### ACER report on the result of monitoring the margin available for cross-zonal electricity trade in the EU

#### Action plans: Overview and main characteristics

<table>
<thead>
<tr>
<th>Country</th>
<th>TSOs</th>
<th>Structural congestion report</th>
<th>Action plan</th>
<th>Relevant CCA</th>
<th>Bidding zone borders or CNECs</th>
<th>Point of linear trajectory in min MACZT% (= MACZT\text{target})</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>NL</strong></td>
<td>TenneT NL</td>
<td>Yes, annex of NRA decision (1)</td>
<td>Date of NRA approval: 15/11/2019 (2)</td>
<td>Approval by Member State: Yes, published December 2019 (3)</td>
<td>Starting/end date of action plan: 01/01/2020 - 31/12/2025</td>
<td>2020: min: 20%, max: 70%, mean: 26%, median: 20%; 2021: min: 28%, max: 70%, mean: 33%, median: 28%</td>
<td>MACZT target defined based on average MCCC for CWE. MNCC contribution not considered</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>CWE CNECs</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>GB-NL (NL side) (future Channel)</td>
<td>70%</td>
<td>No linear trajectory</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>DK1-NL (NL side) (future Hansa)</td>
<td>70%</td>
<td>No linear trajectory</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>NL-NO2</td>
<td>70%</td>
<td>No linear trajectory</td>
</tr>
<tr>
<td><strong>DE</strong></td>
<td>TenneT DE, Amprion, TransnetBW, 50Hz</td>
<td>Yes, 04/07/2019 (4)</td>
<td>Date of NRA approval: 28/11/2020 (5)</td>
<td>Approval by Member State: Sent to ACER 18/12/2019 (6) [7]</td>
<td>Starting/end date of action plan: 01/01/2020 - 31/12/2025</td>
<td>2020: 11.5% (20% minRAM is applied in addition); 21.3%</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>CWE CNECs</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>DE-CZ_PL</td>
<td>11.5%</td>
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</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>DE-PL (Czech Republic)</td>
<td>11.5%</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>DE-DK1 (DE side) (future Hansa)</td>
<td>23.9% from linear trajectory based per CNEC [8]</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>DE-SE4 (DE side) (future Hansa)</td>
<td>41%</td>
<td></td>
</tr>
</tbody>
</table>

### Action plans: Overview and main characteristics

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<tr>
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<th>Bidding zone borders or CNECs</th>
<th>Point of linear trajectory in min MACZT% (MACZTtarget)</th>
<th>Remarks</th>
</tr>
</thead>
<tbody>
<tr>
<td>AT</td>
<td>APG</td>
<td>Yes, HOTSPOT BERICHT on E-Control’s website [12]</td>
<td>24/09/2020 [12]</td>
<td>01/01/2021 - 31/12/2025</td>
<td>CWE APG’s CNECs in Italy North</td>
<td>70% 70% No linear trajectory</td>
<td>ACER was informed about the intention of the AT government to have an action plan, but a decision has not yet been taken</td>
</tr>
<tr>
<td>RO</td>
<td>Transelectrica</td>
<td>Yes, as annex to NRA decision [13]</td>
<td>11/11/2020 [13]</td>
<td>01/01/2021 - 31/12/2025</td>
<td>RO borders (South-East Europe, SEE) RO borders (Core) RO-HU RO-BG RO-HU RO-BG</td>
<td>NA NA 33% NA 20%</td>
<td>No further information received by ACER on the content of the action plan</td>
</tr>
</tbody>
</table>

**Notes referred to in the table:**

2. [https://www.acm.nl/nl/publicaties/goedkeuring-structurele-congestierapport-tennet-tso](https://www.acm.nl/nl/publicaties/goedkeuring-structurele-congestierapport-tennet-tso)
7. In 2020 the starting point is 428 MW, but that might change with new lines. The minimum 1300 MW as “TenneT’s commitment” from DG COMP applies in addition to the starting point.
9. [https://www.e-control.at/documents/1785851/0/Beilage1+-+HHotspot+Bericht+gem+Art+14+Abs+2+EU-VO.pdf/cc107b19-4sad-240-1521-4afe7f684f7f/1601447284360](https://www.e-control.at/documents/1785851/0/Beilage1+-+HHotspot+Bericht+gem+Art+14+Abs+2+EU-VO.pdf/cc107b19-4sad-240-1521-4afe7f684f7f/1601447284360)
10. [https://www.e-control.at/documents/1785851/0/V+ELBM+03_20+Bescheid_HotSpot+Bericht+Art+14_7+final+1v0+20200922.pdf/359d1d42-2441-0da0-63ba-8bd563cca3ef/1601447251935](https://www.e-control.at/documents/1785851/0/V+ELBM+03_20+Bescheid_HotSpot+Bericht+Art+14_7+final+1v0+20200922.pdf/359d1d42-2441-0da0-63ba-8bd563cca3ef/1601447251935)
<table>
<thead>
<tr>
<th>Country</th>
<th>TSOs</th>
<th>Relevant CCA</th>
<th>Respective bidding zone borders or CNECs</th>
<th>Reasons for derogation</th>
<th>Procedural aspects of derogation</th>
<th>Content of derogation request</th>
</tr>
</thead>
<tbody>
<tr>
<td>AT</td>
<td>APG</td>
<td>CWE, AT-CZ_HU_SI (AT side)</td>
<td>• APG’s CNECs in CWE • APG’s NTC bidding zone borders in Core: AT-CZ, AT-HU, AT-SI</td>
<td>• Insufficient concepts and IT tools • Insufficient redispatch potential • Loop flows and Phase Shifting Transformer (PST) flows • Uncertainties due to absence of common coordinated forecast process</td>
<td>None Approved by E-Control. Date of decision: 13/12/2019</td>
<td>Minimum level specified: For NTC borders (AT/CZ, AT/HU and AT/SI): Per border and direction the values that are at least on the same level (on average per border and per direction) as in the last three years. For the Flow Based (FB) border (AT/DE): 20% of Fmax per CNEC for cross-zonal trades within the CWE region and the currently applied process of the long-term capacity inclusion.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1 year Yes</td>
<td>Yes, biannually No</td>
</tr>
<tr>
<td>AT</td>
<td>APG</td>
<td>North Italy, AT-CZ_HU_SI (AT side)</td>
<td>APG’s CNECs in Italy North</td>
<td>• Insufficient concepts and IT tools • Insufficient redispatch potential • Uncertainties due to external flows from 3rd countries • Loop flows and PST flows • Uncertainties due to absence of common coordinated forecast process</td>
<td>None Approved by E-Control. Date of decision: 13/12/2019</td>
<td>Minimum level specified: NTC values that are at least on the same level (on average per direction) as in the last three years.</td>
</tr>
<tr>
<td>BE</td>
<td>Elia</td>
<td>CWE</td>
<td>Elia’s CNECs in CWE</td>
<td>• Loop flows • Lack of redispatching potential in case of planned outage for grid reinforcement • Development of new processes and tools</td>
<td>None Approved by CREG. Date of decision: 05/12/2019</td>
<td>Minimum level specified: Methodology • MACZTmin = 70% - max(0; LFcalculated - LFacceptable) • LFacceptable is 30%-FRM for cross-border CNECs and 50% of (30%-FRM) for internal CNECs, all exchanges considered • Minimum 20% of Fmax in CWE</td>
</tr>
<tr>
<td>BG</td>
<td>EAD</td>
<td>BG-GR (BG side), BG-RO (BG side) (future SEE)</td>
<td>• BG-GR • BG-RO</td>
<td>• Existence of physical power flows with neighbouring non-EU countries • Current inability to apply SEE CCR methodology for coordinated capacity calculation • ESO EAD has no operational experience on the technical implications of conducting a re-dispatching action to increase cross-zonal capacity • Technical limitations of cross-border power flows • Projects for long-term solution - construction of new 400kV transmission lines</td>
<td>None Pending 1 year Yes NA No NA No No Yes NA</td>
<td></td>
</tr>
<tr>
<td>Country</td>
<td>TSOs</td>
<td>Relevant CCA</td>
<td>Respective bidding zone borders or CNECs</td>
<td>Formal disagreement to the derogation request</td>
<td>NRA approval</td>
<td>Duration of derogation</td>
</tr>
<tr>
<td>---------</td>
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</tr>
<tr>
<td>CZ</td>
<td>CEP5</td>
<td>CZ borders (future Core)</td>
<td>Not defined</td>
<td>None</td>
<td>Approved by ERO. Date of decision: 11/12/2019</td>
<td>2 year</td>
</tr>
<tr>
<td>ES</td>
<td>REE</td>
<td>ES FR (ES side) and ES-PT (ES side) until 28/01/2020, SWE from 29/01/2020 onwards</td>
<td>ES-FR ES-PT</td>
<td>None</td>
<td>Approved by CNMC. Date of decision: 17/12/2019</td>
<td>1 year</td>
</tr>
<tr>
<td>CWE</td>
<td>RTE's CNECs in CWE</td>
<td>The main driver for this derogation is the impact of Covid-19 into the technical roadmap targeted six months before.</td>
<td>None</td>
<td>Approved by CRE. Date of decision: 12/12/2019</td>
<td>6 months (01/01/2020-30/06/2020)</td>
<td>Yes</td>
</tr>
<tr>
<td>FR</td>
<td>RTE</td>
<td>ES FR (FR side) until 28/01/2020, SWE from 29/01/2020 onwards</td>
<td>FR-ES</td>
<td>None</td>
<td>Approved by CRE. Date of decision: 18/06/2020</td>
<td>6 months (01/07/2020-31/12/2020)</td>
</tr>
<tr>
<td>North Italy</td>
<td>FR-IT</td>
<td></td>
<td></td>
<td>None</td>
<td>Approved by CRE. Date of decision: 12/12/2019</td>
<td>1 year</td>
</tr>
</tbody>
</table>

Reasons for derogation:
- Absence of CACM-compliant CCM (cNTC or FR)
- Loop flows
- Development and testing of significant methodological changes in CCMs and Capacity Allocation Mechanisms (CAMs)
- ACER Recommendation does not take interdependencies between bidding zone borders into account
- Level of available capacity cannot be calculated

Formal disagreement to the derogation request:
- None

NRA approval:
- Approved by ERO. Date of decision: 11/12/2019
- Approved by CNMC. Date of decision: 17/12/2019
- Approved by CRE. Date of decision: 12/12/2019
- Approved by CRE. Date of decision: 18/06/2020
- Approved by CRE. Date of decision: 12/12/2019

Duration of derogation:
- 2 year
- 1 year
- 6 months
- 6 months
- 1 year

Included minimum level of MACZT:
- No
- NA
- Yes
- No
- Yes
- Yes

Minimum level specified:
- NA
- NA
- 20% of Fmax
- Yes
- Yes

Monitoring requirement (including frequency):
- No
- Yes
- Yes, every two months
- Yes, every month
- Yes, every three months
- Yes, until 30/06/2020
- Yes, until 01/01/2021

Includes a timeline for the adoption of the methodology:
- No
- Yes
- Yes, for development of SWE D-2 CCM: January 2020
- Yes

Includes a timeline for the project:
- No
- Yes
- Yes, for development of SWE D-2 CCM: January 2020
- Yes

Alignment and harmonisation in Capacity Calculation Region (CCR):
- No
- Yes
- Yes
- No

Derogation request includes explanation why TSO cannot publish methodology:
- No
- Yes
- No
- No
- Yes
- No

Content of derogation request:
- None
- None
- None
- None
- None
- None

Procedural aspects of derogation:
- CACM-compliant CCM (cNTC or FR)
- Loop flows
- Development and testing of significant methodological changes in CCMs and Capacity Allocation Mechanisms (CAMs)
- ACER Recommendation does not take interdependencies between bidding zone borders into account
- Level of available capacity cannot be calculated

Formal disagreeament to the derogation request:
- None

NRA approval:
- Approved by ERO. Date of decision: 11/12/2019
- Approved by CNMC. Date of decision: 17/12/2019
- Approved by CRE. Date of decision: 12/12/2019
- Approved by CRE. Date of decision: 18/06/2020
- Approved by CRE. Date of decision: 12/12/2019

Duration of derogation:
- 2 year
- 1 year
- 6 months
- 6 months
- 1 year

Included minimum level of MACZT:
- No
- NA
- Yes
- No
- Yes
- Yes

Minimum level specified:
- NA
- NA
- 20% of Fmax
- Yes
- Yes

Monitoring requirement (including frequency):
- No
- Yes
- Yes, every two months
- Yes, every month
- Yes, every three months
- Yes, until 30/06/2020
- Yes, until 01/01/2021

Includes a timeline for the adoption of the methodology:
- No
- Yes
- Yes, for development of SWE D-2 CCM: January 2020
- Yes

Includes a timeline for the project:
- No
- Yes
- Yes, for development of SWE D-2 CCM: January 2020
- Yes

Alignment and harmonisation in Capacity Calculation Region (CCR):
- No
- Yes
- Yes
- No
- Yes
- Yes

Derogation request includes explanation why TSO cannot publish methodology:
- No
- Yes
- No
- No
- Yes
- No
# Derogation requests for 2020: Overview and main characteristics

<table>
<thead>
<tr>
<th>Country</th>
<th>TSOs</th>
<th>Relevant CCA</th>
<th>Respective bidding zone borders or CNECs</th>
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<th>Content of derogation request</th>
<th>Alignment and harmonisation in Capacity Calculation Region (CCR)</th>
<th>Derogation request includes explanation why TSO cannot publish methodology</th>
</tr>
</thead>
</table>
| GR      | ADMIE (IPTO) | GR northern borders (future SEE) | GR-BG | • Absence of coordinated capacity calculation in SEE CCR  
• Uncertainties in the capacity calculation process related to non-coordinated areas  
• Insufficient redispatch potential to guarantee the 70% capacity criterion  
• Insufficient IT-tools for capacity calculation and validation  
• Absence of consideration of flows of 3rd countries in the capacity calculation | None | Approve by RAE. Date of decision: 15/10/2020 | 1 year | No | NA | Yes, no frequency specified | No | Yes, SEE D-2 CCM to be implemented by the end of 2020 | Yes | NA |
| HR      | HOPS | HR-HU (HR side), HR-SI (HR side) (future Core) | None | • Absence of CACM-compliant CCM (cNTC or FB)  
• Insufficient redispatch potential  
• Lack of redispatching potential in case of planned outage for grid reinforcement | None | Approved by HERA. Date of decision: 17/12/2019 | 1 year | No | NA | No | No | No | No | NA |
| HU      | MAVIR | HU-RO (HU side), HU-SK (HU side), AT-HU (HU side), HR-HU (HU side) (future Core) | None | • Absence of CACM-compliant CCM (cNTC or FB)  
• Consideration of cross-zonal trade over non-EU borders  
• Absence of CACM-compliant redispatching & countertrading (+ cost sharing) methodologies  
• Absence of regional impact | None | Approved by MEKH. Date of decision: 11/12/2019 | 1 year | No | NA | Yes, 6 weeks after end of quarter | No | No | No | No | NA |
| IT      | Terna | All Italy North borders | None | • Uncertainties on external flows from outside the coordination area and from 3rd countries  
• Not enough experience in granting operational security with high cross border capacity and potential high request for remedial actions  
• Development of new processes and tools both at TSO and RSC levels | None | Approved by ARERA. Date of decision: 19/12/2019 | 1 year | No | NA | Yes, quarterly | No | No | No | Yes | NA |
| IT      | Terna | IT internal borders | None | • Alignment with new Bidding-Zone Review (BZR) configuration entering into force in 2021  
• Implementation of proper CCM foreseen in 2020 | None | Partially approved by ARERA for current constraints only. Date of decision: 28/01/2020 | 1 year | No | NA | Yes, periodically | No | Yes, updated CCM foreseen in the course of 2020 | No | NA |
## Derogation requests for 2020: Overview and main characteristics

### Procedural aspects of derogation

<table>
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<tr>
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<th>NRA approval</th>
<th>Duration of derogation</th>
<th>Included minimum level of MACZT</th>
<th>Minimum level specified</th>
<th>Monitoring requirement (including frequency)</th>
<th>Includes a timeline for the adoption of the methodology</th>
<th>Includes a timeline for the projects</th>
<th>Alignment and harmonisation in Capacity Calculation Region (CCR)</th>
<th>Derogation request includes explanation why TSO cannot publish methodology</th>
</tr>
</thead>
<tbody>
<tr>
<td>NL</td>
<td>NL</td>
<td>CWE</td>
<td>TenneT's CNECs in CWE</td>
<td>None</td>
<td>Approved by ACM. Date of decision: 19/12/2019</td>
<td>3 year</td>
<td>Methodology</td>
<td>MACZTmin = MACZTtarget - max(0; LFcalculated - LFacceptable)</td>
<td>MACZTtarget is 70% or action plan levels per CNEC</td>
<td>Yes, monthly</td>
<td>Yes, 01/04/2020</td>
<td>No</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>PL</td>
<td>PSE</td>
<td>PL-CZ, DE, SK (future Core)</td>
<td>PL-DE, PL-CZ, PL-SK</td>
<td>Development of new processes and tools</td>
<td>Approved by URE. Date of decision: 30/12/2019</td>
<td>1 year</td>
<td>Methodology</td>
<td>MACZTmin is 70% or action plan levels per CNEC</td>
<td>MACZTmin is 70% or action plan levels per CNEC</td>
<td>No</td>
<td>NA</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td>PL-SE (PL side) (future Hansa)</td>
<td>PL-SE4 Development of new processes and tools</td>
<td>None</td>
<td>Approved by URE. Date of decision: 30/12/2019</td>
<td>1 year</td>
<td>Methodology</td>
<td>MACZTmin is 70% or action plan levels per CNEC</td>
<td>MACZTmin is 70% or action plan levels per CNEC</td>
<td>No</td>
<td>NA</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>PT</td>
<td>REN</td>
<td>ES-PT (PT side) until 28/02/2020, SWE from 29/02/2020 onwards</td>
<td>PT-ES</td>
<td>Development of new tools for assess in a coordinated manner and validate the potential available remedial actions (considering the already existing grid and generation assets)</td>
<td>Approved by ERSE. Date of decision: 19/12/2019</td>
<td>1 year</td>
<td>Methodology</td>
<td>MNCC is equal to MNCC_{CAlg} + MNCC_{sys}, where MNCC_{sys} is accounting for uncertainties</td>
<td>MNCC is equal to MNCC_{CAlg} + MNCC_{sys}, where MNCC_{sys} is accounting for uncertainties</td>
<td>No</td>
<td>Yes, for development of new processes and tools: 30/06/2020</td>
<td>Yes, for development of new processes and tools: 30/06/2020</td>
<td>Yes</td>
<td>NA</td>
</tr>
<tr>
<td>RO</td>
<td>Translectrica</td>
<td>RO borders (future SEE)</td>
<td>RO-HU, RO-BG</td>
<td>Absence of CACM-compliant CCM (sNTC or FR)</td>
<td>Approved by ANRE. Date of decision: 20/12/2019</td>
<td>1 year</td>
<td>Methodology</td>
<td>MNCC is equal to MNCC_{CAlg} + MNCC_{sys}, where MNCC_{sys} is accounting for uncertainties</td>
<td>MNCC is equal to MNCC_{CAlg} + MNCC_{sys}, where MNCC_{sys} is accounting for uncertainties</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

### Content of derogation request

- **Country**: NL, PL, PT, RO
- **TSOs**: TenneT, CWE, PL-SE, PT-ES, RO boundaries
- **Relevant CCA**: EU
- **Respective bidding zone borders or CNECs**: CWE, PL-CZ, DE, SK (future Core), PL-SE (future Hansa), PT-ES, RO borders (future SEE)
- **Reasons for derogation**: Formally disagreed to the derogation request
- **Formal disagreement to the derogation request**
- **NRA approval**
- **Duration of derogation**
- **Included minimum level of MACZT**
- **Minimum level specified**
- **Monitoring requirement (including frequency)**
- **Includes a timeline for the adoption of the methodology**
- **Includes a timeline for the projects**
- **Alignment and harmonisation in Capacity Calculation Region (CCR)**
- **Derogation request includes explanation why TSO cannot publish methodology**

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**ACER report on the result of monitoring the margin available for cross-zonal electricity trade in the EU**

Publication date: 18 December 2020
Version: 1.0
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<th>Content of derogation request</th>
</tr>
</thead>
<tbody>
<tr>
<td>SE</td>
<td>SvK</td>
<td>DK1-SE3 (SE side), DK2-SE4 (SE side), NO1-SE3 (SE side) (future Nordic)</td>
<td>Reasons for derogation</td>
<td>Formal disagreement to the derogation request</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• SE3-NO1 • SE3-DK1 • SE4-DK2</td>
<td></td>
<td>Approved by Ei. Date of decision: 19/12/2019</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Structural congestion at the West Coast Corridor</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>• Currently using the NTC capacity calculation approach, which does not efficiently and precisely define the limiting network elements as only a FB representation of the network can achieve. Data that can be utilised for defining the starting point of a linear tractor in a future action plan, to reach CEP 70% requirement, is not in hand yet</td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td>• Lack of downregulation volumes makes SvK unable to meet the CEP 70% requirement from 2020 without endangering operational security in a N-1 situation.</td>
<td></td>
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</tr>
<tr>
<td></td>
<td></td>
<td>DE-SE4 (SE side), PL-SE4 (SE side) (future Hansa)</td>
<td></td>
<td></td>
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<tr>
<td></td>
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<td>• SE4-DE • SE4-PL</td>
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<td>LT-SE4 (SE side) (future Baltic)</td>
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<td>SE4-LT</td>
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<tr>
<td>SK</td>
<td>SEPS</td>
<td>CZ-SK (SK side), HU-SK (SK side), PL-SK (SK side) (future Core)</td>
<td>Not defined</td>
<td>Absence of CACM-compliant CCM (cNTC or FB)</td>
</tr>
</tbody>
</table>
## Derogation requests for 2021: Overview and main characteristics

**Table:**

<table>
<thead>
<tr>
<th>Country</th>
<th>TSOs</th>
<th>Relevant CCA</th>
<th>Respective bidding zone borders or CNECs</th>
<th>Reasons for derogation</th>
<th>Procedural aspects of derogation</th>
<th>Content of derogation request</th>
</tr>
</thead>
<tbody>
<tr>
<td>AT</td>
<td>APG</td>
<td>CME, AT-CZ_HU_SI (AT side)</td>
<td>APG’s CNECs in CME, APG’s NTC bidding zone borders in Core: AT-CZ, AT-HU, AT-SI</td>
<td>Ongoing work on IT concepts and implementation</td>
<td>Formal disagreement to the derogation request</td>
<td>MACZTmin = MACZTtarget - max(0; LFcalculated - LFacceptable)</td>
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<tr>
<td></td>
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<td></td>
<td></td>
<td>NRA approval</td>
<td>30% - FRM for cross-border CNECs and 30% of (30% - FRM) for internal CNECs, all exchanges considered</td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td>Duration of derogation</td>
<td>MNCC is equal to MNCCmacro + MNCCmicro, where MNCCmicro accounting for uncertainties</td>
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<td>Included minimum level of MACZT</td>
<td>None 1 year (2021) Methodology</td>
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<td></td>
<td>Minimum level specified</td>
<td>Yes, report deviations, no frequency</td>
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<td>Monitoring requirement (including frequency)</td>
<td>Yes, Q2 2021</td>
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<td>Includes a timeline for the adoption of the methodology</td>
<td>Yes, Q2 2021 for IT tools</td>
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<td>Includes a timeline for the projects</td>
<td>Partially with BE &amp; PL</td>
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<td>Alignment and harmonisation in CCR</td>
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<td>Derogation request includes explanation why TSO cannot publish methodology</td>
<td>NA</td>
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<td>North Italy, AT-CZ_HU_SI (AT side)</td>
<td>APG</td>
<td>APG’s CNECs in Italy North</td>
<td>Not finished development and testing of the necessary IT-Tools for the calculation of the MACZTmin criterion (defined in the action plan) in the capacity calculation area</td>
<td>Not finished development and testing of the necessary IT-Tools for the validation of the calculated capacities under consideration of the MACZTmin criterion (defined in the action plan)</td>
<td>Duration of derogation</td>
<td>Minimum level is specified as the same level (on average per direction) as in the last 3 years.</td>
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<td>Included minimum level of MACZT</td>
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<td>Minimum level specified</td>
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<td>Monitoring requirement (including frequency)</td>
<td>Yes, end of Q2 2021</td>
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<tr>
<td>BE</td>
<td>Elia</td>
<td>CWE</td>
<td>Elia’s CNECs in CWE</td>
<td>Loop flows</td>
<td>Formal disagreement to the derogation request</td>
<td>MACZTmin = 70% - max(0; LFcalculated - LFacceptable)</td>
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<td>NRA approval</td>
<td>50% of (30% - FRM) for internal CNECs, all exchanges considered</td>
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<td>Duration of derogation</td>
<td>Minimum 20% of Fmax in CWE</td>
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<td>Minimum level specified</td>
<td>Daily, reporting deviations on loopflow derogation every trimester</td>
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<td>Includes a timeline for the adoption of the methodology</td>
<td>Yes, 01/07/2021 Report detailing methodologies and projects</td>
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<td>CZ</td>
<td>CEPS</td>
<td>CZ borders (future Core)</td>
<td>Not defined</td>
<td>Reliability margins to cover uncertainties and inaccuracies, loop flows and internal flows exceed 30% of the transmission capacity; Inexistent regional coordinated calculation and transmission capacity allocation; Inexistent operational agreements with the neighbouring transmission system operators; Transmission capacity calculation cannot be additionally improved for further transmission capacity increases.</td>
<td>Formal disagreement to the derogation request</td>
<td>MACZTmin = 60% - max(0; LFcalculated - LFacceptable)</td>
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<td>NRA approval</td>
<td>50% of (30% - FRM) for internal CNECs, all exchanges considered</td>
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<td>Minimum 20% of Fmax in CWE</td>
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<td>Includes a timeline for the projects</td>
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<th>Content of derogation request</th>
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</thead>
<tbody>
<tr>
<td>ES</td>
<td>BEE</td>
<td>SWE</td>
<td>+ ES-FR + ES-PT</td>
<td>The temporary lack of a remedial action validation tool</td>
<td>None</td>
<td>Approved by HERA. Date of decision: 24/11/2020</td>
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<td></td>
<td>1 year (2021) Yes 20% of Fmax No No Yes No</td>
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<tr>
<td>FR</td>
<td>RTE</td>
<td>SWE</td>
<td>FR-ES</td>
<td>The temporary lack of a remedial action validation tool</td>
<td>None</td>
<td>Approved by HERA. Date of decision: 24/11/2020</td>
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<td>1 year (2021) Yes 75% of hours, including 3rd country flows: + SK-HU border/import direction: 10% + AT-HU border/import direction: 25% + HR-HU border/import direction: 10% No No No No No</td>
</tr>
<tr>
<td>HR</td>
<td>HOPS</td>
<td>HR-HU (HR side), HR-SI (HR side) [future Core]</td>
<td>+ HU-HR + HU-SI</td>
<td>Time necessary to build the required tools to adequately take into account power flows within and outside the Core CCR; Limited redispatching activation potential; Long-term planned network element disconnections.</td>
<td>None</td>
<td>Approved by HERA. Date of decision: 24/11/2020</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>1 year (2021) Yes 70% capacity for 70% of the relevant hours Yes, regularly No No Yes No</td>
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<tr>
<td>HU</td>
<td>MAVIR</td>
<td>HU-RO (HU side), HU-SK (HU side), AT-HU (HU side), HR-HU (HU side) [future Core]</td>
<td>+ HU-HR + HU-AT + HU-RO + HU-SK + HU-SI (from end 2021)</td>
<td>Absence of CACM-compliant CCM (i.e. ITC or FB) Consideration of cross-zonal trade over non-EU borders Absence of CACM-compliant redispatching &amp; countertrading (+ cost sharing) methodologies Absence of regional impact Operational security problems coming from uncertainties and assumptions in the coordinated (mostly bilateral) CC</td>
<td>None</td>
<td>Approved by HERA. Date of decision: 24/11/2020</td>
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<td>1 year (2021) Yes 75% of hours, including 3rd country flows: + SK-HU border/import direction: 10% + AT-HU border/import direction: 25% + HR-HU border/import direction: 10% No No No No No</td>
</tr>
<tr>
<td>IT</td>
<td>Terna</td>
<td>North Italy</td>
<td>All Italy North borders</td>
<td>Ongoing work on IT concepts to compute margins and adjust the minimum capacity accordingly The presence of allocation constraints related to voltage and stability constraints for the Italian system</td>
<td>None</td>
<td>Approved by HERA. Date of decision: 24/11/2020</td>
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<td></td>
<td>1 year (2021) No NA</td>
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</tbody>
</table>

### Table notes:
- **Reasons for derogation**
  - Formal disagreement to the derogation request
  - NRA approval
  - Duration of derogation
  - Included minimum level of MACZT
  - Minimum level specified
  - Monitoring requirement (including frequency)
  - Includes a timeline for the adoption of the methodology
  - Includes a timeline for the projects
  - Alignment and harmonization in CCR
  - Derogation request includes explanation why TSO cannot publish methodology

- **Procedural aspects of derogation**
  - Time necessary to build the required tools to adequately take into account power flows within and outside the Core CCR
  - Limited redispatching activation potential
  - Long-term planned network element disconnections

- **Content of derogation request**
  - Approval by HERA
  - Date of decision
  - Duration
  - Minimum level specified
  - Monitoring requirement (including frequency)
  - Includes a timeline for the adoption of the methodology
  - Includes a timeline for the projects
  - Alignment and harmonization in CCR
  - Derogation request includes explanation why TSO cannot publish methodology

- **Monitoring requirement**
  - Frequency
  - Duration
  - Compliance

- **Alignment and harmonization in CCR**
  - Timeline for the adoption of the methodology
  - Timeline for the projects
  - Compliance

- **Derogation request**
  - Explanation why TSO cannot publish methodology

- **Content of derogation**
  - Approval by HERA
  - Date of decision
  - Duration
  - Minimum level specified
  - Monitoring requirement (including frequency)
  - Includes a timeline for the adoption of the methodology
  - Includes a timeline for the projects
  - Alignment and harmonization in CCR
  - Derogation request includes explanation why TSO cannot publish methodology
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</table>
| NL      | TenneT NL |        | CWE, TenneT's CNECs in CWE | Loop flows, Lack of redispatching potential in case of (i) unplanned outages and (ii) planned outages for grid reinforcement | Approved by ACM. Date of decision: 16/11/2020 | Methodology:  
- \( \text{MACZT}_{\text{min}} = \text{MACZT}_{\text{target}} - \max(0; \text{LF}_{\text{calculated}} - \text{LF}_{\text{acceptable}}) \)  
- \( \text{LF}_{\text{acceptable}} \) is 30%-FRM for cross-border CNECs and 50% of (30%-FRM) for internal CNECs, only CWE exchanges considered  
- Minimum 20% of \( F_{\text{max}} \) in CWE  
- \( \text{MACZT}_{\text{target}} \) are action plan levels per CNEC  
- Daily, reporting deviations on loop flows derogation, monthly  
- Includes a timeline for the adoption of the methodology  
- Includes a timeline for the projects  
- Alignment and harmonisation in CCR | Derogation request includes explanation why TSO cannot publish methodology |
| GB-NL (NL side) (future Channel) | NL-GB |        | NL-GB | Loop flows, Lack of redispatching potential in case of (i) unplanned outages and (ii) planned outages for grid reinforcement | Approved by ACM. Date of decision: 16/11/2020 | No No  
- Yes, monthly in case of reduction | |
| DK1-NL (NL side) (future Hansa) | NL-DK1 |        | NL-DK1 | Loop flows, Lack of redispatching potential in case of (i) unplanned outages and (ii) planned outages for grid reinforcement | Approved by ACM. Date of decision: 16/11/2020 | No No  
- Yes, monthly in case of reduction | |
| PL | PSE |        | PL-CZ, DE, SK (future Core) | Loop flows, Uncertainties of the non-coordinated transit flows | 1 year (2021) | Methodology:  
- \( \text{MACZT}_{\text{min}} \) is 70% or Action Plan levels per CNEC  
- \( \text{LF}_{\text{acceptable}} \) is \( [100\% - \text{MACZT}_{\text{min}}] \cdot F_{\text{max}} \cdot \text{FRM} \) for cross-border CNECs and 10% of \( [100\% - \text{MACZT}_{\text{min}}] \cdot F_{\text{max}} \cdot \text{FRM} \) for internal CNECs  
- \( \text{MNCC} \) is equal to \( \text{MNCC}_{\text{transit}} + \text{MNCC}_{\text{max}} \cdot \text{MNCC}_{\text{margin}} \), where \( \text{MNCC}_{\text{margin}} \) is accounting for uncertainties | |
| PT | REN |        | SWE, ES-PT | The temporary lack of a remedial action validation tool | 1 year (2021) | Yes  
- Yes, 70% capacity for 70% of the relevant hours. No specific information on the scope of the ‘relevant’ hours is included.  
- Yes, regularly  
- No  
- No  | NA |
# Derogation requests for 2021: Overview and main characteristics

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<tbody>
<tr>
<td>SE SvK</td>
<td>DK1-SE3 (SE side), DK2-SE4 (SE side), NO1-SE3 (SE side) (future Nordic)</td>
<td>• SE3-NO1 • SE3-DK1 • SE4-DK2</td>
<td>Operational security • Congestion in the West Coast Corridor, inside bidding zone SE3, in combination with the lack of downregulation volumes makes SvK unable to meet the CEP 70% requirement in 2021 without endangering operational security in a N-1 situation.</td>
<td>None</td>
<td>Approved by Ei. Date of decision: 01/07/2020</td>
<td>1 year (2021)</td>
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<td>SE</td>
<td>DE-SE4 (SE side), PL-SE4 (SE side) (future Hansa)</td>
<td>• SE4-DE • SE4-PL</td>
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<td>None</td>
<td>Approved by Ei. Date of decision: 01/07/2020</td>
<td>1 year (2021)</td>
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<td>LT-SE4 (SE side) (future Baltic)</td>
<td>SE4-LT</td>
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<td>SK SEPS</td>
<td>CZ-SK (SK side), HU-SK (SK side), PL-SK (SK side) (future Core)</td>
<td>• SK-CZ • SK-PL • SK-HU • SK-UA (3rd country)</td>
<td>Operational security of the connected systems</td>
<td>None</td>
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