



**PKEE**

Polski Komitet Energii Elektrycznej  
Polish Electricity Association

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Comments prepared by the Polish Electricity Association in regards to the consultation document “The definition of capacity calculation regions” (PC\_2016\_E\_02).

**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 believe that the commitment from the TSOs (CWE, CEE) involving their cooperation in order to merge the CWE and the CEE Capacity Calculation Regions (CCRs) sets up a solid foundation for common congestion management procedure compliant with the requirements of the CACM Regulation, as well as of Regulation (EC) No 714/2009. Nevertheless, the MoU signed on 3 March 2016 is specifically applicable for Day-Ahead Flow Based Capacity Calculation. In our opinion the MoU is insufficient in the sense that it does not apply to the Intra-Day timeframe. Consequently, the common congestion management procedure should also embrace the Intra-Day timeframe and 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. The capacity calculation regions methodology is crucial for the effective, non-discriminatory and transparent access and management of the interconnectors.

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

In our opinion including a bidding zone border between Germany/Luxembourg and Austria is the right direction for achieving the non-discriminatory, effective and transparent access and management of the interconnectors. Furthermore, bidding zone border between Germany/Luxembourg and Austria would have a positive impact on the market efficiency and the effectiveness of the common European Electricity Market. Particularly, the Acer’s opinion no. 09/2015 of 23 September 2015, which is actually connected with the capacity calculation regions, indicates that the cross-border exchanges between Germany and Austria are physically realised partly through other borders like DE-PL, DE-CZ and CZ-AT interconnectors, which means that Germany-Austrian interconnector does not have sufficient capacity to accommodate all commercial flows.

**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.