

Determination of capacity calculation regions

Explanatory note

2 July 2025

Disclaimers:

(1) This explanatory document is submitted by all TSOs to the Agency for the Cooperation of Energy Regulators for information and clarification purposes only accompanying the “All TSOs’ proposal for amendment of the Determination of capacity calculation regions methodology in accordance with Article 15(1) of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management.”

(2) Please note that this explanatory document is non-binding.

I. Introduction and rational to this document

Following the informal Guidance by ACER to ENTSO-E, TSOs and NEMOs on how to draft proposals for terms and conditions or methodologies dated March 2023, ACER strongly welcomes that the proposals are accompanied by an explanatory document for information purposes. This explanatory document will not be approved by ACER.

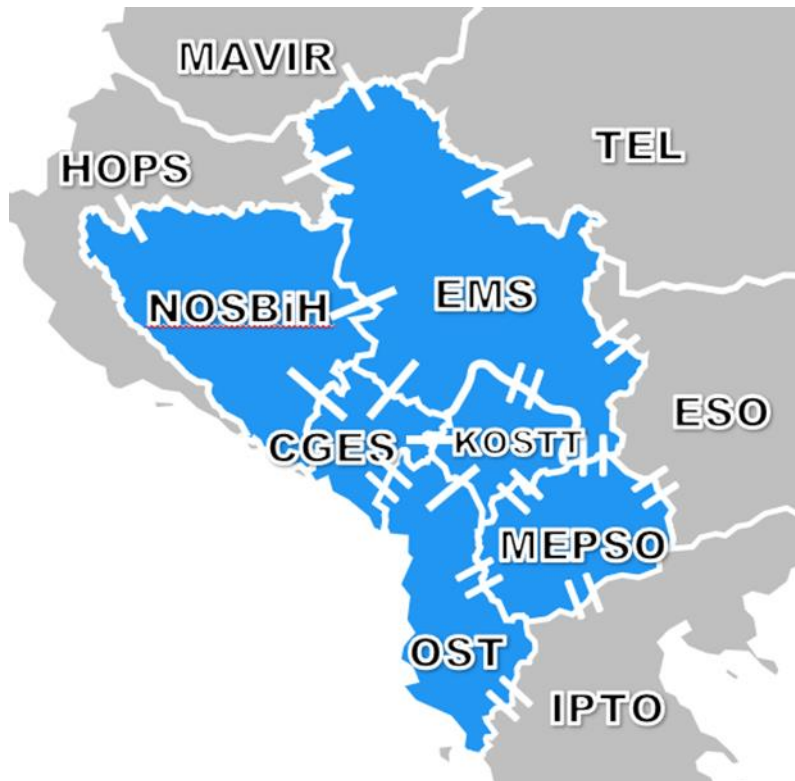
The explanatory document should describe the options considered during the development of the proposal, the views of stakeholders as expressed during the public consultation, a clear and robust justification for including or not the views resulting from the consultation, as well as the justifications and arguments for the choices made in the proposal.

II. ECE CCR

1. Network security and coordinated capacity calculation requirements

By Decision 2022/03/MC-EnC the Ministerial Council of the Energy Community incorporated a legislative package comprising the latest EU electricity acquis binding for the Energy Community. The Decision adapted and adopted Regulation (EU) 2019/943, Regulation (EU) 2019/942, the Guidelines on Forward Capacity Allocation (FCA GL), Capacity Allocation and Congestion Management (CACM GL), Electricity Balancing (EBGL), System Operation Guideline (SOGL), and the Network Code on Emergency and Restoration (ERNC).

In December 2024, the WB EnC TSOs - considering the goal of regional and pan-European coordination as enshrined in the EU legislation and the ENTSO-E Articles of Associations – issued the Joint Declaration on Regional Coordination in Southeast Europe. WB EnC TSOs supported by neighbouring EU TSOs proposed a reconfiguration of the default Shadow SEE CCR (as defined in Annex I of EnC CACM). The WB EnC TSOs proposed reconfiguration that would attribute mutual bidding zone borders of EMS, CGES, and NOSBIH (WB3 TSOs) and WB3 border with neighbouring EU TSOs (HOPS, MAVIR, TRANSELECTRICA) to the Core/CE CCR and the bidding zone borders of OST, KOSTT, and MEPSO to the SEE CCR. They consider the proposal to be technically justified and aimed at accelerating the integration of non-EU TSOs into the EU regulatory framework, reducing the total number of CCRs in line with ACER's strategic guidance, enhancing network security and capacity calculation efficiency and avoiding fragmentation of highly interdependent bidding zone borders across different CCRs.



TSOs concluded that proposed reconfiguration would improve the security of operation of the Continental Europe SA. A daily contingency analysis is not sufficient in this context, a systematic observation of weak points in the entire synchronous area offers better insight.

For example, when examining the consequences of the two largest disturbances in the last twenty years—namely the system splits of 2006 and 2021, both of which impacted the entire synchronous area—it becomes evident that the system split lines in Croatia, Hungary, Serbia, and Romania nearly overlapped in both cases. This indicates the presence of a structural weak point in the connection between the southeastern part of the system and the rest of the synchronous area.

Such systemic weaknesses must be considered in capacity calculation. This necessity was also recognized in the *Continental Europe Synchronous Area Separation on 08 January 2021 – Final Report*, where Recommendation No. 5 states:

„The capacity calculation shall be performed in a coordinated manner in each Capacity Calculation Region. The coordinated capacity calculation has to consider existing stability limits“which is justified by „A regional approach is a way to examine the situation holistically so as to overcome the shortcomings of coordination that occur with the application of only the bilateral approach. Dynamic stability limits can only be seen by analysing the wider region “.

Therefore, it is necessary to establish a region in which capacity calculation and coordinated security analysis can be done, in such a way that the wider area around the system split line is included. That region is already partly established as Core (Central Europe) CCR, but that it should be supplemented by the northern bidding zone borders of EMS and NOSBiH. Recognizing the importance of the Western Trans-Balkan corridor for optimal configuration, it is necessary to add in CCR the CGES control area northern bidding zone borders as well.

This is supported by Recommendation No. 7 as proposed by the Expert Panel: “The possibility of developing a more sustainable solution for CCC and CSA for non-EU TSOs in the Balkans area and

between these TSOs and neighbouring EU TSOs should be assessed in order to increase the system security and ensure a proper level of TSOs cooperation”

And it is further justified by the current situation „Currently non-EU TSOs in the Balkans area do not belong to any CCR, despite the flows within them and within neighbouring EU TSOs having an influence on the CCC in both the Core and SEE CCRs. The capacity calculation is usually left to bilateral agreements without a proper coordination among the different bidding zone borders (both non-EU and EU) and this impacts the system security of the entire scheduling area “.

Additionally, the proposed solution can be implemented most quickly, offers the optimal ratio of effort to results, leads most directly to the target solution, enables the non-EU TSOs of the Western Balkans to align with the implementation timeline of European energy regulations, and—last but not least—facilitates the achievement of political consensus around them. During the daily operational capacity calculation process, a Core-non Core interconnectors are taken into account, in line with Article 5 of Core DA CCM, therefore a high number of Core-non-Core CNECs are part of the Core capacity calculation process at the following bidding zone borders: AT-IT, AT-CH, D4-CH, D7-CH, HR-BA, HR-RS, HU-RS, HU-UA, PL-UA, RO-RS, RO-UA, SK-UA.

The Number of CNEs and CNECs included in operational Core Day ahead capacity calculation process where those between Core CCR and WB6 are in Table below, marked in bold font:

Table. Number of CNEs and CNECs included in Core DA CC

BZB	CNEs	CNECs
AT-IT	1	2
AT-CH	2	8
D4-CH	9	68
D7-CH	3	34
HR-BA	3	14
HR-RS	1	4
HU-RS	1	21
HU-UA	4	70
PL-UA	1	32
RO-RS	1	26
RO-UA	1	26
SK-UA	1	10

These CNE(C)s are significantly impacted by exchanges within Core CCR. Some interconnectors toward non-Core bidding zones exhibit the highest zone-to-zone PTDF values.

Between the Western Balkan bidding zones, several transmission lines exhibit a strong influence from cross-zonal exchanges within the Core region, therefore it would be logical to include them in the Core CCR capacity calculation process. For example, those are:

- DV 400kV Ugljevik – Mitrovica with an average z2z PTDF value equal to 13%,
- DV 400kV Trebinje – Lastva with an average z2z PTDF value equal to 13%,

These values indicate significant interdependencies between the Core CCR and the EMS, CGES, and NOSBiH bidding zones. Such influences must be taken into account to ensure that available capacities are accurately reflected in the market. Additionally, within the highly meshed and flow-interdependent region consisting of the SLO–AT–HU–HR–BA–RO–RS–ME bidding zones, use of a flow-based as a target solution is justified.

On the other hand, considering both the ongoing merger of the CE CCR in the day-ahead timeframe and the future CE merger activities proposed by this amendment, as well as the uncertainties coming from the ongoing transposition of the Electricity Integration Package into the national legislation of the WB3 countries and their technical readiness, the immediate accession of WB3 TSOs would risk delaying the CE merger timeline.

Therefore, the following agreement was reached between CE and WB3 TSOs:

As a first step, WB3 TSOs together with neighbouring EU TSOs, will establish a interim ECE CCR with scope limited to coordinated day ahead capacity calculation - which will be implemented once EIP has been fully transposed into national legislation by all WB3 countries.

Following the go-live of the CE Day-Ahead Capacity Calculation process, and once the ECE CCR fulfils all necessary conditions:

- Full transposition of the EIP into national legislation,
- Full implementation of ECE day-ahead capacity calculation processes, and
- Active participation in the Single Day-Ahead Coupling

Accession of the ECE CCR to the CE CCR can be initiated.

2. Chronology

Hereunder the steps that initiated the amendment of the CCR determination proposal are summarized:

(a) Regional coordination process (WB EnC TSO and neighbouring EU TSOs) has been finalised upon issuing of Joint Declaration on Regional Coordination in Southeast Europe, 03.12.2024;

- Principles of a reconfiguration of the default Shadow SEE CCR (as defined in Annex I of EnC CACM) has been discussed on several meetings on regional level between ENTSO-E, WB EnC

TSO and neighbouring EU TSOs and were practically concluded on the workshop in Athens, 02.10.2024;

- Additionally, multiple coordination and discussion meetings between ENTSO-E, WB EnC TSO, neighbouring EU TSOs, ACER and EnC took place;

(b) Formal request of ACER, 30.01.2025

- ACER requested in a letter that all TSOs develop an amendment of the Determination of CCRs in order to include the capacity calculation regions of the Energy Community;
- ACER requested to submit the amendment proposal by 31.07.2025.

(c) Drafting a proposal to amend the Determination of CCRs Methodology in order to include the capacity calculation regions of the Energy Community.

- By 14.4.2025 WB3 TSOs and CE TSOs agreed on creation of interim ECE CCR and conditions for ECE CCR accession to CE CCR and initiated the finalization of the CCR determination amendment.

3. Options considered and motivations

First considered option is default configuration of the Shadow SEE CCR as defined in Annex I of the EnC Regulation (EU) 2015/1222 (CACM GL). As TSOs identified significant challenges to its implementation, alternative have been identified – immediate WB3 TSOs accession to Core/CE. Detailed analysis of the alternatives suggested that there are more suitable solutions than the default configuration. In addition to already described technical advantages, advantage of the proposal is that overall number of CCRs will be reduced if Shadow SEE CCR is not established, and its borders are attributed to the existing CCRs.

The second option—immediate accession of WB3 TSOs—was deemed unfeasible for the reasons outlined above. Consequently, as a third option WB3 and CE TSOs agreed to establish an interim ECE CCR with a limited day-ahead scope and jointly defined conditions for the future accession of the ECE CCR to the CE CCR. EnC TSOs are committed to the application of the existing TCMs and already established processes in CORE/CE CCR, once accession conditions are fulfilled. Together with the reduction of total number of CCRs, this approach enables faster operationalisation of the coordinated capacity calculation, as adherence to the operational processes is, in principle, faster than establishment of the new ones.

III. SEE CCR

1. Background

By Decision 2022/03/MC-EnC the Ministerial Council of the Energy Community incorporated a legislative package comprising the latest EU electricity acquis binding for the Energy Community. The Decision adapted and adopted Regulation (EU) 2019/943, Regulation (EU) 2019/942, the Guidelines on Forward Capacity Allocation (FCA GL), Capacity Allocation and Congestion Management (CACM GL),

Electricity Balancing (EBGL), System Operation Guideline (SOGL), and the Network Code on Emergency and Restoration (ERNR). This Decision, also, involved establishment of Shadow SEE CCR including specific bidding zone borders that are defined in EnC Regulation (EU) 2015/1222 (EnC CACM) (bidding zone border between Romania, Bulgaria and Greece, attributed respectively to: Transelectrica - Compania Nationala de Transport al Energiei Electrice S.A., ESO – Electroenergien Sistem Operator EAD and IPTO - Independent Power Transmission Operator S.A.). According to Article 1(2) of Annex I of this Regulation, it is possible, also, to propose adjustments of the configuration of the proposed Shadow SEE CCR.

Based on practical experience and regional system security developments, Western Balkans TSOs, together with neighboring EU TSOs (further refer to as “the TSOs”) proposed a reconfiguration of the SEE CCR, which they consider technically justified and targeted towards accelerating the integration of non-EU TSOs to the EU regulatory framework. By reducing the total number of CCRs – in line with ACER’s strategic guidance, network security and capacity calculation efficiency would be enhanced and fragmentation of highly interdependent bidding zone borders across different CCRs, would be also avoided.

The proposal includes terminating the Shadow SEE CCR and redistributing its borders into existing CCRs (primarily SEE CCR and CORE/CE CCR), adhering to the principle that strongly interdependent borders should belong to the same CCR.

2. Options considered and motivations

While the default configuration of the Shadow SEE CCR is defined under Annex I of the EnC Regulation (EU) 2015/1222 (CACM GL), SEE TSOs identify significant challenges to its implementation. The proposal of terminating Shadow SEE CCR seems the best way forward and is in accordance with the ACER Decision 6/2016 on the definition of the capacity calculation regions, which, under Chapter 5.8 *Overall number of CCRs and its evolution over time*, prescribes that:

- With the exception of the CWE-CEE CCR merger, ACER broadly agrees with TSOs that the CCRs proposal represents a pragmatic approach, which will need progressively to evolve towards a smaller number of CCRs.
- To ensure such an evolution, ACER considers important that the relevant TSOs regularly review the definition of CCRs in the light of forthcoming developments (in particular regarding infrastructure developments, bidding zone reconfiguration, level of interdependencies between regions and with respect to the conditions set out in Article 15(3) and Article 20(5) of the CACM Regulation) and propose amendments when appropriate with a view of reducing the number of CCRs as defined under its Decision.
- Since the CACM Regulation aims at extending market coupling beyond the EU borders, ACER stresses the importance to prepare the future extension of CCRs to third countries well in advance. ACER therefore welcomes that the CCRs proposal provides for a planning for the future extension of the current CCRs, including to third countries.

The preferred solution involves splitting the Shadow SEE CCR and attributing its parts to the existing SEE and CORE/CE CCRs and thus the amended SEE CCR would cover most of the geographical area of Balkan peninsula. This provides a reduction in the number of CCRs, facilitating more efficient capacity calculation and improves regional security across all timeframes, as well as minimization of operational fragmentation, as closely linked bidding zone borders are no longer split across different CCRs.

Given the high number of borders within the Shadow SEE CCR, assigning all of them to one existing CCR was deemed impractical, as it would overburden current implementation projects and challenge TSOs and NEMOs in meeting regulatory deadlines.



Border between Core (Central Europe) and SEE CCRs

3. Inclusion of North Greek borders to the SEE CCR

TSOs of Greece (IPTO), Bulgaria (ESO), and Romania (Transelectrica) (further refer to as “SEE CCR TSOs”) have recently jointly developed an amendment of the SEE Capacity Calculation Methodology (SEE CCM), within the DA-ID timeframe, which was approved by the SEE CCR NRAs in September 2023. This amended methodology incorporates to the NTCs calculation at the North Greek borders, the borders of Albania -Greece (GR-AL), North Macedonia-Greece (GR-MK) and Turkey–Greece (GR-TR), complementary to the NTC calculation at the Greece-Bulgaria (GR-BG) border.

The amended methodology considers the general principles and goals set in the CACM Regulation, while respecting the principles set in the Regulation (EC) 2019/943, one of which being the 70% requirement for the minimum Margin Available for Cross Zonal Trade (MACZT). In other words, for the compliance with the 70% MACZT requirement under the EU Electricity Regulation at the North Greek borders, this methodology calculates, in a coordinated way, cross-zonal capacities at all the North Greek borders, considering the non-EU neighbouring TSOs as technical counterparties. The capacities at the North Greek borders are highly interdependent to the added borders (as it is shown in the next section) and so, their incorporation is necessary for the fulfillment of the 70% requirement at these borders.

In addition to the above, the SEE CCR TSOs have included in ROSC, RDCT and RDCT cost sharing methodologies of the SEE CCR the possibility of their neighboring non-EU TSOs to join as technical counterparties to coordinate with them the remedial actions with cross border relevance.

3.1 The dependency of the capacity of the GR-BG border on the Greek-non-EU borders

Data from the SELENE CC KPI reports show that the cross-zonal capacities at the North Greek borders are highly interdependent. The dependency of the NTC capacity of the GR-BG border from the Greek-

non-EU borders can be illustrated by using the results calculated up to now for the NTC of the BG-GR border by using the capacity calculation methodology of the SEE CCR.

According to the SEE CCM, the Total Transfer Capacity (TTC) at the North Greek borders is determined by the limiting CNEC (Critical Network Element with Contingencies -CNEC) at these borders. The NTC on the BG-GR border is derived from the total TTC value at the North Greek borders using predefined splitting factors. Hence, there is a strong interdependency of the BG-GR NTC and the limiting CNEC at the North Greek borders.

Based on the CNECs results for 2024 shown in Table 1, which are included in the SELENE CC KPI annual report for 2024, it is evident that the 400 kV tie-line of Bitola-Meliti acted as the most frequently limiting critical network element at the North Greek borders for the coordinated capacity calculation procedure during the reporting period.

Direction	BG>GR	GR>BG
Limiting CNE	Bitola - Meliti	Bitola - Meliti
	97.03%	98.59%

Table. Cases (in %) with the limiting CNE for the NGR borders for 2024

Moreover, flows on the GR-AL and GR-MK bidding zone borders are strongly correlated with flows on AL-ME, AL-XK, MK-XK, and XK-ME bidding zone borders. Including these borders in the SEE CCR aligns with the principle that interdependent bidding zone borders should belong to the same CCR.

3.2 Conclusions

The incorporation of the borders Albania – Greece (AL-GR) and North Macedonia – Greece (MK-GR) in the SEE CCR is vital for the fulfillment of the 70% requirement at the North Greek borders. Unless the capacities at the North Greek borders are calculated with the new amended SEE CCM which incorporates the above borders, IPTO would not be able to meet EU obligations regarding MACZT and system security.

Furthermore, the inclusion of the borders Albania – Greece (AL-GR) and North Macedonia – Greece (MK-GR) at the current SEE CCR is vital not only for the fulfillment of the 70% requirement but for the assurance of system security at the SEE region. SEE CCR TSOs have included Albania and North Macedonia in their redispatching-countertrading and cost sharing methodologies as technical counterparties, in order to coordinate with them, remedial actions with cross border relevance.

In general, the proposed SEE CCR reconfiguration, when implemented, will benefit the SEE region as a whole as it supports compliance with EU MACZT obligations, enhances system security through coordinated cross-border remedial actions with non-EU TSOs, aligns with the long-term objective of consolidating CCRs as promoted by ACER, resolves implementation hurdles associated with the Shadow CCR concept and last but not least, offers a technically sound, efficient, and politically viable path forward for regional integration.

4. Inclusion Justification for Albania–Montenegro (AL-ME) and Albania–Kosovo* (AL-XK) bidding zone Borders

The capacity of the Albania–Montenegro (AL-ME) and Albania–Kosovo* (AL-XK) bidding zone borders is significantly influenced by their integration within the South-East Europe Capacity Calculation Region (SEE CCR). These bidding zone borders have a considerable impact on the cross-zonal capacities originating from the Albania–Greece (AL-GR) bidding zone border, with power flows on the AL-ME and AL-XK bidding zone borders showing a strong correlation with those on the AL-GR bidding zone border.

Data from the SCC N-X security analysis indicate frequent overloading of the 220 kV tie-lines Koplik–Podgorica (AL-ME) and Fierza–Prizren (AL-XK) under various contingency scenarios. These lines consistently rank among the most critical and limiting network elements on Albania’s borders during capacity calculation processes.

Border	AL-XK	AL-ME
Critical network element	TIE Fierza–Prizren	TIE Koplik–Podgorica
	49.94%	42.96%

Table 1 Cases (in %) with the limiting CNEC for the AL borders for 2024

The inclusion of the AL-ME and AL-XK bidding zone borders in the SEE CCR is therefore essential to ensure the security and reliability of the regional electricity system. Given the critical role these borders play in regional power flows and their strong interdependence with other key cross-border corridors, coordinated capacity calculation and congestion management are necessary.

IV. Eastern Europe CCR

1. Background

The Eastern Europe Capacity Calculation Region (EE CCR) has been established as a default CCR according to Annex I of the CACM Regulation, as adapted and adopted by Ministerial Council Decision 2022/03/MC-EnC (hereafter “EnC CACM”). Such Default CCR configuration includes the bidding zone borders sbetween

- Ukraine and Moldova (UA - MD), concerning PJSC "National Power Company" "Ukrenergo" and I.S. Moldelectrica.
- Ukraine - Poland (UA - PL), concerning PJSC "National Power Company" "Ukrenergo" and Polskie Sieci Elektroenergetyczne S.A
- Ukraine - Slovakia (UA - SK), concerning PJSC "National Power Company" "Ukrenergo" and Slovenská elektrizačná prenosová sústava, a.s.
- Ukraine - Hungary (UA - HU), concerning PJSC "National Power Company" "Ukrenergo" and MAVIR Hungarian Independent Transmission Operator Company Ltd
- Ukraine - Romania (UA - RO), concerning PJSC "National Power Company" "Ukrenergo" and Compania Natională de Transport al Energiei Electrice “Transelectrica” S.A
- Moldova . Romania (MD - RO), concerning I.S. “Moldelectrica” and Compania Natională de Transport al Energiei Electrice “Transelectrica” S.A .

2. Options considered and motivations

The EE CCR has been already defined in the as Annex I of the EnC CACM Regulation as a default configuration; therefore, this configuration has been transposed as such in the Determination of CCRs. The proposal now clearly includes the list of all borders included in the EE CCR.

V. IT – ME CCR

1. Background

The Italy- Montenegro (IT-ME) Capacity Calculation Region (CCR) has been established as a default CCR according to Annex I of the CACM Regulation, as adapted and adopted by Ministerial Council Decision 2022/03/MC-EnC (hereafter “EnC CACM”). Such Default CCR configuration includes the bidding zone border between Italy and Montenegro, attributed to TERNA Rete Elettrica Nazionale S.p.A (TERNA) and Crnogorski elektroprenosni sistem AD (CGES).

The proposal to amend the determination of CCRs under Commission Regulation (EU) 2015/1222 is including also the IT-ME CCR, as per ACER request to All TSOs dated 30th January 2025.

2. Options considered and motivations

The IT-ME CCR has been already defined in the as Annex I of the EnC CACM Regulation as a default configuration; therefore, this configuration has been transposed as such in the Determination of CCRs.

VI. Merger of Core and Italy North CCRs for ID CC, ROSC, RDCT and CS

1. Background

Following ongoing merger activities in CE CCR in the day ahead timeframe, as well as the obligations arising from Article 13(3) of the Determination of CCRs, approved in March 2024, TSOs are required to work on full merge using a stepwise approach and taking into account potential interdependencies with existing regional implementation projects. To fulfil this requirements, CE TSOs drafted and agreed with CE NRAs and ACER on the roadmap for full merge of the of the CCRs Core and Italy North into the CCR Central Europe for all CCR-related methodologies. The roadmap was developed with the objective of achieving the full merger as quickly as possible by merging projects based on their current maturity level, while simultaneously minimizing overall efforts and avoiding potential delays to the already established go-live dates for Core and Italy North.

The proposed amendment is the outcome of the agreement on Roadmap, but currently covers only the merger of IDCC, ROSC, RDCT, and CS. At this stage, it is considered premature to amend the method

for BTCC, as its implementation will come as the last one in pipeline, after the CE ROSC. Similarly, it is also premature to amend the CCR proposal for LTCC, given the ongoing implementation of the Core LTCC and the fact that the CE LTCC solution will be highly dependent on the future FCA 2.0. This approach also ensures that priority commonly set by TSOs, NRAs and ACER for merging IDCC, ROSC, and CS are not hindered by initiating work on additional CE methodologies that are not yet required.

It is important to highlight that during the drafting and agreement process, the CE TSOs confirmed that the implementation of the CE ROSC and CS merger will not cause delays compared to the anticipated go-live dates for the same projects in Core CCR. In case that certain risks of delay arise and are not solved until a predefined point of time, the Core ROSC and CS projects will be implemented as originally planned in this region, with the CE ROSC and CS implementation to follow afterward.

Regarding IDCC, the plan is to implement the CGMES-based IDCC solution directly within CCR CE, skipping the interim step of a regional implementation.

The full merger of all CCR-related obligations remains a firm commitment and responsibility of the TSOs.

2. TIMELINE

Hereunder the steps that initiated the amendment of the CCR determination proposal are summarized:

(a) **Inter-Regional coordination process with final workshop in Vienna, 04.04.2025**

- The principles for the further merger of Core and Italy North CCRs for all CCR-related obligations, as well as the topic of the WB3 accession, were discussed and concluded at inter-regional level between ACER, CE NRAs, and TSOs
- Prior to this concluding workshop on inter-regional level, multiple coordination and discussion meetings between the most impacted parties took place
- In parallel, an agreement was reached between the CE TSOs and the WB3 TSOs on the creation of the ECE CCR and its conditional accession to the CE CCR
- The CE TSOs reaffirmed their commitment to submit an amendment for the further merger, together with the Energy Community (EnC)-related amendment requested by ACER, by 31 July 2025.

(b) **Drafting a proposal** to amend the Determination of CCRs Methodology in order to merge Core and Italy North CCRs.

VII. Conclusion

For all the reasons presented above, TSOs/ENTSO-E propose to amend the Determination of Capacity Calculation Regions to follow the request by ACER to assign EnC borders to respective CCRs and to follow obligations for stepwise Core and Italy North CCRs merger.

VIII. Annex 1 – Public consultation responses

Organisation	Organisation's response to the public consultation, offering the possibility for any remarks on the All TSOs' proposal for amendment of the Determination of capacity calculation regions methodology in accordance with Article 15(1) of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management	Organisation's any other remarks	All TSOs' replies to organisation's response in the public consultation
	I would like to express concern regarding the rigidity of proposed fixed gate closure times (e.g., 30 or 60 minutes), especially in light of increasing cross-border variability due to rapidly changing weather conditions. For instance, in zones like Germany–Netherlands, short-term intraday forecasts are crucial to accurate market signals. A fixed closure risks impairing price responsiveness and undermines alignment with real-time operations — particularly where national markets already allow 5-minute bids. To ensure stability and flexibility, I propose either: • Variable gate closure intervals based on system conditions, or • A hybrid design allowing fine-tuned bid adjustments post-closure up to the final dispatch window. I have also prepared a visual diagram summarizing this recommendation. Please advise if there is a way to attach it within the consultation platform, or if it should be submitted separately.	My previous correspondence addressed to Mr. Shemov: Dear Mr. Shemov, I hope this message finds you well. Although the public consultation on the amendment of the IDCZGCT Methodology officially closed on 24 May 2025, I kindly ask that you consider the following input as part of the stakeholder feedback process, or at least keep it on record for future iterations or discussions. In reviewing the proposed 30-minute gate closure time, I would like to highlight concerns	Thank you for the comment. Please note that this comment is out of scope of this public consultation. This public consultation concerns the All TSOs' proposal for amendment of the Determination of capacity calculation regions methodology developed in accordance with Article 15(1) of the CACM Guideline.

	Thank you for the opportunity to contribute.	about market accuracy in light of increasingly rapid intraday variability—particularly due to shifting weather forecasts in cross-border contexts (e.g. Germany–Netherlands). A rigid 30- or 60-minute closure window may hinder responsive pricing and reduce market alignment with real-time operational realities. This is especially relevant when national markets are already operating with shorter bid submission windows (e.g. 5 minutes). For a brief summary, I’ve attached a visual recommendation emphasizing the need for more flexible timing to preserve price accuracy and system responsiveness. I appreciate your attention and thank you and the ENTSO-E team for facilitating stakeholder dialogue on this important topic.	
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		Best regards,	
Croatian Energy Regulatory Agency (HERA)	HERA supports the amendment proposal. Firmer integration of Core and Italy North is much welcome. HERA greatly supports the firm vision for the interim East Central Europe CCR to merge with Central Europe CCR. In this respect HERA is of the opinion that this amendment proposal is supported by all respective EU and WB6 TSO, and therefore firmly supports the outcome of their mutual cooperation. HERA deems that presented amendment proposal represents very efficient way how more coordination in the south-east part of Europe can be achieved. HERA wants to emphasize that during the workshop held at the beginning of April 2025, all CE NRAs and TSOs preliminary supported the path of 3 TSOs from the Energy Community to gradually join the CE CCR.	N/A	TSOs welcome and take a note of the response of HERA.
Energy Traders Europe	As Energy Traders Europe, we welcome the opportunity to provide feedback on the ENTSO-E Capacity Calculation Regions amendments. Overall, we support enhanced regional coordination, as this may lead to increased cross-border trading capacities, yielding greater economic and societal benefits while furthering European market integration, including outside the borders of the European Union. In this light, we support the current proposal to incorporate the capacity calculation regions of the Energy Community Contracting Parties (while newly created CCRs will only exist during the interim period until full integration into the CE CCR) and the neighbouring countries. Including non-EU TSOs in capacity calculation enhances system security, as these flows have a direct impact on the European grid and provide more	While we welcome the proposed system integration with non-EU TSOs from the Balkan Region and Energy Community contracted parties, we emphasise the necessity of coordinating with all non-EU TSOs, including Switzerland and the UK. We believe that the forthcoming proposals should re-encompass those borders, which are crucial for the proper functioning of the internal energy market. We recognise the political complexities involved, but to ensure system	TSOs take note of this feedback. Regarding the comment addressing the buffer zones, the current CCR proposal addresses an efficient solution suitable for the respective borders to be integrated. CCR determinations are set based on the efficient solution to secure coordinated CC and congestion management. Integration and CCR re-configurations should therefore be based on efficiency in those respective regions and not out of a "one-size-fits-all" principle. Within the CE DA CC, Switzerland will be integrated as an integrated

	cross-border trading opportunities, thereby increasing social welfare. We also welcome the Roadmap for a full merger of Italy North into the CE CCR, as integration into larger regions brings additional benefits. We would like to reiterate our position regarding „buffer regions“ (Hansa) as interim solutions, progressively being integrated into larger areas. In this light, we would welcome the integration of these „buffer zones“ into larger regions during the review of CCR delineations of Hansa, Core, and Nordics. We remind that the development of the methodologies at CCR was intended as an interim stage towards a harmonisation at a later stage. Furthermore, these reviews should occur more periodically (every 4-5 years), accompanied by a comprehensive impact assessment of the current situation and potential changes.	security and facilitate smooth and efficient cross-border electricity trading, further coordination is essential.	technical counterparty (iTCP), with NTC extraction for CH borders conducted from the commonly calculated CE Flow-Based domain. Deeper integration of Switzerland into CCR related processes, such as FB implicit allocation, depends on the approval of the EU–Swiss Electricity Agreement. Regarding the comment on the UK, the TSOs take a note on the future integration of third countries including the UK.
Eurelectric	Eurelectric welcomes the ENTSO-E consultation on the proposed amendments to the Methodology for the Determination of Capacity Calculation Regions (CCRs). Eurelectric acknowledges that the initiative aims to accelerate the integration of non-EU Transmission System Operators (TSOs) into the EU regulatory framework in order to strengthen system security, improve the efficiency of capacity calculation, and prevent the fragmentation of closely interconnected bidding zone borders across multiple CCRs. From a broader perspective, Eurelectric supports the integration of the Energy Community (EnC) into the EU	N/A	The TSOs would like to highlight that the assessment of the proposed CCR configuration is supported with a technical analysis in the explanatory document. Furthermore, the geographical enlargement of a coordinated capacity calculation compared to the current status on the EnC borders will inherently enhance operational security.

	framework, recognizing its potential to enhance coordination and system reliability. However, Eurelectric emphasizes the importance of a gradual and well-managed integration process, underpinned by prior alignment with EU legislation. The recent adoption by the Energy Community's Ministerial Council of a legislative package reflecting the latest EU electricity acquis is an important first step. Ensuring its full and effective implementation is essential for successful integration. That said, the consultation documents currently lack quantitative impact assessments that would allow stakeholders to evaluate the actual benefits of this integration in terms of system security. Furthermore, the long-term plan to merge the transitory ECE CCR with the future Central Europe CCR raises uncertainties, particularly since those CCR are not yet operational. A comprehensive impact assessment of this merger will be necessary once more information on these two CCR becomes available. Additionally, given the uncertainty around the timeline for Energy Community countries to fully transpose the Electricity integration Package into their national legislation, the timeframe for the implementation of this evolution remains difficult to assess. Regarding the Core and Italy North CCRs, following ongoing merger activities in the CE CCR in the day-ahead timeframe, Eurelectric supports, in principle, the proposal to pursue their merger including for the intraday timeframe as well as for the methodologies for regional operational security coordination, coordinated redispatching and countertrading, and cost-sharing mechanisms. Nevertheless, Eurelectric emphasizes that this approach must be pursued with caution to avoid any adverse effects on the		
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	existing CORE capacity calculation process and the EU SIDC mechanisms. Without thorough impact assessments and a clear understanding of how it interacts with current processes, Eurelectric finds it challenging to provide a well-informed opinion. General position on the proposal: Eurelectric reiterates its support for a highly coordinated capacity calculation process both within the EU and at its external borders. However, any expansion of CCRs or mergers must be carefully evaluated in light of the potential interactions between borders and the possible adverse effects on regional capacity calculation processes and their ongoing developments. In this context, Eurelectric is in favour of coordination in capacity calculation to the widest relevant geographical scope considering interdependencies either through the merger of CCRs or through the implementation of processes such as AHC, whatever is the most relevant. Nevertheless, this must be done with the necessary caution to avoid undermining key processes, such as the operational capacity calculation and the EU SDAC and SIDC mechanisms.		
EDF	"EDF welcomes the ENTSO-E consultation on the amendments of the Determination of capacity calculation regions Methodology. EDF takes note that this acceleration of the integration of non-EU TSOs into the EU regulatory framework aims notably at reducing the total number of CCRs to enhance network security and capacity calculation efficiency and at avoiding fragmentation of highly interdependent bidding zone borders across different CCRs.	From a general standpoint, EDF recalls that (i) it supports the idea of an as much coordinated as possible capacity calculation process within the EU borders and at the borders of the EU with third countries but also that (ii) any further addition of borders in a CCR or CCR mergers must be assessed against the possible joint	Regarding the comment on the impact assessment: the TSOs would like to highlight that the assessment of the proposed CCR configuration is supported with a technical analysis in the explanatory document. Furthermore, the geographical enlargement of a coordinated capacity calculation compared to the current status on the EnC borders

	From a general standpoint, EDF supports the integration of the Energy Community (EnC) for network security and capacity calculation efficiency but insists on a smooth and careful integration with, in advance, an adequate alignment with EU rules. EDF takes note that the ministerial Council of the Energy Community incorporated a legislative package comprising the latest EU electricity acquis as binding for the Energy Community. This first step is of the utmost importance and needs to be fully operational for a proper integration. Nevertheless, the consultation documents do not provide any impact assessment with quantitative elements to properly assess the benefits in terms of network security of such an integration. Moreover, in the long term a merger is foreseen with the new Central Europe CCR. At this stage the actual impact of such a merger is hard to assess since neither the interim East-Central Europe CCR nor the Central Europe CCR are yet operational. In time, a thorough impact assessment will be needed. Moreover, since it is not known when the countries from the Energy Community will transpose the Electricity Integration Package, it is hard to appreciate the timeframe of implementation for of this long-term evolution. Regarding specifically the Core and Italy North CCRs, EDF welcomes the proposal to complete their merger into the Central Europe CCR for the intraday timeframe, as well as for the methodologies for Regional operational security coordination, coordinated redispatching and countertrading and redispatching and countertrading cost sharing. EDF supports, in principle, the objective of achieving this merger as quickly as possible while ensuring to avoid any negative impact on the existing CORE capacity calculation process and the EU SIDC mechanisms. In the absence of detailed impact	influence of other borders on power flows and against the possible negative impacts on the capacity calculation processes at regional level and its ongoing evolutions. In this perspective, EDF is favorable to the efficient extension of the flow-based capacity calculation and to extend coordination to the largest geographical extent whenever relevant. However, such an approach should be implemented with the necessary caution to avoid negatively impacting or jeopardizing priority processes, such as the existing operational CORE capacity calculation process and EU SDAC and SIDC processes.	will inherently enhance operational security. Regarding the comment on the CE merger impact on Core processes: the proposed CE merger steps have been endorsed by the CE NRAs, and the CE TSOs are committed to their timely implementation, ensuring no undue delay relative to the Core roadmap. Furthermore, no adverse impact is anticipated on the current Core operational processes and SDAC/SIDC.
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	assessments, EDF considers it difficult to provide an informed opinion."		
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