

Public consultation on the amendment of the SAP and the HAR (2026)

Fields marked with * are mandatory.

Introduction

On 10 June 2026, ACER received proposals from all transmission system operators (TSOs) to amend the harmonised allocation rules (HAR) in accordance with Article 51 of Commission Regulation (EU) 2016/1719 establishing a guideline on forward capacity allocation ('FCA Regulation') and to amend the requirements for the single allocation platform (SAP) and the methodology for sharing costs of establishing, developing and operating the SAP pursuant to Article 49 and Article 59 of the FCA Regulation.

The HAR apply to all allocations of long-term transmission rights ('LTTRs') performed in the European Union by the SAP. These rules provide specifications for the auctioning of long-term transmission rights, including eligibility requirements, provisions on collaterals, use and curtailment of long-term transmission rights, invoicing and payment.

ACER has six months to decide on the amendment proposals and expects to take a decision by 10 December 2026.

To inform its decision-making process, ACER is collecting input from stakeholders. This consultation is addressed to all interested stakeholders in the EU and EEA, including regulatory authorities, market participants and transmission system operators.

Interest stakeholders are invited to respond to this survey **by 7 August 2026, 23:59 hrs (CEST)**.

Data protection

ACER will process personal data of the respondents in accordance with [Regulation \(EU\) 2018/1725](#), taking into account that this processing is necessary for performing ACER's consultation tasks.

More information on data protection is available on [ACER's website](#) and in [ACER's data protection notice](#).

ACER will not publish personal data.

Confidentiality

Following this consultation, ACER will make public:

- the number of responses received;
- company names, unless they should be considered as confidential;
- all non-confidential responses; and
- ACER's evaluation of responses. In the evaluation, ACER may link responses to specific respondents or groups of respondents.

You may request that the name of your company or any information provided in your response is treated as confidential. To this aim, you need to explicitly indicate whether your response contains confidential information.

You will be asked this question at the end of the survey.

☐ I have read the information provided in this section.

Respondent's data

* Country

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland

- ☐ Portugal
- ☐ Romania
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ Switzerland
- ☐ Norway
- ☐ United Kingdom
- ☐ **Other**

*** Name and surname**

50 character(s) maximum

This information will not be published.

*** Company**

50 character(s) maximum

*** Email**

This information will not be published.

Related documents

All TSOs' submission of the HAR and the SAP amendment proposals:

- [HAR amendment proposal](#) submitted to ACER on 10 June 2026
- HAR amendment proposal in [track change version](#) to the currently applicable HAR
- [TSO's explanatory note](#) to the HAR amendment proposal including TSOs' feedback to responses received in their public consultation
- [SAP amendment proposal](#) submitted to ACER on 10 June 2026
- SAP amendment proposal in [track change version](#) to the currently applicable SAP
- [TSOs' explanatory note](#) to the SAP amendment proposal including TSOs' feedback to responses received in their public consultation

Related legal acts:

- [FCA Regulation](#) - Commission Regulation (EU) 2016/1719 establishing a guideline on forward capacity allocation
- [Electricity Regulation](#) - Regulation (EU) 2019/943 on the internal market for electricity
- [ACER Regulation](#) - Regulation (EU) 2019/942 establishing a European Union Agency for the Cooperation of Energy Regulators
- [Transparency Regulation](#) - Commission Regulation (EU) 543/2013 on submission and publication of data in electricity markets

The HAR and the SAP amendment proposals

With the implementation of long-term flow-based allocation, long-term transmission rights for all bidding zone borders within a capacity calculation region will be allocated with a single auction.

Currently, collaterals (i.e. financial security provided by market participants to guarantee their payment obligations) for long-term transmission rights are reserved based on bid prices until the auction is cleared, often leading to an overestimation of collaterals' needs. As long-term flow-based allocation combines multiple bidding zone borders, this over-reservation increases collateral requirements for market participants. This, in turn, may result in unnecessary bid rejections by market participants and potential welfare losses.

To address this, TSOs propose to amend the harmonised allocation rules and the single allocation platform's requirements by introducing a new collateral management solution.

TSOs held a public consultation on the proposed amendments from 5 March 2026 until 9 April 2026 on the [EN TSO-E website](#). The [explanatory note](#) included in the TSOs' submission contains a section with all responses received to the TSOs' public consultation and TSOs' feedback on how these were considered by TSOs for their submitted amendment proposals.

ACER invites all interested stakeholders to share their views on the amendments proposed by the TSOs.

Consultation topics and questions

Collateral Management

Please share your view on the proposed amendments by the TSOs that relates to the improved Collateral Management.

Contestation Period

Please share your view on the proposed amendments by the TSOs that relates to the Contestation Period.

Curtailment Cap for DC Borders

Please share your view on the proposed amendments by the TSOs that relates to the Curtailment Cap for DC Borders.

Changes related to the new auction tool

Please share your view on the proposed amendments by the TSOs that relates to the new auction tool.

REMIT II related amendment

Please share your view on the proposed amendments by the TSOs that relates to REMIT II.

Evolved Flow-Based Allocation (EFB)

Please share your view on the proposed amendments by the TSOs that relates to Evolved Flow-Based Allocation (EFB).

Other comments

Please share any other comment that you might have that relates to the amendments proposed by the TSOs.

Question on confidentiality

* Does your submission contain confidential information?

- ☐ Yes
☐ No

If your submission contains confidential information, you have to claim confidentiality according to Article 27 of [ACER's Rules of Procedure](#).

How to do it:

1. download a PDF version of your submission (see upper right corner of the page);
2. redact confidential information and provide descriptions of the deleted information. Your descriptions must enable any party applying for public access to the documents to determine whether there are sufficient grounds to request ACER to grant access to the information claimed to be confidential. You may use a PDF editor or print out your submission and manually replace confidential information with descriptions;
3. upload the redacted (i.e. non-confidential) version of your submission;
4. upload a separate document with justifications to each of your confidentiality claims.

Please upload the redacted (i.e. non-confidential) version of your submission with the descriptions of the deleted information.

The maximum file size is 1 MB. If your file is bigger, please send it to ACER-ELE-2026-005@acer.europa.eu

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