15 March 2018

Subject: Proposal for capacity calculation methodology, in accordance with Article 20(2) and 21 of Regulation 2015/1222 – joint request of a 4-month extension pursuant to Article 8(1) of Regulation 713/2009

Dear Alberto,

I write on behalf of all Regulatory Authorities in CCR Hansa with regard to the all CCR Hansa Transmission System Operators’ ("TSOs") proposal for the capacity calculation methodology (hereinafter referred to as "CCM proposal") submitted in accordance with Article 20(2) of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management (hereinafter referred to as "CACM Regulation").

The CCR Hansa TSOs submitted the CCM proposal in accordance with Article 9(7), letter a) of CACM Regulation to the last concerned NRA on 19 September 2017.

The CCM proposal is made on the basis that advanced hybrid coupling ("AHC") will be applied between CCR Hansa and CCR Nordic and CCR Core. Very late in the process it has become clear to all Regulatory Authorities in CCR Hansa, that the current level of coordination between CCR Hansa and CCR Core is insufficient to carry this. Hansa TSOs want AHC from go-live, while Core TSOs have chosen not to prioritize this. All Regulatory Authorities in CCR Hansa find that AHC would have to be included in all three CCRs’ methodologies in order to be legally sound.

All regulatory authorities in CCR Hansa agree that AHC should be the target for CCR Hansa towards both CCR Nordic and CCR Core. Towards Nordic CCR the TSOs in both CCR Hansa and CCR Nordic have also agreed to coordinate AHC.

Several new issues have arisen, which were not relevant to discuss earlier in the process, as AHC solves these. All Regulatory Authorities in CCR Hansa therefore do not have a common agreement on how to provide guidance to the TSOs on these issues.

For the above reasons, all Regulatory Authorities in CCR Hansa deem it important to obtain more information about whether there are any real obstacles for coordinating AHC between CCR Core and CCR Hansa in order to include AHC in both regions’ methodologies, before all Regulatory authorities in CCR Hansa issue a decision about the CCM proposal.

As a consequence, the Regulatory Authorities of CCR Hansa are not able to adopt a decision by 19 March 2018 and, therefore, unanimously agree to jointly request the Agency to grant a 4-month extension according to Article 8(1) of Regulation (EC) 713/2009 of the European Parliament and of the Council of 13 July 2009 establishing an Agency for the Cooperation of Energy Regulators.
All NRAs in CCR Hansa are confident that within 4 months following the extension if agreed by ACER, they will reach a unanimous agreement on which amendments to request to the CCM proposal.

On behalf of all Hansa Regulatory Authorities

Yours sincerely,

Finn Dehlbæk
Director General
Danish Energy Regulatory Authority