

ACER Decision on the first amendment of the long-term capacity calculation methodology of the Core capacity calculation region: Annex III

For information only

Evaluation of responses to the public consultation on the proposal for the first amendment of the long-term capacity calculation methodology of the Core capacity calculation region

1 INTRODUCTION

On 4 February 2026, the regulatory authorities of the Core capacity calculation region ('CCR'), referred to as ACER the Core transmission system operators ('TSOs') proposal for the first amendment to the long-term capacity calculation methodology for the Core CCR ('Core LT CCM') ('the Proposal').

In order to take an informed decision and in accordance with Article 14(1) of Regulation (EU) 2019/942, ACER launched a public consultation on 27 February 2026 inviting all interested stakeholders to provide any comments on the Proposal. The closing date for comments was 27 March 2026.

This document provides a summary of responses to ACER's public consultation.

2 PURPOSE AND OBJECTIVES

Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline on forward capacity allocation ('FCA Regulation') lays down detailed rules on cross-zonal capacity allocation in forward markets. In particular, Article 10 requires transmission system operators ('TSOs') in each capacity calculation region ('CCR') to jointly develop common methodologies for determining cross-zonal capacity in the long-term time frame. These long-term capacity calculation methodologies must be approved in accordance with the procedure set out in Article 4 of the FCA Regulation: first by the regulatory authorities of the relevant region within six months and, where they fail to agree within that period or upon their joint request, by ACER within the following six months.

Under Article 4(12) of the FCA Regulation, TSOs may propose amendments to regional methodologies to the regulatory authorities of the relevant region. Such amendments must follow the same development and approval procedure as the original methodologies.

The initial long-term capacity calculation methodology for the Core CCR (‘Core LT CCM’) was developed by the Core TSOs and subsequently amended and approved by ACER Decision 14/2021 of 3 November 2021, following a referral by the Core regulatory authorities after they had failed to agree on it.

On 19 January 2026, the Core TSOs submitted to the Core regulatory authorities their proposal for the first amendment to the Core LT CCM (‘Proposal’).

As the Core regulatory authorities could not agree on the Proposal, on 4 February 2026, they referred it to ACER for decision, in accordance with Articles 4(7)(a), 4(10) and 4(12) of the FCA Regulation.

The Proposal consists of two main amendments:

- a) Introduction of historic long-term Available Transfer Capacity (‘ATC’) values as a benchmark in the flow-based capacity calculation process (‘benchmark ATC values’); and
- b) Inclusion of the Ireland-Northern Ireland Single Electricity Market (‘SEM’) – France bidding zone border in the long-term capacity calculation following the commissioning of the Celtic Interconnector.

List of respondents

By the end of the consultation period, ACER received comments from ten respondents.

Organisation	Country	Type
ENGIE	Belgium	Association
Union Française de l'Electricité	France	Association
Eurelectric aisbl	Belgium	Association
HEP-Trade Ltd, member of HEP group	Croatia	Electricity trader
URSO/RONI	Slovak Republic	NRA
Energy Traders Europe	Netherlands	Association
Austrian Power Grid AG	Austria	TSO
EDF	France	Association
Oesterreichs Energie	Austria	Association
Slovenská elektrizačná prenosová sústava, a.s.	Slovak Republic	TSO

3 RESPONSES

ACER has carefully considered all stakeholders' comments in assessing the proposed first amendment of the Core LT CCM and finalising its position. This evaluation paper summarises all the respondents' comments and how these were considered by ACER. The table below is organised according to the consultation questions and provides the respective views from the respondents, as well as a response from ACER clarifying how their comments were considered in the present Decision.

Respondents' views	ACER views
<i>Question 1: Do you have any comments regarding the proposal for the introduction of the adjusted historic ATC benchmark to the long-term flow-based capacity calculation process? Please explain.</i>	
ENGIE	ENGIE supports the introduction of an adjusted historic ATC benchmark as a safeguard against very low or zero long-term capacity outcomes. However, we have serious concerns about the way the benchmark is implemented in the amended methodology, particularly the initial 90% - 110% range and the changes introduced in Article 14.7(b). The proposed formulation effectively introduces a lower cap equal to 100% of the historical benchmark (since $\text{MinATC} = \text{MaxATC} = \text{ATC benchmark} = 100\% \text{ of } 2025 \text{ historical NTC}$), which prevents the methodology from offering capacities above the historical value, even when the flow-based domain would technically allow it. We are concerned that this conservative approach which could lock-in artificially low capacities, when coupled with opaque IVA reductions, could run counter to the legal mandate to maximise capacity availability and does not allow the recognition of new network improvements which do not mirror the historical levels. We therefore recommend reviewing the proposed methodology in terms of the limitations that it may imply. In addition to this review, we would encourage a measure that when applying IVAs, TSOs should be required to provide clear & transparent justifications for the reduction (e.g., due to financial constraints, due to technical limitations, etc.) to enhance market participants' understanding of the unallocated capacities. We would also bring attention to the recent ENTSO-E policy paper on TSO's role in the allocation of LTTRs, where they challenge their role in this process. We interpret this as a reluctance on their part to provide more capacities in the future, despite the framework set out in the Forward Capacity Allocation ACER acknowledges ENGIE's concerns regarding the treatment of lower cap equal to 100% of the historical ATC benchmark. This approach is a deliberate choice of the TSOs, which has been supported by ACER in order to ensure a consistent, robust and harmonised safeguard within the long-term capacity calculation framework. It also corresponds to the TSOs' and ACER's simulations on the LTTR remuneration costs. ACER does not consider that the proposed approach results in a systematic limitation of available capacity or prevents the reflection of network developments in the capacity calculation process. The use of a benchmark-based safeguard is a methodological choice aimed at ensuring consistency, comparability and robustness of long-term capacity allocation outcomes across time. IVAs may be applied within the framework defined by the methodology and form part of the overall capacity calculation process. As there will be no direct link with the capacities

Respondents' views		ACER views
	regulation. We are concerned they will continue with a conservative approach to the capacity allocation, regardless of the changes in physical system conditions.	operationally offered at day-ahead level, we do not expect IVA application at LT level.
Union Française de l'Electricité	UFE has already expressed reservations regarding the implementation of the Long-term flow based. In particular, it has not been demonstrated that flow based capacity calculation and allocation would lead to higher economic efficiency as requested by FCA nor to an increase in cross zonal capacities made available to the market. According to some TSO simulations, certain bidding zones could see very low (even zero) volumes allocated on their borders. The current amendment proposal seeks to tackle the calculation issue by ensuring a minimum level of capacity on the different borders during the LT FB capacity calculation. UFE therefore welcomes, as a first step, the proposal to include a minimum ATC benchmark as a constraint for the calculation of the FB domain of LT capacities for both the yearly and the monthly capacity calculation. Thus, historical yearly and monthly ATCs would serve as the basis for the RAM to ensure that the result of the capacity calculation accommodates the historical benchmark. The process described in Article 14(7) is unnecessarily complex. Setting $\text{maxATC} = \text{minATC}$, leads to have RAM systematically equal to the induced flow before validation. It would have been simpler in Article 14(7) to set directly RAM at this specific value. If the current proposal is maintained, the calculation process will systematically lead to Flow Based domains that are similar to a single historical benchmark. However, the result of the allocation may be well above or below the historical value, depending on market conditions.	ACER notes UFE's comments regarding Article 14(7) and the formulation of the RAM adjustment mechanism. In the current methodology, the reference to a separate minATC and maxATC has been removed, as both values are intentionally set equal to the ATC benchmark. As a result, the adjustment mechanism does not rely on a range, but on a single benchmark value applied consistently in the determination of the induced flow limits. This design reflects a simplification of the original concept while preserving the underlying safeguard function. ACER does not consider that this formulation reduces the robustness of the approach or leads to a replication of a single historical value in the capacity calculation. The ATC benchmark is used solely as a constraint on the RAM adjustment. ACER takes note of UFE's remarks regarding potential monitoring and the allocation stage. These aspects may be considered in the context

Respondents' views		ACER views
	UFE notes that this proposal does not constitute an assurance that some borders would not see low if any allocated capacities. UFE would be in favor of investigating the possibility of a minATC at the allocation stage. UFE considers that the effects of the RAM adjustment should be monitored, in comparison with the levels of RAM computed initially. This monitoring should also encompass actual levels of capacity allocated at each border.	of future methodological reviews and implementation experience.
Eurelectric aisbl	Eurelectric has previously expressed reservations about LTFBA. To date, it has not been demonstrated that FB CC and allocation would lead to higher economic efficiency of LTTR allocation, as requested by FCA. In addition, TSO simulations have shown that certain bidding zones could see very low (even zero) volumes allocated on their borders. Eurelectric and Energy Traders Europe conducted a study showing that guaranteeing minimum offered volumes amounting to 50% of historical ATCs during flow-based allocation would barely decrease auction surplus. The amendment proposal seeks to tackle the calculation issue by ensuring a minimum level of capacity on the different borders during the LTFB capacity calculation. Since this measure addresses some concerns regarding low or zero capacities, we welcome, as a first step, the proposal to include a min ATC benchmark as a constraint for the calculation of the FB domain of LT capacities for both the yearly and the monthly capacity calculation. Thus, historical yearly and monthly ATCs would serve as the basis for the RAM to ensure that the result of the capacity calculation accommodates the historical benchmark. Induced flows are calculated for each CNEC based on an ATC benchmark factor, after which the RAM of each CNEC is adjusted based on the induced flows. The process described in Article 14(7) is unnecessarily	ACER acknowledges Eurelectric's comments and the concerns expressed regarding the outcomes of long-term flow-based capacity calculation and allocation. The introduction of the ATC benchmark within the RAM adjustment in Article 14(7) is intended as a methodological safeguard to ensure a consistent and robust constraint within the capacity calculation process, while still allowing for the flow-based approach to allocated capacity by taking into account the interdependency of Core bidding zones via PTDF factors. ACER takes note of the suggestions regarding potential safeguards at the allocation stage and monitoring of outcomes. These aspects may be considered in the context of implementation experience and future methodological

Respondents' views		ACER views
	complex. Setting $\text{maxATC} = \text{minATC}$ leads to having the RAM systematically equal to the induced flow before validation. It would have been simpler to directly set the RAM at this specific value in Article 14(7). This proposal is not an assurance that some borders would not see low, if any, allocated capacities. This point remains a concern to address. Eurelectric supports investigating the possibility of a minATC at the allocation stage. The effects of the RAM adjustment should be monitored, in comparison with the levels of RAM computed initially, encompassing actual levels of capacity allocated per border.	developments under the applicable governance framework.
HEP-Trade Ltd, member of HEP group	HEP supports the objective of introducing an adjusted historic ATC benchmark as a transitional tool to improve the robustness and timeliness of LT outputs. However, approval should be conditional on strict safeguards to avoid “virtual” LT capacity and unintended distortions. In particular, the benchmark-induced RAM reshaping step must be fully specified and auditable (inputs → induced flows → RAM adjustment → final offered LT capacities). ACER should require: (i) a clear definition of the benchmark dataset (offered vs allocated vs validated values; reference period; outlier/stress-day treatment), (ii) transparent splitting factor governance (publish benchmark and benchmark_split; change-control), (iii) binding-event logs showing on which CNECs RAM was forced to min/max induced-flow bounds and the RAM before/after, and (iv) a mandatory KPI review package (incl. per-border impacts, stability/volatility metrics, and minRAM/validation overrides). A specific “periphery impact check” (CE/SEE borders) is needed given low liquidity, lack of capacity market and inadequate physical hedging options together with the required physical adequacy measures.	ACER acknowledges HEP’s support for the introduction of the adjusted historic ATC benchmark and the comments regarding transparency, auditability and monitoring. The methodology already defines the benchmark-based RAM adjustment process and the governance framework applicable to the relevant parameters. ACER considers that the level of detail proposed by HEP, including event logging, KPI reporting and additional regional impact checks, relates primarily to implementation, monitoring and operational reporting rather than to elements that need to be further specified in the methodology itself. ACER nevertheless takes note of these suggestions and considers that additional

Respondents' views		ACER views
		transparency and monitoring measures may be addressed, where appropriate, through implementation practice, reporting arrangements and future methodological reviews under the applicable governance framework.
URSO/RONI	(LT) adjusted ATC benchmark values do not represent reality, are not based on real (delivery) capacities, but thereon and therewith not corresponding hedging behavior of diverse market participants, namely financial institutions, and the like. The proposed (LT) ATC values are inconsistent in approach (see exceptions; section bellow), do not represent (close to the) physical reality of allocated capacities in (close to the) delivery. (LT) ATC are determined upon an uncoordinated methodology, clearly confirmed by ACER on the 20.03.2026 1st LT CCM (1st amendment) meeting. Further consider Article 10(1) of the ""FCA"" (2016/1719 Guideline on Forward Capacity Allocation Regulation), in connection with Article 9(7) of the ""CACM"" (2015/1222 Guideline on Capacity Allocation and Congestion Management). Impacts on diverse Core CCR TSOs are unclear. The process of defining and adoption of the (LT) ATC adjusted benchmark values is therefore for 100% not based on a coordinated method(-ology), and thus implicitly does not allow for the to be implemented Congestion Income / Remuneration costs socialization.	ACER acknowledges the comments regarding the use of adjusted historical ATC benchmark values. However, the benchmark is not intended to represent physical delivery capacities or to replace the coordinated flow-based capacity calculation. Rather, it serves as a transitional safeguard within the long-term flow-based methodology. ACER agrees that the current approach, based on adjusted historical ATC benchmark values, does not yet constitute a fully coordinated solution in the strict sense. At the same time, ACER considers it an important and necessary step towards a more coordinated and integrated long-term flow-based capacity calculation framework. The benchmark ATC values proposed by the TSOs have been accepted as an appropriate basis for this transitional mechanism. ACER does not consider that the use of such benchmark ATC values is inconsistent with the

Respondents' views		ACER views
	DA based ATC values (basically the aim of the statistical Flow-based method proposed, which is (under current situation) widely recognised as the only possible solution) would be far more appropriate approach, representing the physical and delivery reality, and would, therefore, be correct to the maximal possible extend, fair and indiscriminatory, thus supporting a maximally even and fair distribution of the welfare.	FCA or CACM Regulations, as the coordinated flow-based capacity calculation remains the primary methodology for determining long-term capacity. The suggestion to use day-ahead-based values instead of the adjusted historical ATC benchmark falls outside the scope of the present amendment.
Energy Traders Europe	Energy Traders Europe supports the introduction of the ATC benchmark, as stated previously in our consultation responses and workshops. The benchmark can play an important role in preserving historically observed levels of long-term capacity and ensuring that cross-border exchanges relevant for hedging remain feasible within the flow-based domain. However, we reiterate our disagreement with the removal of LTA inclusion, expressed in a previous consultation and workshops. Until now, LTA inclusion ensured a certain level of capacity availability, corresponding to the expected capacity available in DA. Even without its removal, the current framework, based on minRAM applied to individual CNECs, still leaves capacity availability exposed to Individual Validation Adjustments (IVAs) performed by TSOs. Removing this guarantee risks reducing capacity availability on already constrained borders, particularly in the CEE region. Hence, we call for maintaining LTA inclusion in the capacity calculation process, as well as enacting transparent, coordinated, and non-discriminatory rules governing the use of IVAs. Furthermore, the proposed benchmark may act as a cap on capacity in situations where the flow-based calculation would allow higher	ACER acknowledges Energy Traders Europe's support for the introduction of the ATC benchmark and its comments regarding LTA inclusion and the objective of maximising cross-zonal capacity. ACER agrees that the current approach, including the introduction of the ATC benchmark, does not yet constitute a fully coordinated long-term flow-based solution in a strict sense. At the same time, ACER considers it an important and necessary transitional step towards a more coordinated and harmonised capacity calculation framework at Core level. The removal of LTA inclusion in DA CCM is necessary to disentangle LT capacities from operationally offered DA capacities and thus not to impose security issues at DA level. The introduction of the ATC benchmark reflects the design of the methodology proposed by the TSOs and accepted by ACER as an appropriate

Respondents' views		ACER views
	exchanges. We recall that, in accordance with Article 16 of Regulation (EU) 2019/943 and the FCA Regulation, TSOs are required to maximise the capacity made available to the market, while respecting operational security limits. No mechanism within the long-term capacity calculation methodology should result in an artificial limitation of cross-border capacity. The ATC benchmark should not serve as a de facto cap on the capacity that would otherwise be available under system conditions. We emphasise that the application of the benchmark must remain consistent with the overarching legal principle of maximising cross-border capacity and should allow higher capacities to be offered whenever the network permits.	transitional approach. ACER considers that the benchmark serves as a safeguard within the RAM adjustment process, while the available long-term capacity will be allocated through the coordinated flow-based capacity calculation in accordance with the methodology. With regard to IVAs, their application remains subject to the requirements and governance established in the methodology. ACER does not expect systematic IVA application at LT level.
Austrian Power Grid AG	APG views the introduction of the ATC benchmark as an appropriate measure to help ensure stable and proportionate LT FB domains at go-live. The benchmark increases predictability for market participants and facilitates a rather smooth transition to the new coordinated framework, given the methodological and timeline-related challenges encountered.	ACER welcomes APG's support for the introduction of the ATC benchmark. ACER agrees that the current approach, including the use of the ATC benchmark, does not yet constitute a fully coordinated long-term flow-based solution in a strict sense. At the same time, ACER considers it an important and necessary transitional step towards a more coordinated and harmonised capacity calculation framework at Core level. ACER considers that the benchmark provides an appropriate transitional safeguard for the implementation of the long-term flow-based capacity calculation methodology. It contributes

Respondents' views		ACER views
		to improving the robustness and predictability of long-term capacity calculation outcomes while facilitating a gradual and smooth transition to a fully coordinated long-term framework.
EDF	EDF has already expressed reservations regarding the implementation of the Long-term flow-based. In particular, it has not been demonstrated that flow-based capacity calculation and allocation would lead to higher economic efficiency as requested by FCA nor to an increase in cross-zonal capacities made available to the market. According to some TSO simulations, certain bidding zones could see very low (even zero) volumes allocated on their borders. The current amendment proposal seeks to tackle the calculation issue by ensuring a minimum level of capacity on the different borders during the LT FB capacity calculation. EDF therefore welcomes the proposal to include a minimum ATC benchmark as a constraint for the calculation of the FB domain of LT capacities for both the yearly and the monthly capacity calculation. Thus, historical yearly and monthly ATCs would serve as the basis for the RAM to ensure that the result of the capacity calculation accommodates the historical benchmark. Induced flows are calculated for each CNEC based on an ATC benchmark factor, after which the RAM of each CNEC is adjusted based on the induced flows. The process described in Article 14(7) is unnecessarily complex. Setting $\text{maxATC} = \text{minATC}$, leads to have RAM systematically equal to the induced flow before validation. It would have been simpler in Article 14(7) to set directly RAM at this specific value.	ACER acknowledges EDF's support for the introduction of the ATC benchmark and its comments regarding the design of Article 14(7), monitoring and potential safeguards at the allocation stage. ACER agrees that the current approach, based on a single ATC benchmark value within the RAM adjustment mechanism, does not yet constitute a fully coordinated long-term flow-based solution in a strict sense. At the same time, ACER considers it an important and necessary transitional step towards a more coordinated and harmonised capacity calculation framework at Core level. The current methodology no longer relies on separate minimum and maximum ATC values. Instead, it applies a single ATC benchmark value as part of the RAM adjustment mechanism, reflecting the revised design proposed by the TSOs and accepted by ACER, in accordance with corresponding TSO and ACER simulations. ACER considers that this

Respondents' views	ACER views
	This proposal does not constitute an assurance that some borders would not see low allocated capacities. This concern needs to be addressed. EDF would be in favor of investigating the possibility of a minATC at the allocation stage. At the minimum, EDF considers that the effects of the RAM adjustment should be monitored, in comparison with the levels of RAM computed initially. It should encompass actual levels of capacity allocated at each border. EDF regrets the lack of data regarding the volume resulting from the FB calculation and the need for a maxATC is still to be demonstrated. approach provides an appropriate transitional safeguard without altering the fundamental principles of the coordinated flow-based capacity calculation. ACER takes note of EDF's suggestions regarding monitoring, additional safeguards at the allocation stage and the publication of further data. These aspects may be considered in the context of implementation experience and future methodological reviews.
Oesterreichs Energie	As already stated, we generally do not agree with flow based allocation in the long-term horizon. The cost-benefit assessment presented so far is not sufficiently transparent, and the consequences of the proposed changes are not adequately addressed. We therefore call for a more comprehensive and traceable analysis of the impacts, in particular with regard to security of supply and the costs for individual Member States. If further analyses already exist, these results should be disclosed and explained transparently. During the last CORE Meeting a diagram of the LTFB EXT//RUN was shown with still very little capacity available at numerous borders ("accepted volumes") in respect to the related "benchmarks". E.g. CZ->DE 10 MW/600MW, DE->CZ 43MW/300MW, HU->SI 15MW/150MW, SI->HU 37MW/150MW ACER acknowledges the comments regarding the implementation of long-term flow-based capacity calculation, the publication of supporting analyses, the observed allocation results and the application of IVAs. The present amendment is limited to the introduction of an ATC benchmark as a transitional safeguard and does not reconsider the decision to implement the long-term flow-based methodology. The allocation outcomes referred to in the comment reflect market results and cannot be assessed solely on the basis of the benchmark ATC values. The application of IVAs remains subject to the requirements of the methodology, however ACER does not expect its systematic usage.

Respondents' views		ACER views
	We still cannot evaluate in this context the effects of the mechanism and rules of the use of IVAs. Possible annual adjustments of ATC values undermine planning certainty. A minimum period of three years is needed to support liquidity in the long-term market.	With regard to the annual review of the benchmark ATC benchmark, ACER notes that a new Article 18(8) has been introduced requiring the Core TSOs to perform an annual re-evaluation of the ATC benchmark values and to update them where they consider this to be appropriate. ACER considers that this mechanism ensures that the benchmark remains representative of evolving network conditions while preserving the necessary flexibility to reflect changes in the power system.
Slovenská elektrizačná prenosová sústava, a.s.	SEPS does not agree with the use of the historic ATC benchmark in LT FB CC as an input parameter for determining the final FB domain, because they were not coordinated in the Core CCR in the past but were determined bilaterally without the coordinated approach. Therefore, it is in principle not correct and unacceptable to rely on the historic ATC benchmark to the coordinated LT FB CC in the Core CCR. Moreover, they suppress the substance of the established scenario approach. In addition, for certain borders, the proposed benchmark values are highly likely not to correspond to future production data, which may distort the outcomes of the external parallel run.	ACER acknowledges SEPS' concerns regarding the use of the historical ATC benchmark. ACER agrees that the current approach, based on historical ATC benchmark values, does not yet constitute a fully coordinated long-term flow-based capacity calculation methodology in a strict sense. At the same time, ACER considers it an important and necessary transitional step towards a more coordinated and harmonised LT flow-based framework at Core level. The historical ATC benchmark is not intended to replace the fully coordinated long-term capacity calculation approach. It is introduced solely as a transitional safeguard to support the

Respondents' views		ACER views
		implementation of the coordinated methodology. ACER also notes that the methodology provides for a regular review of the ATC benchmark values. Pursuant to Article 18(8), the Core TSOs are required to evaluate the benchmark values annually and update them where appropriate, ensuring that they remain representative as system conditions evolve.

Respondents' views		ACER views
Question 2: Do you have any comments or concerns regarding the way in which the historic long-term ATC benchmarks are determined? Please explain.		
ENGIE	ENGIE believes that while historical ATC values can serve as a useful reference point, the current approach raises concerns about representativeness, transparency, and design robustness. The fixed 90-110% band around a single historical year amplifies these issues, embedding temporary system conditions into a long-term rule and, through Article 14.7(b), effectively imposing a hard cap equal to the historical benchmark. A further concern is the ex-post review mechanism, whereby 2026 long-term capacities remain anchored to 2025 ATC values, and 2027 capacities will be based on 2026 ATC outcomes. Because this update process is purely backward-looking, the benchmark becomes a rolling historical cap. It prevents the LT methodology from recognising genuine physical improvements or enabling upward adjustments, even when the FB domain allows higher capacities. In practice, it reinforces NTC-based historical limitations rather than transitioning toward a forward-looking flow-based framework. We recommend: - Reassessing the use of a single-year historical baseline and considering multi-year averages or a justified alternative - Reviewing how the current historical benchmark's review may lock in certain values and exclude parameters which may increase available capacities - Ensuring full transparency on input data, assumptions, seasonal factors, splitting rules, and border-specific parameters Benchmark values must not lock in outdated constraints or prevent the market from benefitting from real improvements in network conditions. The	ACER acknowledges ENGIE's comments regarding the representativeness of the historical ATC benchmark and the annual review mechanism. The ATC benchmark is intended as a transitional safeguard and not as a substitute for a fully coordinated long-term capacity calculation. ACER does not consider that the benchmark constitutes a permanent cap on available capacity or prevents the methodology from reflecting evolving system conditions. To ensure that the benchmark remains representative over time, Article 18(8) requires the Core TSOs to perform an annual evaluation of the ATC benchmark values and to update them where appropriate. ACER also takes note of the suggestions regarding the benchmark methodology and transparency. These aspects may be considered in the context of implementation experience and future methodological reviews.

Respondents' views		ACER views
	methodology should facilitate capacity levels that reflect actual system capacity.	
Union Française de l'Electricité	Article 10a and Annex I define the year 2025 as the reference for calculating yearly and monthly (with the 2025 seasonal average of historic monthly ATC) Benchmark ATC values. The choice of the year 2025 as a reference is not explained in the explanatory document. The rationale behind this choice should be detailed. Indeed, from a theoretical standpoint, a single year seems too restrictive to be representative. Furthermore, the historical benchmark should not result in locking in outdated capacity values, nor preventing the market from benefiting from improvement in the network conditions. Therefore, UFE welcomes the benchmark review process expected to be carried by the TSOs 18 months after the go-live of LTFBA at the latest. Thus, any improvement in the network can be included in that process, and the benchmark values could be modified accordingly. Finally, without the methodology for updating the ATC benchmark values, it is very difficult to provide an appropriate answer regarding their determination. UFE therefore requests full transparency of input data, assumptions, and resulting benchmark values, as well as regular reviews to ensure alignment with evolving system conditions.	ACER acknowledges UFE's comments regarding the choice of the 2025 reference year, the representativeness of a single-year baseline, and the transparency of the benchmark calculation. The selection of 2025 as the reference year is a methodological choice made by the TSOs and reflected in the submitted proposal. ACER considers that this provides a consistent and clearly defined basis for the initial calculation of the ATC benchmark values within the transitional framework, as the year 2025 is the last complete year before the amendment publication and application. The use of a single reference year does not preclude future adjustments, as the methodology includes a structured annual review mechanism. In this regard, ACER notes that Article 18(8) introduces a requirement for the Core TSOs to evaluate the ATC benchmark values on an annual basis and to update them where necessary. This ensures that the benchmark remains aligned with evolving system conditions. ACER also takes note of the request

Respondents' views		ACER views
		for enhanced transparency regarding input data, assumptions and resulting benchmark values. These elements are covered by the governance framework of the methodology and its reporting obligations.
Eurelectric aisbl	Article 10a and Annex I define the year 2025 as the reference for calculating yearly and monthly (with the 2025 seasonal average of historic monthly ATC) Benchmark ATC values. The choice of the year 2025 as a reference is not explained in the explanatory document. The rationale behind this choice should be detailed. Indeed, from a theoretical standpoint, a single year seems too restrictive to be representative. Furthermore, the historical benchmark should not result in locking in outdated capacity values, nor preventing the market from benefiting from improvement in the network conditions. Finally, without the methodology for updating the ATC benchmark values, it is very difficult to provide an appropriate answer regarding their determination. We therefore request full transparency of input data, assumptions, and resulting benchmark values, as well as regular reviews to ensure alignment with evolving system conditions.	ACER acknowledges the comments regarding the choice of the 2025 reference year, the representativeness of a single-year baseline, and the transparency of the ATC benchmark calculation. The selection of 2025 as the reference year is a methodological choice made by the TSOs and reflected in the submitted proposal. ACER considers that this provides a clear and consistent basis for the initial establishment of the ATC benchmark values within the transitional framework, as the year 2025 is the last complete year before the amendment publication and application. The use of a single reference year does not prevent future updates of the benchmark, as the methodology includes a mandatory annual review mechanism under Article 18(8), ensuring that benchmark values remain aligned with evolving system conditions.

Respondents' views		ACER views
		ACER also notes the request for greater transparency regarding input data, assumptions and resulting benchmark values. These elements are governed by the methodological framework and its reporting and review provisions, which ensure appropriate oversight and traceability of the benchmark calculation.
HEP-Trade Ltd, member of HEP group	HEP has concerns that must be addressed through clearer specification and governance. The methodology should explicitly state whether “historic” benchmarks are based on offered, allocated, or validated LT capacities, and how exceptional periods and stress events are handled (include/exclude rules). The choice of reference year(s) and the update cycle after go-live must be defined, including consultation and change-control. Splitting factor application (e.g., yearly values adjusted via splitting) must be transparent, stable, and published as both benchmark and benchmark_split values, with clear rules for future adjustments. Border-specific calibrations (very low monthly values on some periphery borders) require justification and monitoring to ensure non-discriminatory outcomes and adequate and concrete physical hedging options. Finally, the benchmark must be assessed not only on MW but also on hedging usefulness in concrete critical situations in line with FCA Art. 30 indicators and ENTSO-E’s “hedging needs/opportunities” approach, providing explicit measures for prevention of the security of supply.	ACER acknowledges HEP’s comments regarding the definition, governance and transparency of the ATC benchmark, including the proposed specification of input data, treatment of exceptional periods, splitting factors and border-specific outcomes. The methodology defines the ATC benchmark as a transitional parameter based on historical ATC values derived from the data sets used by the TSOs in accordance with the established methodology. The determination of the reference year and the update process are governed by the methodological framework, including the annual review requirement under Article 18(8), which ensures that benchmark values can be adjusted where necessary to reflect evolving system conditions. ACER considers that the level of granularity proposed by HEP, including detailed

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		classification of input data types, event-level reporting, and additional performance indicators, relates primarily to implementation, monitoring and transparency practices rather than to elements that need to be further specified in the methodology itself. The methodology already ensures a structured framework for the calculation and application of the benchmark, while maintaining flexibility for operational implementation. ACER takes note of the suggestions regarding enhanced monitoring of allocation outcomes and the assessment of hedging adequacy. These aspects may be considered in the context of implementation experience and future methodological reviews under the applicable regulatory framework.
URSO/RONI	(LT) ATC are determined upon an uncoordinated methodology, bilaterally (up until now), with exceptions defying the rule. The proposed (LT) ATC values are inconsistent in approach and do not represent (close to the) physical reality of allocated capacities in delivery. Inconsistency is caused by exceptions to the method adopted (showing also that different approach is possible, even as of now, even if probably not immediately achievable for all stakeholders), with the for PL- (DE, CZ, SK), SI-HR, DE-AT (and only formally SEM-FR as well) oriented borders (LT)	ACER acknowledges the comments regarding the methodology for determining historical ATC benchmark values and the examples provided for specific borders. ACER agrees that the current approach, based on historical ATC benchmark values, does not yet constitute a fully coordinated long-term capacity calculation methodology in a strict sense. At the same time, ACER considers it an

Respondents' views	ACER views
ATC historical benchmarks being adjusted, in different ways, with different goals. Namely: PL (+) - a single TSO methodology, (most probably) based on real DA values (there are no others to lean on). Even then, nobody dares to predict, what these newly set values will cause in the Core CCR. Yet showing the right way for the future, which we welcome very much). SI-HR - an exception as is, with even more extra capacity granted, as already acknowledged, for the needs of the inter-governmental ""Krško"" agreement, being in direct contradiction to EU law, according to and recognized by ACER. We understand the importance of the agreement, yet all stakeholders' positions should be recognized in an equally fair way.) DE-AT - even if seemingly forthcoming reduction of historical values, which we gratefully acknowledge, reasoning behind it is unclear (a thorough explanation would be very much appreciated); and therefore, effect of this decision remains unpredictable. The process of defining and adoption of the (LT) ATC adjusted benchmark values is not based on a coordinated method, and therefore implicitly does not allow the foreseen Congestion Income socialization implementation/entering into force (see further).and therefore representing a very likely legal problem in the future.	important and necessary transitional step towards a more coordinated and harmonised LT framework at Core level. The ATC benchmark is introduced as a transitional parameter within the long-term flow-based capacity calculation framework and is based on historical data derived in accordance with TSOs' established processes. While historical ATC values may differ across borders due to system-specific conditions, this does not indicate a lack of coordination, but rather reflects heterogeneous network characteristics within a common methodological framework. With regard to the examples raised, ACER notes that the approach applied for PL borders ensures continuity where alternative consistent historical inputs may otherwise be limited, thereby avoiding non-representative values. For the SI–HR border, specific long-standing arrangements and operational conditions are duly reflected within the capacity calculation framework without altering the underlying EU regulatory principles. For the DE–AT border, updates of historical values reflect vast Core TSO consensus.

Respondents' views		ACER views
		ACER does not consider that these examples demonstrate inconsistency in the methodology. Rather, they illustrate the application of a common framework to different system realities across the Core region, while maintaining consistency and transparency in the use of historical references.
Energy Traders Europe	The use of historical data is appropriate to guarantee minimum volumes of hedging instruments made available to the market by the TSOs. However, it should not result in locking in outdated capacity levels or preventing the market from benefiting from improvements in network conditions. The 4.900 MW guaranteed capacity at the DE-AT border in the forward timeframe was a compromise between BNetzA and E-Control in the context of the DE-AT bidding zones split, down from around 10.000 MW before that. While we understand that the rationale of the new LTCCM is to move to a true capacity calculation at all Core borders and do away with fixed capacity agreements, we question the choice of the 50% ratio for the benchmark of historical values at the DE-AT borders. We request more detailed justifications on the ratio choice for this border, with illustrations of the effect of adopting alternative benchmarks. We also note that adjustments such as splitting factors and seasonal aggregation introduce additional complexity and reduce transparency. Market participants should be able to understand and anticipate how benchmark values are derived and how they influence the calculation process.	ACER acknowledges the comments regarding the use of historical data, the DE–AT benchmark level, and concerns related to transparency, complexity and consistency across borders. The use of historical ATC values is intended to ensure a minimum level of long-term hedging capacity within the transitional flow-based framework. It does not aim to replicate past fixed arrangements as the benchmark is updated. It prevents capacity increases on the level it would have large negative effect on TSOs' LTTR remuneration costs. With regard to the DE–AT border, ACER notes that the benchmark level, including the use of the 50% ratio, is part of the methodological design proposed by the TSOs and agreed with vast majority. ACER considers that differences in historical arrangements across borders reflect

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	In addition, any differentiated treatment across borders should be clearly justified and subject to regulatory oversight to avoid arbitrary or discriminatory outcomes. We recommend full transparency of input data, assumptions, and resulting benchmark values, as well as regular reviews to ensure alignment with evolving system conditions.	specific system and regulatory developments and do not in themselves indicate arbitrary treatment. ACER takes note of the comments on splitting factors, seasonal aggregation and transparency. These elements are part of the detailed implementation of the methodology and are subject to the governance framework, including reporting and review provisions, which ensure oversight and periodic reassessment in line with evolving system conditions.
Austrian Power Grid AG	APG considers the use of 2025 ATC values as reference appropriate, as they represent the latest year with an established long-term allocation practice. This methodology is transparent and offers a pragmatic foundation for applying LT FB.	ACER acknowledges APG's support for the use of 2025 as the reference year for the ATC benchmark values. The selection of 2025 as the reference year is a methodological choice made by the TSOs and provides a consistent and clearly defined basis for the initial establishment of the benchmark within the transitional framework, as the year 2025 is the last complete year before the amendment publication and application. ACER considers that this approach ensures transparency and practicality in the implementation of the long-term flow-based capacity calculation while maintaining

Respondents' views		ACER views
		continuity with existing long-term allocation practices. ACER notes that the methodology also includes an annual review mechanism under Article 18(8), which ensures that benchmark values can be updated where necessary to reflect evolving system conditions.
EDF	Article 10a and Annex I define the year 2025 as the reference for calculating yearly and monthly (with the 2025 seasonal average of historic monthly ATC) Benchmark ATC values. The choice of the year 2025 as a reference is not explained in the explanatory document. The rationale behind this choice should be detailed. Indeed, from a theoretical standpoint, a single year seems too restrictive to be representative. Furthermore, the historical benchmark should not result in locking in outdated capacity values, nor preventing the market from benefiting from improvement in the network conditions. Finally, without the methodology for updating the ATC benchmark values, it is very difficult to provide an appropriate answer regarding their determination. We therefore request full transparency of input data, assumptions, and resulting benchmark values, as well as regular reviews to ensure alignment with evolving system conditions.	ACER acknowledges the comments regarding the choice of 2025 as the reference year, the representativeness of a single-year baseline, and the transparency of the ATC benchmark methodology. The selection of 2025 as the reference year is a methodological choice made by the TSOs and provides a consistent and clearly defined basis for the initial establishment of the ATC benchmark values within the transitional framework, as the year 2025 is the last complete year before the amendment publication and application. ACER considers that the use of a single reference year ensures simplicity, traceability and a stable starting point for implementation. ACER further notes that the methodology includes an annual review mechanism under Article 18(8), which ensures that ATC

Respondents' views		ACER views
		benchmark values are regularly assessed and updated where necessary to reflect evolving system conditions. This addresses the concern that benchmark values could otherwise become outdated or insufficiently reflective of network developments. ACER takes note of the request for enhanced transparency regarding input data, assumptions and resulting benchmark values. These elements are governed by the methodological framework and its reporting and review provisions, which ensure appropriate oversight and traceability.
Oesterreichs Energie	We reject the proposed special treatment of the DE–AT border, where the benchmark is set at only 50% of the historical ATC values. This unequal treatment is not objectively justified and runs counter to the objective of a non-discriminatory European electricity market and goes against the Article 16 of Regulation (EU) 2019/943 and the FCA Regulation, where TSOs are required to maximise the capacity made available to the market, while respecting operational security limits. In addition, the previous division between yearly and monthly capacity was 60%/40% of totally 4.900 MW (2019-2022), from 2023 onwards it was changed to 40%/60% of totally 4.900MW and often decreased on monthly basis.	ACER acknowledges the comments regarding the DE–AT benchmark level, the historical evolution of capacity split between yearly and monthly timeframes, and the concerns related to non-discrimination and capacity maximisation under Article 16 of Regulation (EU) 2019/943 and the FCA Regulation. The benchmark values, including the DE–AT parameterisation, are based on a methodological design proposed by the TSOs (with vast majority in favour of it) and assessed within the context of establishing a consistent transitional framework for long-term flow-

Respondents' views		ACER views
	Now it should be 80% y/20% m, whereas it shows only 1125 MW for yearly allocation in Annex 1 (which is less than 15% of the historical values of over 10.000 MW on DE-AT border of 8 years ago).	based capacity calculation. ACER does not consider that the use of a 50% factor or the resulting split between yearly and monthly capacities constitutes a special treatment of the DE-AT border, but rather a harmonised application of the benchmark approach reflecting updated methodological assumptions and system conditions. With regard to historical developments in capacity allocation shares, ACER notes that changes in the split between yearly and monthly products reflect adaptations of the long-term allocation framework over time and are not directly comparable to benchmark-based capacity values derived under the new flow-based methodology.
Slovenská elektrizačná prenosová sústava, a.s.	The historic long-term ATC benchmarks were not coordinated in the Core CCR but were in the past determined bilaterally without the coordinated approach. Therefore, it is in principle not correct and unacceptable to add the historic long-term ATC benchmarks to the coordinated LT FB CC in the Core CCR. Instead, LT FB CC shall produce capacities which would correspond to the amount of DAM as of go-live. For SEPS, the principle of how the DE-AT ATC benchmark value of 50% of LT NTC was determined is not clear.	ACER acknowledges SEPS' comments regarding the use of historical long-term ATC benchmarks and the concerns related to coordination, representativeness and the DE-AT benchmark level. The ATC benchmark is introduced as a transitional parameter within the long-term flow-based capacity calculation framework. While historical ATC values may have been developed under different arrangements, their

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The statistical value from the DA FB process should be taken as a reference value for the ATC benchmark guaranteeing the adequacy of the LTTR hedging volumes on individual BZBs.	use in this context is limited to providing a consistent reference input for the transitional methodology. It does not permanently replace the fully coordinated capacity calculation. With regard to the DE–AT benchmark level, ACER notes that the parameterisation, including the 50% factor, is part of the methodological design proposed by the TSOs and assessed within the overall framework of ensuring a workable and consistent transitional solution. ACER is of a view that long-term statistical flow-based approach based on day-ahead capacities is a potential permanent solution and included a recommendation to Core TSOs to consider it in the next amendment.

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<i>Question 3: Do you have any comments or concerns regarding the integration of the Ireland - France bidding zone border into the Core LT CCM once Celtic interconnector commissioning is finalized? Please explain.</i>		
ENGIE	For borders where long-term rights were not historically issued, we consider the use of historical ATCs as inappropriate. Relying on zero or near-zero historical benchmarks would perpetuate the structural absence of long-term hedging opportunities, regardless of improved network conditions or market needs. We therefore recommend: -Using a forward-looking or proxy benchmark, based on credible modelling of expected interconnector capability -Establishing a minimum LT capacity threshold for structurally under-issued borders -Applying strengthened monitoring and scrutiny of TSOs' validation adjustments for these borders A benchmark methodology must correct, not replicate, historically deficient LTTR issuance.	ACER acknowledges the comments regarding borders where long-term rights have not been historically issued, including the Ireland–France interconnection, and the concerns related to the use of historical ATC values in such cases. The ATC benchmark is designed as a transitional approach based on available historical data and is applied consistently across all relevant borders within the methodology. ACER does not consider that the absence of historical LTTR issuance, in itself, justifies the use of forward-looking or proxy-based benchmarks within the current framework, as this would go beyond the scope of the transitional design agreed for the LT flow-based implementation. The benchmark does not aim to correct historical allocation outcomes, but to provide a consistent safeguard during the transition to the coordinated regime, as described in Article 22 of the Core LT CCM. ACER takes note of the suggestions regarding minimum thresholds and enhanced monitoring of validation adjustments. These aspects may be considered in the context of implementation

Respondents' views		ACER views
		experience and future methodological reviews under the applicable governance framework.
HEP-Trade Ltd, member of HEP group	HEP considers that using “historic LT allocations” as the sole benchmark reference can unintentionally hard-code “0 MW” outcomes and thereby lock-in the absence of LT hedging and undermine market integration for those borders. For Polish borders, ACER should require an alternative benchmark approach (or a special-case rule) based on the underlying physical potential and/or historical DA/ID capacity availability and security constraints, rather than past LT auction outcomes alone. A pragmatic solution could include: (i) a provisional benchmark derived from model-based capacity calculation (with explicit uncertainty margins), (ii) use of external parallel run results and a staged introduction with monitoring, and (iii) a clear review mechanism with KPIs to avoid discrimination and prevent persistent “zero-capacity by design.” The objective should be to enable gradual development of LT hedging opportunities while maintaining operational security and transparency.	ACER acknowledges HEP’s concerns regarding borders with historically low or zero long-term allocations and the potential impact of using historical LT values as a benchmark reference. The ATC benchmark is designed as a transitional safeguard based on available historical data and is applied in a consistent manner across all relevant borders. ACER does not consider that the use of historical LT allocations leads to a “lock-in” of zero capacity outcomes. ACER does not consider it appropriate within the current methodology to replace historical benchmark values with forward-looking or model-based proxies, as this would go beyond the agreed transitional design of the LT framework. The purpose of the benchmark is to ensure a consistent and traceable input during the transition. ACER takes note of the suggestions regarding staged introduction, monitoring and KPI-based assessment. These aspects may be considered in the context of implementation experience and future methodological reviews under the applicable governance framework.

Respondents' views	ACER views
URSO/RONI	If it holds for PL (LT) ATC adjusted values will be determined upon a methodology (individual, stressing out the uncoordinated nature of the whole overall approach) based on DA values (there are no others to lean on), then it is possible for all oriented borders. Also, it is unclear, what impact on the Core CCR these values will have, specifically on PL borders. We welcome PSE's approach to the matter and hope that it will help all stakeholders in future mutual effort. ACER acknowledges the comments regarding the approach applied to the PL borders and its potential implications for other borders within the Core CCR. ACER agrees that the current approach, based on historical ATC benchmark values, does not yet constitute a fully coordinated long-term capacity calculation methodology in a strict sense. At the same time, ACER considers it an important and necessary transitional step towards a more coordinated and harmonised LT framework at Core level. The methodology for the ATC benchmark is based on harmonised principles defined at Core level and applied consistently across all relevant borders. While the underlying historical datasets may differ depending on data availability and system characteristics, this does not imply an uncoordinated approach, but rather reflects the application of a common framework to different national and border-specific contexts. ACER considers that the approach applied for PL borders does not automatically necessitate replication across all other borders, as each border is subject to its own historical data, operational conditions and methodological parameters. The impact on the Core CCR is

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		addressed through the coordinated implementation of the LT flow-based capacity calculation methodology, which ensures consistency of outcomes at regional level. ACER takes note of the supportive remarks regarding the approach taken by PSE and welcomes constructive contributions from stakeholders in the further development and implementation of the methodology.
Energy Traders Europe	We are deeply concerned regarding the application of allocation constraints on the Polish borders, where we have observed significant under-issuance of LTTRs. This situation has not improved over the years despite several calls from market participants and the evolution of network topology (internal and cross-border transmission lines, PSTs, etc.). In the Polish case, reliance on historical ATC values risks perpetuating the underissuance of long-term transmission rights (LTTRs). The persistent lack of LTTRs at the South-western Polish borders restricts cross-border hedging and undermines market development. At the borders with Germany, Czechia, and Slovakia, long-term transmission rights (LTTRs) have either been unavailable or underissued in recent years. Monthly transmission rights have seldom been allocated since 2021, while yearly products have been largely absent since 2017. This situation persists despite significant network improvements, multiple requests from market participants,	ACER acknowledges the concerns regarding the historical issuance of LTTRs on the Polish borders and the use of historical ATC values as the basis for the benchmark. The ATC benchmark is intended as a transitional safeguard within the long-term flow-based methodology and is not designed to address historical patterns of LTTR issuance on individual borders. ACER does not consider it appropriate, within the scope of the present amendment, to introduce border-specific forward-looking benchmarks or minimum capacity levels. Such an approach would depart from the harmonised methodology proposed by the TSOs and approved as a transitional solution. The methodology also provides for an annual review of the benchmark

Respondents' views		ACER views
	and ongoing dialogue with the Polish transmission system operator (TSO). In this context, a methodology based on historical benchmarks – especially if it includes a cap based on historical values – cannot function as intended and risks locking in a structurally deficient situation. The absence of historical capacity should not justify the continued absence of long-term hedging instruments. We recall that EU legislation, notably Regulation (EU) 2019/943 and the FCA Regulation, requires TSOs to make capacity available to the market and to provide long-term transmission rights unless specific conditions are met. To our knowledge, no such regulatory justification exists for the prolonged absence of LTTRs on the relevant Polish borders. We therefore strongly recommend that alternative, forward-looking approaches be applied for such borders, including the definition of minimum capacity levels or proxy benchmarks.	values under Article 18(8), allowing them to be updated where appropriate to reflect evolving system conditions. ACER therefore maintains that the proposed benchmark methodology represents an appropriate and proportionate transitional approach for the implementation of long-term flow-based capacity calculation.
Austrian Power Grid AG	APG considers it important that a benchmark for the PL-borders is defined in cooperation with PSE, Core NRAs, and ACER, ensuring that the approach is coherent and proportionate.	ACER welcomes APG's support for establishing the benchmark for the Polish borders through cooperation between PSE, the Core TSOs, the Core NRAs and ACER. ACER considers that close cooperation among the relevant parties is essential to ensure that the benchmark is developed in a coherent, proportionate and transparent manner, consistent with the objectives of the transitional long-term flow-based methodology.

Respondents' views		ACER views
EDF	EDF regrets the low availability of LTTRs at the Polish borders.	ACER acknowledges EDF's comments regarding the availability of LTTRs at the Polish borders. ACER notes that, in agreement with ACER and following discussions within the Core framework, PSE proceeded with the calculation of ATC benchmark values for the relevant Polish borders instead of relying on a zero-value assumption. This approach ensures that the benchmark is based on available daily historical data and provides a non-zero reference for the capacity calculation.
Oesterreichs Energie	The special treatment of the Polish border, where national requirements of the past appear to play a decisive role, also seems arbitrary and is, in our view, neither acceptable nor comprehensible. The fact that no capacity has been made available in the past cannot justify a situation where no capacity has to be made available under the new regime either. This exception runs counter to the principle of a common European internal market and does not provide a level playing field.	ACER acknowledges the comments regarding the treatment of the Polish borders and the concerns raised in relation to consistency and equal treatment within the Core CCR. ACER does not consider that the methodology introduces a special or arbitrary treatment of the Polish borders. The ATC benchmark is applied on the basis of principles mutually agreed at Core level and derived from available historical data, in order to ensure a consistent transitional parameter across all relevant borders. The absence or limited availability of LTTRs in the past does not, in itself, predetermine future capacity outcomes.

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		ACER also notes that, following the agreed application of the methodology, benchmark values for the Polish borders have been calculated and are not equal to zero, thereby ensuring a defined reference level within the framework. ACER therefore considers that the approach remains consistent with the principles of non-discrimination and the functioning of the internal electricity market.
Slovenská elektrizačná prenosová sústava, a.s.	It confirms the SEPS position that using the historic ATC benchmark in LT FB CC is not correct and is unacceptable as it is not a truly coordinated capacity calculation approach. SEPS therefore supports to use the historical DA allocation benchmark instead as of go-live.	ACER acknowledges SEPS' comments and its view that the use of historical ATC benchmarks is not appropriate and that day-ahead allocation-based benchmarks should be used instead. The ATC benchmark is introduced as a transitional parameter within the long-term flow-based capacity calculation. ACER is of a view that long-term statistical flow-based approach based on day-ahead capacities is a potential permanent solution and included a recommendation to Core TSOs to consider it in the next amendment. ACER also notes that, following the application of the agreed methodology, benchmark values have been calculated for the relevant borders and

Respondents' views		ACER views
		are not equal to zero, thereby ensuring a defined reference level within the framework. ACER therefore considers that the approach remains consistent with the objectives of the FCA Regulation and the coordinated implementation of the long-term flow-based capacity calculation.

Respondents' views		ACER views
<i>Question 4: Do you have any other comments or concerns related to the Proposal for the amendment to the Core LT CCM? Please explain.</i>		
ENGIE	We have several additional concerns about the proposed amendments: -Review of benchmark values by TSOs As highlighted above, we are concerned that under the proposed amendments, the ATC benchmark values will only be reviewed ex-post, thus limiting the next calendar year allocations to the previous year's ATC values. Since this review mechanism is solely backward-looking and tied to historical ATC outcomes, the benchmark inevitably remains anchored to past NTC-based values. Effectively, this creates a rolling historical cap which does not recognise physical improvements nor upward capacity adjustments, despite the FB domain potentially allowing for higher capacities. -Collateral implications LT FBA can significantly increase collateral requirements. We recommend reviewing collateral methodologies to ensure proportionality and a rapid	ACER acknowledges the concerns raised regarding the annual review of ATC benchmark values, collateral implications, and monitoring and transparency. With regard to the review mechanism, ACER notes that Article 18(8) introduces a structured annual review of the ATC benchmark values by the Core TSOs. ACER does not consider that this constitutes a "rolling cap", as the benchmark is not a capacity limit in itself, but a parameter used solely within the RAM adjustment process. Regarding collateral requirements, ACER notes that collateral frameworks fall under the scope

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	implementation of the alternative collateral calculation as is currently being consulted by ENTSO-E. For the latter, the latest implementation should be by 2027. -Monitoring and transparency We support systematic monitoring of benchmark effects, RAM adjustments, and final allocations to ensure the methodology delivers stable, predictable, and efficient outcomes.	of the harmonised allocation rules pursuant to Article 51 of the FCA Regulation and are therefore not defined by the LT CCM methodology. Nevertheless, ACER agrees to the need to improve the solution which considers collateral requirements during the auction phase (as already envisaged with ACER Decision 18/2023). Following ACER's request for amendments from November 2025, TSOs submitted in June 2026 their proposal for amendment of the harmonised allocation rules to introduce such improved collateral solution. ACER agrees that such solution should be implemented as soon as possible. With respect to monitoring and transparency, ACER agrees that systematic monitoring of benchmark application, RAM adjustments and final allocations is important and considers that the existing governance and reporting framework provides an appropriate basis for such assessment.
Union Française de l'Electricité	UFE regrets that the ENTSO-E proposal in 2025 to include an ATC extraction at the end of the LT capacity calculation process was abandoned. Such an approach should have been considered at least as a temporary measure, until comprehensive investigations were carried out and acceptable solutions to the collateral and the capacity issues were found and implemented.	ACER acknowledges UFE's comments regarding the previous ENTSO-E proposal on ATC extraction, collateral requirements under long-term flow-based allocation, and related methodological developments.

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Beyond the doubts already expressed regarding the added value of the flow based approach for long term horizons, flow-based allocation has inherently negative effects on collaterals, increasing them to a level disproportionate to the risk exposure of TSOs. Indeed, whereas ATC auctions were historically organized on a border-by-border basis, collateral requirements increase under the LTFBA due to the simultaneous allocation of all borders. A collateral cap based on exogenous reference prices (SDAC and forward prices) was therefore implemented in order to cap the maximum payment obligation. UFE points out that this approach is overly conservative and can lead to an over or underestimation of the market clearing price, notably by filtering out bids that would be sustainable at the actual clearing price of the auction. UFE understands that a proof of concept (PoC), based on a methodology relying on clearing prices effectively observed during the auction, has been developed by N SIDE. UFE regrets that this evolution, which shows positive results regarding all investigated KPIs, is conducted outside the scope of the LTFBA and will not be available at the go live scheduled for November 2026.	The decision not to pursue an ATC extraction step at the end of the long-term capacity calculation reflects the overall design choice of the TSOs, as assessed and accepted within the framework of the amended LT CCM. ACER considers that this approach ensures consistency with the coordinated flow-based capacity calculation methodology and avoids introducing additional post-calculation adjustments that could affect the integrity of the flow-based domain. With regard to collateral requirements, ACER notes that these are governed by harmonised allocation rules pursuant to Article 51 of the FCA Regulation and are therefore not defined by the LT CCM methodology. However, ACER agrees that the issue of temporarily blocked collaterals during the auction phase increases under the flow-based approach due to the nature of simultaneous multi-border allocation. The use of collateral caps based on reference prices, as introduced by ACER Decision 18/2023, was considered an acceptable temporary solution to mitigate this issue of increased collateral requirements for the initial go-live of long-term flow-based allocation. However, ACER agrees with the market participants regarding the remaining

Respondents' views		ACER views
		shortcomings of this collateral cap solution and already foresaw the need for further improvements in its decision from 2023. Following ACER's request for amendment, TSOs submitted in June 2026 an amendment proposal for a solution to fully address this issue of inefficient blockage of collaterals during auctions with long-term flow-based allocation. ACER is in on-going discussions with TSOs and the SAP to ensure the improved collateral solution is implemented as soon as possible after the initial go-live of LTFBA and will take a decision on the HAR amendment proposal by December 2026.
Eurelectric aisbl	Eurelectric regrets that the ENTSO-E proposal in 2025 to include an ATC extraction at the end of the long-term capacity calculation process was abandoned. Such an approach should have been considered at least as a temporary measure, until comprehensive investigations were carried out and acceptable solutions to the collateral and the capacity issues were found and implemented. Beyond our doubts already expressed regarding the added value of the flow-based approach for long-term horizon, flow-based allocation has inherently negative effects on collaterals, increasing them to a level disproportionate to the risk exposure of TSOs. Indeed, whereas ATC auctions were historically organized on a border-by-border basis, collateral requirements increase under the LTFBA due to the simultaneous allocation of all borders.	ACER acknowledges Eurelectric's comments regarding the previously discussed ATC extraction approach, collateral requirements under long-term flow-based allocation, and the referenced proof-of-concept work. The decision not to include an ATC extraction step at the end of the long-term capacity calculation reflects the design choice of the TSOs as assessed within the framework of the amended LT CCM. ACER considers that this approach preserves the integrity and consistency of the coordinated flow-based capacity calculation and avoids additional post-

Respondents' views	ACER views
A collateral cap based on exogenous reference prices (SDAC and forward prices) was therefore implemented to cap the maximum payment obligation. Eurelectric points out that this approach is overly conservative and can lead to an over- or underestimation of the market clearing price, notably by filtering out bids that would be sustainable at the actual clearing price of the auction. This concern was validated by a proof of concept (PoC) conducted by N-SIDE on behalf of ENTSO-E to improve the collateral solution. The results of the PoC, which is based on a methodology relying on clearing prices effectively observed during the auction, show positive results across investigated KPIs, suggesting that the approach can strongly mitigate Eurelectric concerns about a damaging collateral burden. Eurelectric regrets that this evolution is not consulted as part of the current amendment proposal and will not be available for the scheduled go-live date of long-term flow-based allocation in November 2026.	processing steps that could affect the definition of the flow-based domain. With regard to collateral requirements, ACER notes that these are governed by harmonised allocation rules pursuant to Article 51 of the FCA Regulation and are therefore not defined by the LT CCM methodology. However, ACER agrees that the issue of temporarily blocked collaterals during the auction phase increases under the flow-based approach due to the nature of simultaneous multi-border allocation. The use of collateral caps based on reference prices, as introduced by ACER Decision 18/2023, was considered an acceptable temporary solution to mitigate this issue of increased collateral requirements for the initial go-live of long-term flow-based allocation. However, ACER agrees with the market participants regarding the remaining shortcomings of this collateral cap solution and already foresaw the need for further improvements in its decision from 2023. Following ACER's request for amendment, TSOs submitted in June 2026 an amendment proposal for a solution to fully address this issue of inefficient blockage of collaterals during auctions with long-term flow-based allocation. ACER is in on-going discussions

Respondents' views		ACER views
		with TSOs and the SAP to ensure the improved collateral solution is implemented as soon as possible after the initial go-live of LTFBA and will take a decision on the HAR amendment proposal by December 2026.
HEP-Trade Ltd, member of HEP group	HEP highlights broader system and market resilience risks that make transparency and deliverability essential. CE/SEE markets face increasing volatility and structural liquidity gaps: Croatia has recently (25th of March and 26th of March 2026) experienced very high day-ahead prices and stress events, and intraday continuous trading has been affected by XBID outages requiring fallback to a local backup solution with very low liquidity. Forward market liquidity in Croatia and much of CE/SEE is structurally limited; without PTR-based physical hedging tools, physical risk is increasingly pushed into DA/ID and much less liquid balancing timeframes. This exposure is compounded by the lack of an effective capacity/adequacy physical urgent measures in much of CE/SEE, increasing reliance on short-term markets and operational interventions during coupling disruptions and extreme volatility. In addition, MCCG discussions indicate proposals to rely only on XBID as fallback for full decoupling of the SDAC (instead of current more liquid shadow auctions), which increases the need for robust, tested fallback playbooks and communication SLAs in LTCC/DA/ID/balancing/capacity measures. Finally, ACER should ensure the LTCC framework remains coherent with acquis-embedded treaty-based physical delivery needs (e.g., Krško corridor) via narrow, transparent, market-neutral accommodations in both the FCA 2.0 and the CACM 2.0 implementing EU regulations and alignment with adequate DA/ID methodologies.	ACER acknowledges HEP's comments regarding recent market stress events, liquidity conditions in CE/SEE markets, XBID operational issues, and broader concerns relating to system resilience and adequacy of hedging instruments. ACER notes that the long-term flow-based capacity calculation methodology is not designed to address short-term market disruptions, operational incidents, or intraday market functioning, which are governed by separate frameworks under the current CACM Regulation, FCA Regulation, and the balancing framework. With regard to intergovernmental arrangements, ACER recalls that EU law prevails over provisions of international or bilateral agreements between Member States. Accordingly, any such arrangements can only be taken into account within the methodology to the extent that they are compatible with

Respondents' views	ACER views
	Union law and the applicable regulatory framework. ACER further considers that the LT CCM has been developed in line with the currently applicable Union acquis, including full alignment with the existing CACM and FCA frameworks, as well as coherence with the intraday (SIDC) and day-ahead (SDAC) capacity calculation methodologies. References to future legislative developments, including possible revisions of the CACM and FCA frameworks, are not part of the present assessment. ACER therefore considers that the concerns raised, while relevant in a broader market context, do not require modifications to the LT CCM amendment under assessment. The long-term flow-based capacity calculation and allocation was already defined for the Core region in 2021 (including SI-HR border), and the new amendment does not represent any change in that sense. The competition for the capacity at SI-HR border has already been present with the currently applied long-term ATC allocation. Moreover, the ATC benchmark proposed by ACER for the direction SI-HR is increased for 100 MW to mitigate any

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		concerns for the delivery of the Croatia part of NPP Krsko production in the transitional period. Finally, ACER is not entitled to provide any priority access to any market participant, regardless of any inter-governmental agreement, as the European law prevails over any such agreement. The parties of the IGA are encouraged to seek for applicable solutions under the current European legislation, and Core/European market practice, including consideration of purely financial products at long term. Regarding Krsko corridor, see section 6.3.2 of the Decision.
URSO/RONI	Since the proposed (LT) ATC adjusted historical benchmark values clearly based on an uncoordinated CC methodology, CI socialization Articles will (likely) not enter into force. If, for the sake of practicability and the deeply recognized need of GO-LIVE of the Core LT CCM (incl. 1st amendment), the transitional solution was adopted, we: propose: a) CI socialization CAP set to 10% during the transitional period, or then 0% since based on ""uncoordinated""	ACER acknowledges URSO comments. The CI socialisation i.e. usage of a common CCR pot for the LTTR remuneration is inherent to flow-based approach and is expected to be consistently applied in this case as well. ACER's simulations have shown no significantly detrimental effect on any Core TSOs. Further potential amendments of the CiD methodology are out of scope of this process.

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propose and require: b) Statistical Flow-Based CC methodology: - a clear and stricte obligation of the TSOs to submit the methodology in time to allow for GO-LIVE of Statistical FB methodology starting 01.01.2028 (delivery), - i.e.: * if current amended methodology to be adopted until 06/2026, * then submission of amendment of the methodology above until 12/2026 (there is no need to wait for approval procedures, since scenario-based FB method mutually considered as not feasible), * its approval until 03/2027 * with latest GO-LIVE 01.01.2028 (yearly and January auction in 11/2027) c) further: - a clear and valid legal certainty and reassurance, that no later than in 2 years the new, non-transitional solution and methodology will be in force and adopted - not to be left for TSOs only, and that the transitional phase automatically ceases to be in force - clearly defined and binding ""what if not scenario"" - statistical evaluations and test runs ACER - TSOs - promised by ACER, to show possible outcomes under new adjusted (LT) ATC values with the granted exceptions	Re-evaluation of ATC benchmark is envisaged in the amendment.

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	- clearly defined cost/benefit sharing, if these runs show disproportionate results, with more than statistically minor operational and financial impacts on some TSOs d) mandatory reevaluation of the adopted (LT) ATC adjusted benchmark values, not only by the TSOs to decide upon; but allowing NRAs and ACER to act on their own. The principal of fairness must strictly be upheld.	
Energy Traders Europe	Energy Traders Europe would like to reiterate that long-term capacity calculation must ensure predictable, stable, and sufficient capacity to support forward markets and effective hedging. While the introduction of the ATC benchmark represents a step in the right direction, it remains an indirect and non-binding mechanism. In its current form, it does not fully replace the role previously played by long-term allocation (LTA) inclusion in safeguarding capacity availability, especially as it is subject to Individual Validation Adjustments (IVAs) applied by TSOs, which can further jeopardise the effective capacity. The recent ENTSO-E policy paper on forward markets also highlighted TSOs' reluctance to issue LTTRs, exacerbating these concerns and underscoring the need to guarantee a minimum level of capacity for market participants. We are also concerned that, in practice, the benchmark could act as an upper limit on capacity, similar to the previously proposed MaxATC concept, which we have opposed. Any such limitation would be inconsistent with the EU obligation to maximise capacity made available to the market, while respecting operational security. We therefore recommend:	ACER acknowledges Energy Traders Europe's comments. The ATC benchmark is introduced as a transitional parameter within the long-term flow-based capacity calculation and is intended to provide a structured reference input based on historical data. It does not permanently replace a fully coordinated long-term capacity calculation. ACER takes note of the concerns regarding transparency and methodology robustness. These aspects are addressed through the governance framework of the LT CCM, including reporting, publication of relevant parameters, and the possibility of review under Article 18(8). ACER also notes the importance of continued stakeholder engagement and considers that implementation experience and monitoring of

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	- Strengthening the link between benchmark values and actual capacity outcomes - Enhancing the transparency of the methodology - Ensuring that no artificial constraints are introduced that could limit efficient cross-border trading. Finally, we encourage continued stakeholder engagement and the publication of sensitivity analyses to assess the impact of benchmark assumptions on capacity calculation and market outcomes.	outcomes will be relevant for assessing the performance of the methodology over time.
Austrian Power Grid AG	APG considers the timely approval of this amendment, as well as the related Core DA CCM amendment on the Removal of Long-Term Inclusion (RLI), essential to maintaining the revised implementation timeline. Given the challenges encountered in earlier phases, implementation in November 2026 now appears feasible, provided that the approval process does not introduce any unforeseen changes requiring additional adjustments. Should such changes arise, there would be a risk of delays to the planned go-live in November 2026.	ACER welcomes APG comments and agrees that the amendment should not impose a risk to the planned go-live date.
EDF	EDF regrets that the ENTSO-E proposal in 2025 to include an ATC extraction at the end of the LT capacity calculation process was abandoned. Such an approach should have been considered at least as a temporary measure, until comprehensive investigations were carried out and acceptable solutions to the collateral and the capacity issues were found and implemented. Beyond our doubts already expressed regarding the added value of the flow-based approach for long-term horizons, flow-based allocation has inherently negative effects on collaterals, increasing them to a level disproportionate to the risk exposure of TSOs. Indeed, whereas ATC auctions	ACER acknowledges EDF's comments regarding the previously discussed ATC extraction approach, collateral requirements under long-term flow-based allocation, and the referenced proof-of-concept work. The decision not to include an ATC extraction step at the end of the long-term capacity calculation reflects the methodological design choice of the TSOs, as assessed within the framework of the amended LT CCM. ACER

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were historically organized on a border-by-border basis, collateral requirements increase under the LTFBA due to the simultaneous allocation of all borders. A collateral cap based on exogenous reference prices (SDAC and forward prices) was therefore implemented in order to cap the maximum payment obligation. EDF points out that this approach is overly conservative and can lead to an over or underestimation of the market clearing price, notably by filtering out bids that would be sustainable at the actual clearing price of the auction. EDF understands that a proof of concept (PoC), based on a methodology relying on clearing prices effectively observed during the auction, has been developed by N SIDE. EDF regrets that this evolution, which shows positive results regarding all investigated KPIs, is conducted outside the scope of the LTFBA and will not be available at the go live scheduled for November 2026.	considers that this approach ensures the integrity and consistency of the coordinated flow-based capacity calculation and avoids introducing additional post-processing steps that could affect the definition of the flow-based domain. With regard to collateral requirements, ACER notes that these are governed by harmonised allocation rules pursuant to Article 51 of the FCA Regulation and are therefore not defined by the LT CCM methodology. However, ACER agrees that the issue of temporarily blocked collaterals during the auction phase increases under the flow-based approach due to the nature of simultaneous multi-border allocation. The use of collateral caps based on reference prices, as introduced by ACER Decision 18/2023, was considered an acceptable temporary solution to mitigate this issue of increased collateral requirements for the initial go-live of long-term flow-based allocation. However, ACER agrees with the market participants regarding the remaining shortcomings of this collateral cap solution and already foresaw the need for further improvements in its decision from 2023. Following ACER's request for amendment, TSOs submitted in June 2026 an amendment

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		proposal for a solution to fully address this issue of inefficient blockage of collaterals during auctions with long-term flow-based allocation. ACER is in on-going discussions with TSOs and the SAP to ensure the improved collateral solution is implemented as soon as possible after the initial go-live of LTFBA and will take a decision on the HAR amendment proposal by December 2026.
Oesterreichs Energie	In general, we claim for the following points: 1. A clearer reference for minimum capacities on all borders in rejecting the proposed unequal treatment of the DE-AT border. 2. We express concerns that the ATC benchmark, in its current form, may act as a cap on available capacities and is subject to Individual Validation Adjustments (IVAs) by TSOs, potentially limiting effective capacity. 3. We highlight the persistent allocation constraints observed at the Polish borders, which undermine the effectiveness of long-term transmission rights.	ACER acknowledges the concerns raised regarding minimum capacity levels, the role of the ATC benchmark, and allocation outcomes at specific borders. With regard to the DE–AT border, ACER notes that the benchmark values are derived from a methodological approach proposed by the Core TSOs with taking into consideration historical record of allocated capacities, and the fact that the 100% of DE-AT value is widely considered as too extensive. ATC benchmark was a necessary patch to ensure stability of allocated capacities in the transitional period until the fully coordinated long-term calculation is applied. ACER does not expect systematic IVA application but the Core TSOs, as there is no direct influence of

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		the LT capacities on the DA capacities. Finally, the ATC benchmark values are to be re-evaluated at least on yearly basis. ACER agrees that, as the PL bilateral LT capacities are calculated based on day-ahead statistical allocation, and when there is no direct link to DA capacities (no LTA inclusion at DA), there should be no systematic usage of PL allocation constraints.
Slovenská elektrizačná prenosová sústava, a.s.	SEPS does not agree with the overall principle of adjusting long-term flow-based domains based on historical uncoordinated long-term ATC values. SEPS opposes the general concept considering it to be highly artificial and failing to meet the basic requirements of fairness, transparency and non-discrimination. According to SEPS, the Proposal cannot and does not present the coordinated LT CC methodology if it is established on the uncoordinated historical values while, at the same time, does not take account of the specificities of the individual borders. In addition, the methodology is highly complicated and the contribution to economic surplus or increased hedging opportunities is not evident or even negative. Furthermore, it does not solve the major problems inherent to the LTFB approach (risk of very low/no capacities at some borders, lack of visibility on the allocated volumes from one year to another, higher collaterals for market participants, flawed objective function of the allocation algorithm, opposition from market participants, etc.).	ACER acknowledges SEPS' comments regarding the use of historical ATC values, the complexity of the methodology, and the concerns raised on fairness, transparency, non-discrimination, and overall efficiency of the long-term flow-based capacity calculation. ACER agrees that the current approach, which incorporates historical ATC benchmark values, does not yet constitute a fully harmonised or fully coordinated long-term capacity calculation methodology in the strict sense. At the same time, ACER considers that it represents an important and necessary transitional step towards a fully coordinated and harmonised LT framework at Core level.

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	Implications of misconception of the approach is further articulated by uncapped socialisation of the remuneration costs and removal of the LTA inclusion from the DA process.	The ATC benchmark is applied as a transitional parameter derived from historical datasets and integrated across Core borders. ACER further notes that the methodology is designed to balance multiple objectives, including transparency and gradual integration of historical practices into a coordinated framework. ACER therefore considers that, while further development towards full coordination remains an objective, the current methodology constitutes a meaningful and important step in that direction.