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Contribution of the Slovak Republic with regard ACER consultation document „The definition of capacity calculation regions" (CCRs Proposal)

pursuant to Article 15(1) of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a Guideline on Capacity Allocation and Congestion Management (CACM Regulation).

The Agency invites interested stakeholders to express their views on the five questions below and to provide reasons for their comments. When doing so, stakeholders are asked to take into account that, according to the Agency, the CCRs Proposal should be compliant with the requirements of the CACM Regulation, as well as of Regulation (EC) No 714/2009 and, in particular, point 3.1 of its Annex I.

1. Do you consider both the commitment from the CWE and the CEE TSOs to cooperate towards a merger of the CWE and CEE CCRs and the MoU signed on 3 March 2016 as sufficient to ensure that the CWE and CEE regions will develop and implement a common congestion management procedure compliant with the requirements of the CACM Regulation, as well as of Regulation (EC) No 714/2009? Or should the definition of the CCRs provide for a CCR already merging the proposed CWE and CEE regions to ensure compliance with the required common congestion management procedure?

We think, that commitment from the CWE and CEE TSOs to cooperate towards a merger of the CWE and CEE CCRs as well as the MoU signed on 3 March 2016 creates solid and sufficient base for cooperation, development and implementation of a common flow based congestion management procedure in time. On the other hand, it is extremely challenging and complex task.

2. Do you have comments on the description of the geographical evolution of the CCRs over time, as proposed by all TSOs in Annex 3 to the Explanatory document to the CCRs Proposal?

We don't have any specific comment to Anex 3. Generally, we would like to emphasise again the importance of swift coupling of key European regions, i.e. CWE and CEE while the way of coupling of these two regions have to be based on realistic and pragmatic approach without undue distortion of ongoing development and implementation activities.

We would like to highlight also the appropriateness of the Serbian bidding zone border to be included as the integral part of CEE. It should help to cross-border trading in the region. The Serbian's border capacities (Serbia – Hungary, Serbia – Romania) are frequently used for transit within CEE.

3. Should the CEE region (or a merged region) include the bidding zone borders between Croatia and Slovenia, between Croatia and Hungary, and between Romania and Hungary?

Yes, definitely, it should be included. Mainly Romania - Hungary border should be included by default to be in line with achieved level of market integration (RO being part of successful 4M Coupling). Concerning the Croatia – Slovenia and Croatia – Hungary bidding zone borders, we support the inclusion of these profiles since the beginning in the CEE region.

4. Should the CEE region (or a merged region) include a bidding zone border between Germany/Luxembourg and Austria?

Yes, we agree with CCR 6 as it was proposed, inevitably including bidding zone border between Germany/Luxembourg and Austria. DE-AT profile is important and essential for capacity calculation in the whole region, inter alia, because of unscheduled flows from north of Germany and therefore it is vital to be part of CEE CCR.

5. Do you have comments on any other new element or development concerning the CCRs Proposal which occurred after the public consultation held by ENTSO-E from 24 August to 24 September 2015?

General observation is that implementation of CACM Regulation requirements has a significant delay and several implementation projects cannot continue as the essential precondition such as approved CCRs is still not met. This fact should be taken into account for final timetable of Electricity Balancing NC implementation.