



# **REQUEST FOR AMENDMENT BY ALL HANSA NRAS ON THE PROPOSAL OF ALL TSOS OF THE HANSA CAPACITY CALCULATION REGION FOR THE COORDINATED REDISPATCHING AND COUNTERTRADING METHODOLOGY IN ACCORDANCE WITH ARTICLE 35 OF THE COMMISSION REGULATION (EU) 2015/1222 OF 24 JULY 2015 ESTABLISHING A GUIDELINE ON CAPACITY ALLOCATION AND CONGESTION MANAGEMENT**

02 October 2018

## **1 INTRODUCTION**

On 16 March 2018, the Transmission System Operators within the capacity calculation region Hansa: TenneT, Svenska Kraftnät, PSE, 50 Hertz, and Energinet (“Hansa TSOs”) and also Statnett, issued a proposal for the Coordinated Redispatching and Countertrading Methodology for the Hansa region in accordance with Article 35 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management (“Regulation 2015/1222”), hereinafter “the proposal”.

The Hansa NRAs, ie Bundesnetzagentur, Energimarknadsinspektionen, Urząd Regulacji Energetyki, and Forsyningstilsynet, and also Autoriteit Consument & Markt and Norges vassdrags- og energidirektorat have in cooperation analysed the proposal and come to the common conclusion that the proposal needs to be amended before it can be approved on national level by each NRA. Therefore, according to Article 9 (12) of Regulation 2015/1222 the Hansa NRAs request the Hansa TSOs to submit an amended proposal that considers the comments presented in this document.



## 2 Comments on the draft proposal

### General remarks:

1. Several articles in the method limit the method to very narrowly and precisely defined situations. There is a risk that such limitations could open up for future disputes over the applicability of the method. We propose that TSOs consider this. It is NRAs' understanding that the methodology should cover all possible redispatch and countertrade with cross-border relevance in CCR Hansa (Regulation 2015/1222 art. 35(2+4)).

### Specific remarks:

2. Whereas (11) and Article 4.3 seem to discuss the same things. The text should be updated to avoid repeating texts.
3. Whereas (8): Please elaborate (in the explanatory document) how the availability of the identified measures is ensured in the following time frames.
4. Article 2 (2): Please elaborate in explanatory document on how it would be handled if more than one RSC services CCR Hansa. There should only be one CCC per CCR, please also consider Regulation 2015/1222 art. 29(2).
5. Article 3 (1): Please give examples in explanatory document of what "*appropriate mechanisms and agreements*" could be. The article itself should include general principles for what could be considered appropriate.
6. Article 4 (1)(a): Please explain in explanatory document how can it be ensured that the full list of possible RD&CT measures is supplied by each TSO. It should be clear what is the total set from which the TSOs can supply RD&CT measures. Is there a limit or a boundary condition either geographically or based on the flow effect of the RD&CT on Hansa borders?
7. Article 4.1 (c) states that "when identifying appropriate RD and CT measures, each RSC shall coordinate with RSCs of other CCRs". It is unclear how this coordination should be arranged and what the outcome of the coordination will be. Are all RSCs aware of this arrangement?
8. Article 4.3 (c) could be interpreted as meaning that the TSO may choose not to follow the RCS's proposal for action without making any motions and can choose not to make a counter proposal. It seems strange that the TSO according to Article 4 (3c) could refuse the recommended action without the obligation to come up with an alternative action. It should be ensured that an agreement is reached in due time and the congestion will be removed.



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9. Article 6 does currently not address what happens when the Hansa RSC or Hansa TSOs need to request RD&CT from adjacent CCRs. These cases need to be included in the cross-regionally coordination.
10. Article 6: Furthermore, the Hansa methodology cannot impose restrictions on the reasons given by TSOs in other CCRs for coordination of RD&CT. It could be due to the other CCR carrying out operational security analysis, as currently included in art. 6(1)(a), but it could also be any other reason the other CCRs have included in their own methodologies.