

Dear Sirs,

On behalf of KIGEiT I thereby present our answers on 4 ACER questions:

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?

The commitment from the CWE and the CEE TSOs to cooperate towards a merger of the CWE and CEE CCRs, as well as the MoU constitute important steps towards common congestion management procedure, which would be compliant with the requirements of the CACM Regulation and Regulation (EC) No 714/2009. However, the MoU solely provides for Day-Ahead Flow Based Capacity Calculation applicable in the combined CWE and CEE CCRs. It means that for intra-day timeframe the MoU signed on 3 March 2016 is not applicable. In order to ensure development and implementation of a common congestion management procedure in compliance with the abovementioned regulations 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?

Yes. The capacity calculation regions methodology is crucial for the effective, non-discriminatory and transparent access and management of the interconnectors. ACER's opinion no. 09/2015 of 23 September 2015, which is substantially related with the CCRs, pointed out that Germany-Austrian interconnector does not have sufficient capacity to accommodate all flows deriving from implementation of commercial contracts. Hence, such flows are accomplished mainly through interconnectors on Polish-German, Polish-Czech, Czech-German, and Czech-Austrian borders, as unscheduled energy flows. Therefore, German-Austria interconnectors should be regarded as structurally limited. In consequence of that, there is a 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.

Best regards,
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Project Manager



Polish Chamber of Commerce for Electronics and Telecommunications