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OUR REFERENCE	CMN 16-150
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SUBJECT Consultation on the definition of capacity calculation regions (Regulation (EU) 2015/1222)

Dear Sir or Madam,

Thank you for the opportunity to give feedback with regard to the common proposal for capacity calculation regions which all Transmission System Operators (TSOs) have jointly developed pursuant to Article 15(1) of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a Guideline on Capacity Allocation and Congestion Management.

Please consider this response as a joint reply of TSOs TenneT TSO B.V (Netherlands) and TenneT TSO GmbH (Germany) and find our corporate answers below.

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?

TenneT is convinced that the commitment of CWE / CEE TSOs to cooperate as well as the proposed roadmap according to the MoU will lead to a successful delivery and implementation of a common day-ahead flow-based capacity calculation procedure which is compliant with the requirements of the respective regulations. Additionally, TenneT sees considerable benefits in and could support a direct merge of the CWE / CEE regions with regard to even larger efficiencies in joint projects and synergies in the development of common capacity allocation methodologies. Yet, in the case of a merged CWE/CEE region from the start, the challenges stemming from other CCR-related tasks such as e.g. the implementation of a common intraday market should not be underestimated and may lead to delays which should be tolerated by the concerned NRAs.

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?

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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?

TenneT supports the current proposal made by all TSOs and supports the above mentioned borders as part of the merged CWE-/CEE-region.

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

Yes, but we consider this consultation not as the correct formal process to define such a bidding zone border.

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?

According to your published consultation document, the Agency will consult the NRAs and the TSOs concerned pursuant to Article 8(1) of Regulation (EC) No. 713/2009 separately. We therefore consider this consultation not as consultation pursuant to the above mentioned Article and are looking forward to the separate consultation.

In the meantime, for any further questions, please do not hesitate to contact us.

Sincere regards,

TenneT TSO GmbH and TenneT TSO B.V



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