

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?*

Our position is that the definition of the CCRs should include merging of the proposed CWE and CEE regions. We believe that only this solution can ensure that the regions will develop and implement a common congestion management procedure compliant with the requirements of the CACM Regulation.

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?*

The proposed evolution of the CCRs over time should in the first step be modified in accordance with our answer to the first question. As regards the future merger of "CWE+CEE" region with Italy North we believe that any further development towards implementing flow based approach should wait until Switzerland joins the single day-ahead market coupling. We therefore support one of the proposed options, i.e. that the TSOs agree to extend the deadline for submission of the proposal for a common coordinated flow based capacity calculation methodology to up to 6 month after joining of Switzerland.

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?*

Our position is that the merged "CWE+CEE" region should include the bidding zone borders between Croatia and Slovenia, between Croatia and Hungary, and between Romania and Hungary.

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

Having in mind the provisions of the Regulation (EC) No 714/2009 and all other European electricity market legislation, as well as the problems some neighbouring TSOs are facing due to inexistence of a bidding zone border between Germany/Luxembourg and Austria, we believe that this border should be included in the merged "CWE+CEE" region.

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?*

No.