



Mr. Alberto Pototschnig
Director
ACER

Cc: Mr. Gheorghe Visan
Chairman
Core Steering Group

Cc: Mr. Klaus-Dieter Borchardt,
Director IEM
DG ENER, European Commission

3 July 2019,

Subject: Proposals for the coordination and the cost sharing of redispatching and countertrading in accordance with Article 35 and Article 74 of Commission Regulation (EU) 2015/1222 of 24 July 2015 – Request for Extension pursuant to Article 8 of Regulation (EC) n° 713/2009 of 13 July 2009

Dear Alberto,

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).

According to Articles 35(1) and 74(1) of the CACM Regulation, Core TSOs were expected to submit RDCT proposals within 16 months after the regulatory approval on capacity calculation regions referred to in Article 15 of the CACM Regulation. Core TSOs informed Core NRAs by a letter on the 22nd of February 2018 of the unfeasibility for them to meet this deadline. The European Commission was informed of this situation and established a new timeline with the TSOs, requesting a submission of a first draft of the RDCT proposals by March 2019 and the setup of an experimentation intended to provide rationales for establishing the final RDCT proposals by the end of the third trimester of 2020.

The last Core NRA received these first draft proposals on the 27th of March 2019. The legal deadline to reach an agreement on these proposals is therefore the 27th of September 2019.

Such draft proposals however are largely incomplete as Core TSOs expected the experimentation to provide solid ground to build the final RDCT proposals. Consequently, the draft proposals are not sufficiently developed to be implemented as such and cannot be approved by Core NRAs in their

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



current form. At the same time, Core NRAs consider that it is not preferable to try to bring any change to these proposals in the absence of the experimentation.

Therefore, all Core NRAs unanimously request the Agency to extend the initial period to assess the proposal by another period of six months (postponing the deadline to reach an agreement to 27th of March 2020) - according to Article 8(1) of Regulation (EC) n° 713/2009 of the European Parliament and of the Council of 13 July 2009 establishing an Agency for the Cooperation of Energy Regulators - to accommodate the time necessary for TSOs to start conducting the experimentation and submit an updated version of their proposals.

Yours sincerely,

Mathieu Fransen,
Chair of the Core Energy Regulators' Regional Forum