AmCham Romania Answers to ACER Consultation questions

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

1. Do you consider both the commitment from the CWE and the CEE TSOs to cooperate towards a merger of the CWE and CEE CCRs and the MoU signed on 3 March 2016 as sufficient to ensure that the CWE and CEE regions will develop and implement a common congestion management procedure compliant with the requirements of the CACM Regulation, as well as of Regulation (EC) No 714/2009? Or should the definition of the CCRs provide for a CCR already merging the proposed CWE and CEE regions to ensure compliance with the required common congestion management procedure?

AmCham Romania would not express a position on this question, as it relates to the perception of willingness and effectiveness of cooperation between TSOs from various member states.

2. Do you have comments on the description of the geographical evolution of the CCRs over time, as proposed by all TSOs in Annex 3 to the Explanatory document to the CCRs Proposal?

AmCham Romania considers that the geographical position and importance of the power system of Romania in the region imposes a more careful consideration of Romania’s affiliation in terms of inclusion in CCRs. The inclusion of Romania in both the SEE and CEE regions is the wisest decision possible.

3. Should the CEE region (or a merged region) include the bidding zone borders between Croatia and Slovenia, between Croatia and Hungary, and between Romania and Hungary?
AmCham Romania considers that the bidding zone border between Romania and Hungary should be included in the CEE region.

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

AmCham Romania would not express an opinion on this matter that covers other regions in Europe.

5. Do you have comments on any other new element or development concerning the CCRs Proposal which occurred after the public consultation held by ENTSO-E from 24 August to 24 September 2015?

Not at this stage, but AmCham Romania would follow closely the further evolution of this construction process and will reply to all public consultation procedures that will touch elements of relevance for its members.