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**PTPiREE ANSWERS TO THE QUESTIONS CONTAINED IN THE CONSULTATION DOCUMENT
„THE DEFINITION OF CAPACITY CALCULATION REGIONS”.**

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 do consider the commitment from the CWE and the CEE TSOs to cooperate towards a merger of the CWE and CEE CCRs and MoU as milestones on the way to developing common congestion management procedure compliant with the requirements of the CACM Regulation and Regulation (EC) No 714/2009.

However, the Day-Ahead Flow Based Capacity Calculation foreseen in the MoU is applicable only in the combined CWE and CEE CCRs. Therefore (as for intra-day timeframe the MoU signed on 3 March 2016 is not applicable), to enable development and implementation of a common congestion management procedure in compliance with the legislation mentioned above also for the intra-day timeframe, the definition of the CCRs should provide for a CCR already merging the proposed CWE and CEE regions

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?

No.

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.

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

In our opinion, yes.

The CCRs methodology is the key for the successful, non-discriminatory and transparent access and management of the interconnectors. According to substantially related with the CCRs ACER's opinion

no. 09/2015 of 23 September 2015, Germany/Austrian interconnector does not have sufficient capacity to accommodate all flows deriving from implementation of commercial contracts. Therefore, such flows are carried out as unscheduled energy flows, burdening interconnectors on other borders, such as: Polish/German, Polish/Czech and Czech/German or Czech/Austrian. Hence, especially the interconnectors between Germany/Austria should be considered as structurally limited and following this, we see the necessity of establishing capacity allocation method on this interconnector.

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?

No.



Robert Stelmaszczyk
Chairman of Board