

REQUEST FOR AMENDMENT BY ALL HANSA NRAS ON THE PROPOSAL OF ALL TSOS OF THE HANSA CAPACITY CALCULATION REGION FOR THE COORDINATED REDISPATCHING AND COUNTERTRADING COST SHARING METHODOLOGY IN ACCORDANCE WITH ARTICLE 74 OF THE COMMISSION REGULATION (EU) 2015/1222 OF 24 JULY 2015 ESTABLISHING A GUIDELINE ON CAPACITY ALLOCATION AND CONGESTION MANAGEMENT

02 October 2018

1 INTRODUCTION

On 16 March 2018, the Transmission System Operators within the capacity calculation region Hansa: TenneT, Svenska Kraftnät, PSE, 50 Hertz, and Energinet (“Hansa TSOs”) and also Statnett, issued a proposal for the Coordinated Redispatching and Countertrading Cost Sharing Methodology for the Hansa region in accordance with Article 74 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management (“Regulation 2015/1222”), hereinafter “the proposal”.

The Hansa NRAs, ie Bundesnetzagentur, Energimarknadsinspektionen, Urząd Regulacji Energetyki, and Forsyningstilsynet, and also Autoriteit Consument & Markt and Norges vassdrags- og energidirektorat have in cooperation analysed the proposal and come to a common conclusion that the proposal needs to be amended before it can be approved on national level by each NRA. Therefore, according to Article 9 (12) of Regulation 2015/1222 the Hansa NRAs request the Hansa TSOs to submit an amended proposal that considers the comments presented in this document.

2 Comments on the draft proposal

General remarks:

1. The method should be possible to read independently. References are now made to direct paragraphs in another method (CRC Methodology). Therefore, in order to get a closer understanding of the method proposal, the reader must also go to the second method. However, references to other not yet approved proposals are legally not possible. We prefer references to the article itself or if applicable to approved proposals.

Specific remarks:

2. Whereas (4): Reference to article 74 (4) (i) is not correct, we suppose it should be article 74 (6) (i).
3. Whereas (6): Reference to other non-approved methodologies is not advisable. Also the paragraph is not exactly the same as the preamble section under the proposal under Regulation 2015/1222 art. 35.
4. Whereas (8): This whereas describes fundamental parts of the proposal which are also partly mentioned in the main part. Please ensure that the fundamentals are included in the main part and try to avoid repetitions.
5. Article 2 (2) (a) (ii): Please explain how cost sharing would work in practice with examples in the explanatory document, including all costs types from art. 2 (2) (a) (i-v). We would ask that the examples are chosen so that they are representative and cover redispatch and countertrade methods from all CCR Hansa TSOs' control areas. NRAs have concerns about approving all five cost types without understanding their applicability. CACM GL art. 74(4) states "*determine which costs incurred from using remedial actions*". Please elaborate in the explanatory document how "availability payments" fit here, as the costs of availability payments incur also when the remedial actions are not used.
6. Article 3 (4): Please explain what "*benefits*" are and how they can be "*fairly distributed*". Please consider adding "*benefits*" to the definitions.
7. Article 4 (1): The reference to "Article 4 (2) of the RD and CT measures" might be misleading. Please make a clear reference to the methodology in question.