

Transelectrica Answers to ACER Consultation questions

Based on the recent internal consultation, members of the AmCham would like to express their views on the five 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?

R. Transelectrica takes note of the commitment from the CWE and the CEE TSOs, including Romanian TSO, to cooperate towards a merger of the CWE and CEE capacity calculation regions and encourages this cooperation as being 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. Therefore Transelectrica does not see the need for redefinition of CCRs in the sense of 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?

R. Transelectrica supports the ENTSO-E proposal as it sees the needs for improving the current description of the regions, as per Regulation (EC) No 714/2009,.

Moreover, considering the geographical position of Romania in both Central East Europe and South East Europe, the involvement of our country in CEE market coupling projects and the provisions of Article 20.4 of CACM Regulation Transelectrica supports the ENTSO-E position regarding the inclusion of Romania in both CEE and SEE regions.

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?

R. Yes. We consider that the bidding zone borders between Romania and Hungary and between Croatia and Hungary and Croatia and Slovenia as to be included in the CEE region.

As Romania is since 2014 in the 4MMC coupled market with CZ, SK and HU, the current status of RO-HU border is into the CEE region.

We consider that the position here-above is fully in line with EU regulation and ACER and EC vision regarding the IEM implementation aiming to ensure fair and non-discriminatory conditions for all European market participants.

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

R. We think the congestion management should be considered when different bidding zones are to be designed.

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?

R. Transelectrica strongly believe the new approach may create nondiscriminatory treatment and bring equal opportunities for all involved member states.