

Public consultation on ACER's 2023 market monitoring report on cross-zonal capacities and the 70% margin available for cross-zonal electricity trade (MACZT)

Fields marked with * are mandatory.

Objective

The objective of this consultation is to gather views from stakeholders regarding the findings of ACER's market monitoring report on '**Cross-zonal capacities and the 70% margin available for cross-zonal electricity trade (MACZT)**'. Based on the findings of the report and the stakeholders' input gathered, ACER will issue a formal opinion to the European Commission and European Parliament by the end of 2023.

Target group

This consultation is addressed to all interested stakeholders, including market participants, regulatory authorities, nominated electricity market operators, and transmission system operators.

Contact and deadline

The contact point for this consultation is: ewpmm@acer.europa.eu

All interested stakeholders are invited to submit their comments **by 15 September 2023, 23.59 hrs (CET)**.

More information on ACER's monitoring of cross-zonal capacities is available [here](#).

General terms of the consultation

* Name of the respondent

* Email

* Company

* Country of origin (headquarters)

* Countries where your company is active

* Activity

* Should the following answers to this public consultation be treated as confidential?

- Yes
 No

The Agency will publish all non-confidential responses, and it will process personal data of the respondents in accordance with Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data, taking into account that this processing is necessary for performing the Agency's consultation task. For more details on how the contributions and the personal data of the respondents will be dealt with, please see the [Agency's Guidance Note on Consultations](#) and [the privacy statement](#) referred to this consultation.

General feedback - Evolution of cross-zonal capacity levels

To what extent do you agree with the conclusions illustrated in ACER's 2023 market monitoring report on cross-zonal capacities and the 70% margin available for cross-zonal electricity trade (MACZT)?

- Strongly agree.
 Agree.
 Neutral.
 Disagree.
 Strongly disagree.

What changes would you suggest for future editions of ACER's cross-zonal capacity report?

We suggest for future editions to include chapter with concrete, feasible and realistic measures to proceed with elimination of not fulfilment of MACZT targets.

Based on the data presented in Chapter 1 of ACER's report, do you believe that the current development of cross-zonal capacities across the EU is sufficient to enable the integration of European electricity markets?

- Yes
- No

Please clarify your answer.

Question is not clear.

Margin available for cross-zonal trade in the EU in 2022

Considering the results of the monitoring exercise of 2022, do you believe that enough progress is being made across the EU to fulfil the 70% cross-zonal transmission capacity target by 2026?








- Yes
- No

Please clarify your answer.

TSOs across EU are making progress to fulfil the 70% MACZT target by 2026, however achieving 70% MACZT on all CNECs for all MTUs shall not be ultimate goal and shall always be based on "cost-benefit" evaluation.

In ACER's report, several elements are presented as critical limitations to the achievement of the 70% cross-zonal transmission capacity target. Please rank them by order of relevance:

5 stars correspond to the biggest threat.

Lack of a mechanism to share remedial actions costs	 
Lack of sufficient remedial actions	 
Suboptimal bidding zone configuration and resulting loop flows	
Lack of sufficient grid developments	 



Do you see any other threat to the achievement of the 70% target?

For some TSOs in FB CC CCR this target is almost unreachable especially for CNECs that are highly loaded in zero balance model - e.g. lines close to a substations to which big generating powerplants are connected. This threat can be solved by changing the MACZT calculation logic/assessment approach for such specific CNECs...

What would be the key enabler(s) for reaching the 70% target by 2026?

One of the key enablers for reaching the 70 % target by 2026 would be a change in MACZT calculation logic /assessment approach for CNECs that are highly loaded in zero balance model.

Have you been affected by unilateral capacity reductions, such as allocation constraints or individual validation adjustments?

- Yes
- No
- Not applicable

Please clarify your answer - in particular, the extent to which you were affected.

As a TSO of Slovakia we are affected by Polish allocation constraint and also by individual validation adjustments of neighbouring Core TSOs, but overall impact for reaching the 70% target is not that high.

Do you believe that enough transparency and justification is provided by TSOs in the application of validation adjustments, or other similar unilateral reductions of cross-zonal capacities?

- Yes
- No

Please clarify your answer.

Do you consider that ACER's current MACZT monitoring exercise on regions that apply a CNTC capacity calculation methodology provides a complete assessment?

- Yes
- No

Please clarify your answer, and potential suggestions to improve this monitoring.

N/A - SEPS is a part of FB CC CCR Core

Unnecessary constrained capacities limit EU welfare

Do you believe that additional cross-border transmission capacity would have played a critical role in coping with the effects of the energy crisis of 2022?

- Yes
- No

Please clarify your answer.

Do you see a risk for re-dispatching costs to offset the potential gains from increased cross- border transmission capacity and further market integration?

- Yes
- No

Please clarify your answer.

Costly remedial actions should be primarily activated to maintain operational security of pan European transmission system.

Activations of costly remedial actions to increase cross-border transmission capacity purely to fulfill 70 % MACZT obligation could indeed offset the potential gains due to high costs that will need to be payed by activating TSOs.

Conclusions

Any other comment

We would strongly propose to consider reassessment of the proposed approach to fulfill 70 % MACZT target by TSOs as it is currently set by ACER and EU legislation. The 70 % target can be reached if MACZT evaluation would consider grid specifics and would not endanger operational security of some TSOs. Activations of costly remedial actions should be focused mainly to ensure system security.

Contact

[Contact Form](#)