



Mr Christian Zinglensen
Director
ACER

Cc: Dr Florian Ermacora
Head of Unit
Internal Energy Market DG ENER
European Commission

Cc: Mr Laurent Schmitt
Secretary General
ENTSO-E

By email only

27 March 2020

Dear Christian,

I write on behalf of all Regulatory Authorities of the Core region¹ (Core NRAs) regarding the proposals for the coordination and the cost sharing of redispatching and countertrading (RDCT proposals) submitted by Transmission System Operators of the Core region (Core TSOs) in accordance with Article 35 and Article 74 of Commission Regulation (EU) 2015/1222 of 24 July 2015 (CACM Regulation).

Article 9(10) of the CACM Regulation requires Core NRAs to consult and closely cooperate and coordinate with each other in order to reach an agreement, and make a decision within six months following receipt of submissions to the last NRA. The last Regulatory Authority received the RDCT proposals on March 27, 2019. After a common request from Core NRAs pursuant to Article 6(10) of Regulation (EU) 2019/942, ACER has extended the period for reaching an agreement by 6 months. A decision was therefore required by each NRA by March 27, 2020.

The proposals submitted on March 27, 2019 were largely incomplete. Indeed, Core TSOs expected the experimentation to provide solid ground to build the final RDCT proposals. The results of this experimentation were made available to Core NRAs on February 20 and March 13, 2020. Considering the initial incompleteness remained and considering the recent finalization of the experimentation results, Core NRAs were not able to approve nor request an amendment of the TSO proposals.

Core NRAs also underline that Regulation (EU) 2019/943 of the European Parliament and of the council of 5 June 2019 on the internal market for electricity (hereafter the recast electricity regulation) entered into force in the middle of the examination process. This regulation includes several provisions affecting significantly the content of RDCT proposals and the different approaches foreseen when building the experimentation.

¹ Regulatory Authorities of Austria, Belgium, Croatia, Czech Republic, France, Germany, Hungary, Luxembourg, Netherlands, Poland, Romania, Slovakia and Slovenia.

For this reason, Core NRAs have summarized their views on how these provisions should be implemented in the RDCT proposals. These views are included in the non-paper attached to this referral letter. This non-paper establishes the common ground found by Core NRAs and highlights the key points of divergence.

Yours sincerely,

Sven Kaiser
Chair of the Core Energy Regulators' Regional Forum