on the final outcome and a dedicated workshop is not sufficient, more stakeholder involvement for example through dedicated forums is requested all along the BZR process, in particular for critical decisions associated to the BZR.</p> <p>7. Eurelectric does not agree with Paragraph 7, which means that every three years there would be for EC the possibility to change the BZ configuration. Here a partial copy-paste of ER Article 14(8) is used by ACER. With this formulation, this includes provisions about decision-making going further than those in ER whereas those were largely debated during the CEP on ER. Eurelectric does not agree to include new provisions w.r.t those in ER. The choice for a BZ configuration change in a MS is under the prerogative of the concerned MS. EC decision to change bidding zone configuration should be limited to the cases mentioned in ER Article 14(8) and new borders (if any) should be within the respective Member States. However, if ACER wants to complete ER, Eurelectric agrees that ACER could clarify the framework when and what EC can decide about a change in BZ configuration. In our understanding this is limited to merging BZ and adding borders due to structural congestions.</p> <p>8. Replace “under paragraph 7 by “under ER Article 14” (to be consistent with ER Article 14(9)).</p>
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	<p>designated competent authorities and the Commission shall consult relevant stakeholders before adopting a decision under Electricity Regulation Article 14. Other Member States may submit comments to the relevant Member States, who should take account of those comments when reaching their decision.</p> <p>9. Any decision adopted by relevant Member States or by their designated competent authorities or by the Commission pursuant to Electricity Regulation Article 14 shall specify the date of implementation of any changes to the BZ configuration. That implementation date shall balance the need for expeditiousness with practical considerations, including forward trade of electricity. The decision may establish appropriate transitional arrangements.</p>	<p>9. Replace “pursuant to paragraph 7 by “pursuant to ER Article 14” (to be consistent with ER Art 14(10)). Delete “to the BZ configuration”.</p>
Article 33		<p>Eurelectric regrets the lack of evolutions in the sense of the efficiency via additional criteria already mentioned by Eurelectric to ACER. Again, as mentioned for Article 32, cross-references to ER should be better used instead of (partial) copy-pasting of ER.</p> <p>In the context of the ambitious EU offshore wind strategy relying notably on hybrid offshore projects, we believe that the BZR process should be improved to correctly consider the development of these projects.</p> <ul style="list-style-type: none"> - The Bidding Zone Review process can play a role in the determination (and potential evolution) of the market arrangements that will be applied for offshore hybrid projects. - The offshore investment is a long-term activity (20 years and more) and the development of hybrid offshore projects requires stable long terms price signals, while the timeframe of the BZR is rather short-term. This prevents the Bidding Zone Review, in its current setup, to play an instrumental role in the determination and evolution of bidding zones delineation around offshore

	<p>1. The principles for bidding zone design are defined in Electricity Regulation Article 14(1), in particular, configuration of bidding zones in the Union shall be designed in such a way as to maximise economic efficiency and to maximise cross-zonal trading opportunities in accordance with Article 14(1)16 of Regulation (EU) 2019/943, while maintaining security of supply.</p> <p>2. The configuration of the bidding zones shall be assessed on the basis of its ability to create a reliable market environment, including for flexible generation and load capacity, which is crucial to avoiding grid bottlenecks, balancing electricity demand and supply, securing the long term security of investments in generation and network infrastructure. The principles for bidding zone review and assessment are defined in Electricity Regulation Article 14(3).</p>	<p>hybrid projects.</p> <ul style="list-style-type: none"> - For offshore hybrid projects, a Bidding Zone delineation stability is needed given its impact on the market revenues of, notably, offshore generation and transmission assets but also onshore market participants. <p>1. This is a partial copy-paste of ER Article 14(1) and reference to Article 16 or to this Regulation on cross-zonal capacity allocation and congestion management is missing.</p> <p>2. This is a partial copy-paste of ER Article 14(3). Eurelectric asks for a clarification why ACER just added “generation” w.r.t. the text in ER Article 14(3) “securing the long-term security of investments in network infrastructure”</p> <p>3. The present CACM criteria regarding BRZ should have been challenged. According to Eurelectric, some are key, others irrelevant and some others should be added.</p> <ul style="list-style-type: none"> • The BZR should be pursued as a multi-criteria study, including both quantifiable and qualitative criteria, monetized or not. Indeed, it is all the more important to keep multiple criteria, as many aspects still cannot be monetized and may be subject to different interpretations by stakeholders and MSs. • At least those criteria listed in the CACM GL should be taken into account for BZR. • Eurelectric believes that relevant criteria are those that proved their impact in bidding zone reviews; criteria that were not impacted by BZR should not be maintained.
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	<p>3.b.(iii). transaction and transition costs, including the cost of amending existing contractual obligations incurred by market participants, NEMOs and TSOs and the calculation of stranded costs associated with a configuration change for merchant assets</p> <p>OR</p> <p>[add an item after 3.b.(iii)] the level of economic redistribution among market participants across different bidding zones</p> <p>3.c.(ii). the need for bidding zones to be consistent for all capacity calculation time-frames, as foreseen in RR Art. XX</p> <p>4. A bidding zone review in accordance with Article 32 shall include scenarios which take due account of tangible progress on</p>	<ul style="list-style-type: none"> • According to Eurelectric, key criteria are the following: “economic efficiency”, “market liquidity”, “accuracy and robustness of price signals”, “transaction and transition costs” and “stability and robustness over time”. • In addition, future grid development needs to be considered in BZR with a long-enough time horizon in order to avoid short-term bidding zone changes that cause market distortions. • The criteria “network security” – see Art. 33(1)(a) – should be a given for all calculations. It is difficult to understand why this should differ depending on the bidding zone configuration. • Eurelectric also believes that many other criteria should be considered: market simplicity, the effect on operational complexity, balancing resource provision in each BZ, consistency/stability of investment signals, legal feasibility, price equalization, technical feasibility <p>3.b.(iii). Eurelectric considers that the so-called criterion “transition costs” should be clarified. If understood as the amount of potential stranded costs associated with a configuration change, it should be a major dimension in the bidding zone review. Indeed, a change of bidding zone configuration can have a dramatic impact on market fundamentals, influencing to a very large proportion the value of price-sensitive assets: for example, if a single bidding zone encompasses the two ends of a merchant line, then its market value drops virtually to zero. The fact that bidding zone configuration can change is per se a regulatory risk that is very difficult to anticipate for investors and the financial risks leads to additional investment costs. Eurelectric thus requests ACER to introduce the calculation of stranded costs for merchant assets in the criteria needed in BZR (either by clarifying the meaning of transaction costs or by adding new criteria).</p> <p>More generally, Eurelectric asks ACER to consider in BZR the level of economic redistribution among market participants across different bidding zones. The potential loss of welfare in every bidding zone should be assessed and taken into consideration.</p> <p>3.c.(ii). Eurelectric does not understand the deletion of the Article 3.c.(ii). This mention should be kept. If it is already included as a regulatory requirement, a cross-reference to the relevant text could be added for sake of clarity.</p>
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<p>infrastructure development projects that are expected to be realised within the three years starting from the year following the year in which the decision to launch the review was taken, taking into consideration the expected development outline in the Ten-Year Network Development Plan (TYNDP) of ENTSO-E. A sensitivity analysis shall include scenarios with longer time horizon, typically ten years using assumptions from the TYNDP.</p>	<p>4. Eurelectric regrets this choice for a 3 years horizon which seems too short for the assessment performed in the BZR. It would have been better to keep 10 years in consistence with the TYNDP. At least the TYNDP should be mentioned, and complementary scenarios shall be used up to a 10 years horizon.</p>
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TITLE VI - Reporting and implementation monitoring

Chapter 1 - Reporting

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[210413_PC_AM_VI.1_reporting_final.pdf](#)

Amended/New articles:

Article 31 Biennial report on capacity calculation and allocation

Article 34 Regular reporting on current bidding zone configuration by ENTSO for Electricity

- Option 1 Includes threshold for reporting on physical congestion
- Option 2 No explicit threshold

VI.1 What is your opinion on the proposed amendment?

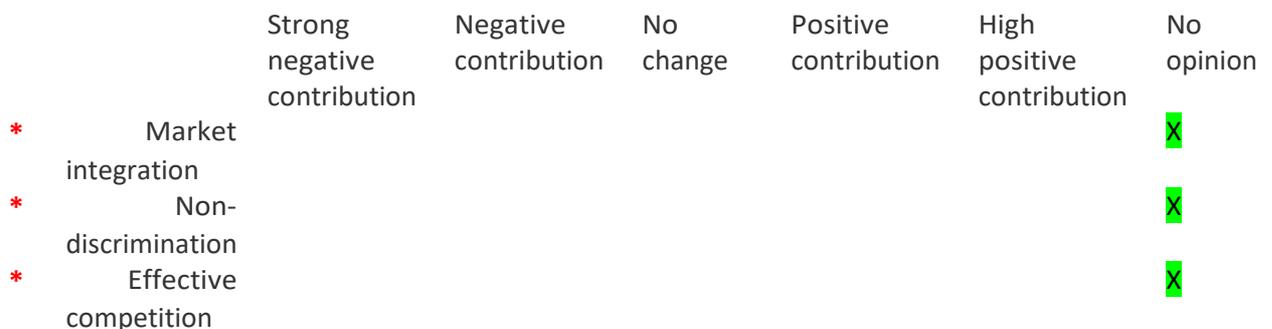


* VI.1 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

VI.1 Please provide your (additional) consideration on the reasoning if necessary.

VI.1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?



* Efficient functioning of the market



* VI.1 Do you want to provide a different proposal?

- Yes
- No

VI.1 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 31		
Article 34 Option 1		
Article 34 Option 2	2(e) [...] and detailing volumes and costs associated on network congestions subjected to national action plans	We prefer this option, with no explicit threshold. We propose to add the details for those having national action plans.

Chapter 2 - Implementation monitoring

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[210413 PC AM VI.2 Implementation monitoring final.pdf](#)

Amended/New articles:

Article 82 Monitoring of the implementation of single day-ahead and intraday coupling

VI.2 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 82						

* VI.2 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

VI.2 Please provide your (additional) consideration on the reasoning if necessary.

How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration				X		
* Non-discrimination				X		
* Effective competition				X		
* Efficient functioning of the market				X		

* Do you want to provide a different proposal?

- Yes
- No

Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 82	2. Monitoring of the implementation of single day-ahead and intraday coupling, including ID auctions by ENTSO for Electricity in accordance with Article 31(1) of regulation (EC) No 943/2019 [...]	See the request for a monitoring of the introduction of ID auctions at EU level, cf. part IV.1.1 Article 36.

TITLE VII - Transitional and final provisions

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[210413 PC AM VII Final and transitional provisions final.pdf](#)

Amended/New articles:

Article 83 Transitional provisions Article 84 Entry into force

VII What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 83						
* Article 84						

* VII Do you consider the reasoning for the amendment sufficient?

- No
- Neutral
- Yes
- No opinion

VII. Please provide your (additional) consideration on the reasoning if necessary.

VII. How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration						X
* Non-discrimination						X
* Effective competition						X
* Efficient functioning of the market						X

* VII Do you want to provide a different proposal?

- Yes
- No

VII Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 83		1. Eurelectric agrees that in case ID auctions are implemented, complementary regional ID auctions should be prohibited.
Article 84		<p>2. New requirements of CACM 2.0 should not postpone the implementation of CACM 1.0. The go-live agenda is full by 2025 and disruptive proposals should not target an implementation before.</p> <p>Realistic deadlines have to be set based on the objective evaluation of the burden it represents, the resources available and the experience feedback of the implementation since CACM 1.0.</p> <p>2. The application timeline (6 months and 1 year) will depend on the final version of the text: concerned stakeholders should be consulted again to set the timeline based on the last version of CACM 2.0.</p>

Chapter 1 - Common grid model

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[210413_PC_AM_X_SOGL.1_CGM_final.pdf](#)

Article 16, Article 17, Article 18, Article 19 and Article 28 of CACM Regulation are proposed to be deleted from CACM Regulation and below articles from the SOGL Regulation amended.

Amended SOGL articles:

Article 40 Organisation, roles, responsibilities and quality of data exchange

Article 46 Scheduled data exchange

Article 52 Data exchange between TSOs and transmission-connected demand facilities

Article 64 General provisions regarding individual and common grid models

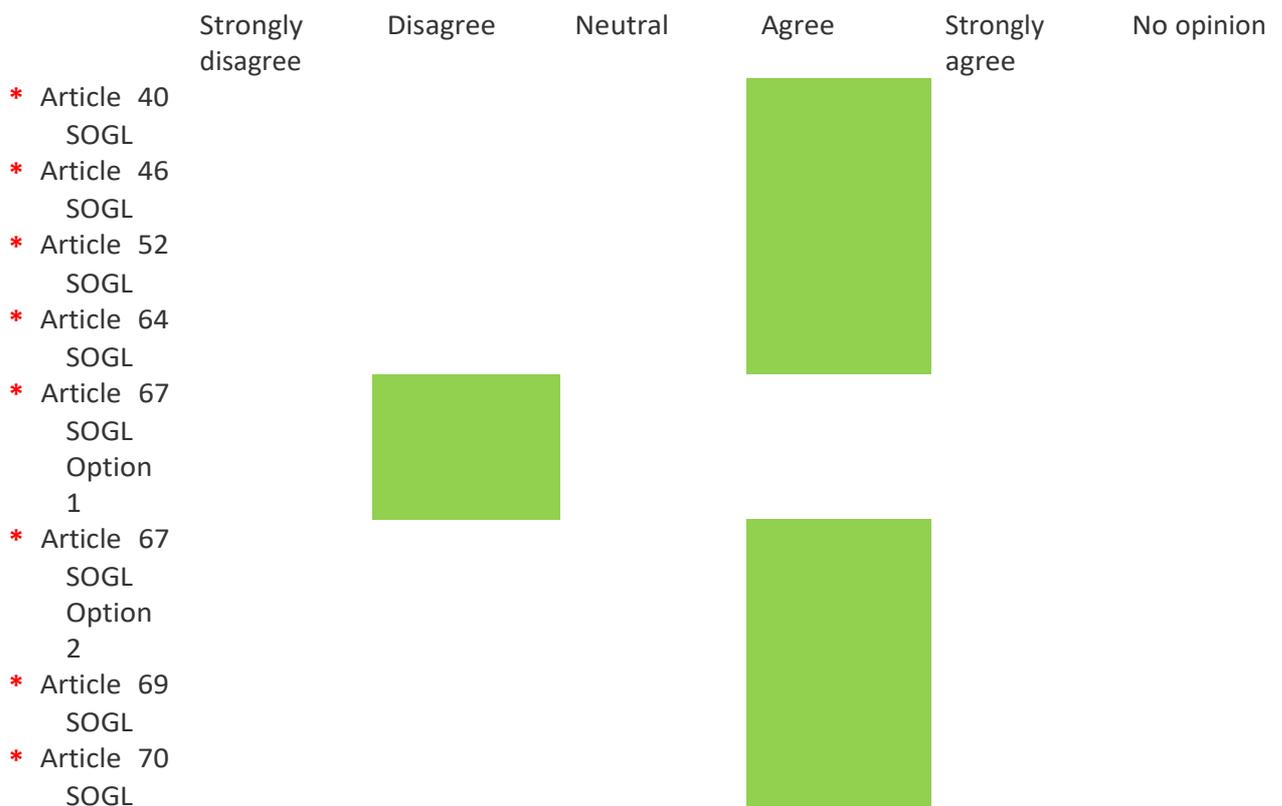
Article 67 Year-ahead and month-ahead individual and common grid models

- Option 1 Not to include the best forecast of remedial actions in IGM
- Option 2 Include the best forecast of remedial actions in IGM

Article 69 Week-ahead individual and common grid models

Article 70 Methodology for building two-days ahead, day-ahead and intraday common grid models (options in this article depend on options under X.1 Article 67)

X.1 What is your opinion on the proposed amendment?



* X.1 Do you consider the reasoning for the amendment sufficient?

- No
- Neutral

- Yes
- No opinion

X.1 Please provide your (additional) consideration on the reasoning if necessary.

1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration				X		
* Non-discrimination						X
* Effective competition						X
* Efficient functioning of the market						X

* .1 Do you want to provide a different proposal?

- Yes
- No

X.1 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 40 SOGL		
Article 46 SOGL		
Article 52 SOGL		
Article 64 SOGL	9. All TSOs shall make available to concerned market participants a representative set of common grid models, as referred in CACM Article 13A.	9. Eurelectric requests more transparency for concerned market participants on common grid models. Add the proposed paragraph as Article 64 (9).
Article 67 Option 1		
Article 67 Option 2	3. When creating the individual grid models referred to in paragraph 2, each TSO shall include the best forecasts of: (a) load and generation; the net positions of scheduling areas ;	3. It should be clarified that the costly remedial actions to be included shall be only already planned and ordered ones.

	the flows on HVDC systems ; the topology of the transmission system, and the remedial actions, including costly remedial actions already planned and ordered	
Article 69 SOGL		
Article 70 SOGL	3a. [...] the best-forecast of planned and ordered costly remedial actions [...]	3a. Agree with option 2 with the “remedial actions” amended as “planned and ordered costly remedial actions”

Chapter 2 - Remedial actions

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[210413 PC AM X SOGL.2 redispatching and countertrading final.pdf](#)

Article 35 and Article 73 are proposed to be deleted from CACM Regulation and Article 76 from the SOGL Regulation is proposed to be amended.

- Article 76 Proposal for regional operational security coordination
 - Option 1 Improved text in line with ACER Decisions
 - Option 2 Keeping the existing text from CACM Regulation and move to SO Regulation

X.2 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 76 SOGL Option 1						
* Article 76 SOGL Option 2						

* X.2 Do you consider the reasoning for the amendment sufficient?

- No
 Neutral
 Yes
 No opinion

X.2 Please provide your (additional) consideration on the reasoning if necessary.

Eurelectric does not express its opinion among option 1 or 2 about RD&CT cost-sharing.

Eurelectric comments on re-scoping CACM and moving provisions on RD & CT into SO GL are included as comments on Article 1 in Title I.

X.2 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration						X
* Non-discrimination						X
* Effective competition						X

* Efficient functioning of the market



* X.2 Do you want to provide a different proposal?

Yes

No

X.2 Please write your amendment proposal and the reasoning in the table below.

	Amendment	Reasoning
Article 76 SOGL Option 1		
Article 76 SOGL Option 2		

Summary

Please rate the importance of the following topics:

	Not at all important	Slightly important	Important	Fairly important	Very important	No opinion
* TITLE I - General Provisions					X	
* TITLE II, Chapter 1 - MCO organisation				X		
* TITLE II, Chapter 2 - Tasks and responsibilities				X		
* TITLE II, Chapter 3 - Costs				X		
* TITLE III, Chapter 1 - General requirements					X	
* TITLE III, Chapter 2 - Capacity calculation methodologies					X	
* TITLE III, Chapter 3 - Capacity calculation process					X	
* TITLE IV, Chapter 1 - Market coupling development, Section 1 - General Requirements					X	
* TITLE IV, Chapter 1 - Market coupling development, Section 2 - TCMs on algorithm development					X	
* TITLE IV, Chapter 1 - Market coupling development, Section 3 - TCMs on market coupling operation					X	
* TITLE V, Chapter 1 - Bidding zone review process					X	

- * TITLE VI, Chapter 1
-Reporting X
- * TITLE VI, Chapter 2
- X
Implementation
monitoring
- * TITLE VII - X
Transitional and
finalprovisions
- * SOGL proposals,
Chapter 1 - X
Common grid
model
- * SOGL proposals,
Chapter 2 - X
Remedial
actions

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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