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SP/24/16

Łódź, July 20th 2016

Agency for the Cooperation of Energy Regulators
Trg republike 3
1000 Ljubljana, Slovenia

Dear Sir or Madam,

In response to the invitation from Agency for the Cooperation of Energy Regulation expressed in „The definition of capacity calculation regions. Consultation document” (PC_2016_E_02; 22 June 2016), I would like to present the position of the Association of Polish Papermakers on the common proposal for capacity calculation regions (developed by the Transmission System Operators - Draft Version 1.0; 24 September 2015).

The Association of Polish Papermakers is an organization of scientific, technical and managerial qualities with individual and corporate members whose activities are connected with the paper and paper converting industries.

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?

SPP supports all initiatives promoting effective competition in the generation, trading and supply of electricity within the EU. Therefore SPP stands on a position, that the idea of coupling of the Member States energy markets, including the single day-ahead and intraday energy markets, should be implemented in the possible broad scope.

As regards 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, SPP supports the position of Urząd Regulacji Energetyki (Polish NRA), that the infra-day timeframe should also be included in the merger of the CWE and the 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.

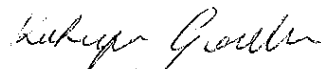
SPP is welcoming every action which would enable to use of the Polish-German interconnectors for the purposes of trade between Polish and German energy markets. Currently the possibility of energy exchange between Polish and German markets is excluded, as consequence of the situation in which contracts on sale of electricity are concluded, which implementation result in flows of electricity which could not be accommodated by German-Austrian interconnector and have to be accomplished through Polish-German, Polish-Czech, Czech-German and Czech-Austrian interconnectors as unscheduled electricity flows.

The inclusion of a bidding zone border between Germany and Austria, regarding the German-Austrian interconnector as structurally limited and establishing a capacity allocation method on this interconnector may make the trade of electricity between Polish and German markets possible. For this reason SPP strongly supports the position of Urząd Regulacji Energetyki (Polish NRA).

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

No.

Yours sincerely



Katarzyna Godlewska, Dr. Eng.

Director

The Association of Polish Papermakers