
**Explanatory Document to the Hansa CCR
TSOs' methodology for a market-based
allocation process of cross zonal capacity
for the exchange of balancing capacity or
sharing of reserves in accordance with
Article 41 of Commission Regulation (EU)
2017/2195 of 23 November 2017
establishing a guideline**

13 October 2020

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Definitions and Abbreviations

Definitions

- 'Cross zonal capacity allocation optimisation function'** means the algorithm applied for the allocation of CZC to the balancing capacity market within a balancing capacity cooperation in which balancing capacity is exchanged with the objective function to maximize the sum of welfare of the balancing capacity market and the SDAC market.
- 'Contracting of balancing capacity'** means a process at a certain point in time where balancing service providers' bids in a balancing capacity auction are selected after the gate closure time and the balancing service providers are informed about their selected bids.
- 'Procurement of balancing capacity'** means a range of processes during a certain time period and ranges from creating a balancing capacity auction until the selection of balancing capacity bids at the gate closure time (the Contracting of balancing capacity), and informing the balancing service providers about their selected bids.
- 'Balancing market time unit'** means the longer of the imbalance settlement periods within a single balancing capacity cooperation, except for where at least one of the two imbalance settlement periods are longer than 15 minutes, in which case the balancing market time unit means 15 minutes, starting right after 00:00 CET. The balancing market time units shall be consecutive and not overlapping.
- 'Duration of application'** means the contracting period where CZC is allocated that has been made by a TSO for exchange of balancing capacity or sharing of reserves. It is related to the duration of the reserve, and sometimes dependant on energy product.
- 'Use of cross zonal capacity for the exchange of balancing capacity or sharing of reserves'** means allocated CZC used for the exchange of balancing capacity or sharing of reserves, either for exchange of balancing capacity in terms of dimensioning/compliance or for physical use of CZC for actual transfer of balancing energy.
- 'Release of cross zonal capacity for the exchange of balancing capacity or sharing of reserves'** means CZC allocated for the exchange of balancing capacity or sharing of

reserves that is no longer needed, shall be released as soon as possible and returned in the subsequent capacity allocation timeframes. CZC allocated for the exchange of balancing capacity or sharing of reserves that has not used for the associated exchange of balancing energy, shall be released for the exchange of balancing energy with shorter activation times or for operating **the** imbalance netting process.

'Market value of cross zonal capacity for the exchange of energy' means the change in the economic surplus of the bidding zone (the sum of the producer surplus, consumer surplus and congestion income) resulting from the incremental change of the CZC allocated for the exchange of energy.

'Market value of CZC for the exchange of balancing capacity or sharing of reserves' means the change in the economic surplus of the balancing capacity market (the sum of buyer surplus, seller surplus and congestion income) resulting from the incremental change of the CZC allocated for the exchange of balancing capacity or sharing of reserves.

Abbreviations

The list of abbreviations used in this document:

| | |
|----------------|--|
| AC | alternating current |
| aFRR | frequency restoration reserves with automatic activation |
| ATC | Available Transfer Capacity |
| BC | balancing capacity |
| BRP | balancing responsible party |
| BSP | balancing service provider |
| BTU | balancing market time unit |
| CACM | Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management |
| CZC | cross zonal capacity |
| CZCA | cross zonal capacity allocation |
| D | day |
| DAM | day-ahead market |
| DC | direct current |
| EBGL | electricity balancing guide line |
| ENTSO-E | European Network of Transmission System Operators for Electricity |
| EU | European Union |
| FCR | frequency containment reserves |
| FRR | frequency restoration reserves |
| LFC | load-frequency control |
| LFCR | load-frequency control and reserves |
| mFRR | frequency restoration reserves with manual activation |

1 Introduction

The Commission Regulation (EU) 2017/2015 establishing a guideline on electricity balancing (hereafter referred to as the 'EBGL') proposes the application of cross-zonal capacity allocation (hereafter referred to as 'CZCA') for the balancing process to improve competition by means of cross zonal balancing exchanges. This implies that TSOs may allocate cross-zonal capacity (hereafter referred to as 'CZC') available from the single day-ahead coupling (hereafter referred to as 'SDAC'). To yield the largest benefit through a CZCA in a market-based environment, the EBGL introduces three capacity allocation methods:

- Article 40 - Co-optimised allocation process
- Article 41 - Market-based allocation process
- Article 42 - Allocation process based on economic efficiency analysis

This document gives background information and rationale for the CCR Hansa proposal for a **methodology for a market-based allocation process of cross zonal capacity** (hereafter referred to as 'MB CZCA') for the exchange of balancing capacity or sharing of reserves, being developed in accordance with Article 41 of the EBGL.

The aim of this explanatory document is to provide additional information with regard to the MB CZCA for the exchange of balancing capacity and sharing of reserves.

For higher legibility the document is structured as follows:

- **Chapter 1** and **2** give a general presentation of the EBGL requirement and the market-based allocation process methodology;
- **Chapter 3** provides background information regarding day-ahead and intraday market coupling, and balancing capacity markets;
- **Chapter 4** covers the assessment of the market value of CZC. The principles of the required CZCA optimisation (cost benefit analysis) are provided;
- **Chapter 5** introduces a comprehensive description of the market-based allocation process. The mathematical description and firmness regimes are emphasized;
- **Chapter 6** is dedicated to the public consultation about this MB CZCA methodology.

1.1 EBGL and the scope of the CZCA Proposal

The EBGL established an EU-wide set of technical, operational and market rules to govern the functioning of electricity balancing markets.

The main purpose of this guideline is the integration of balancing markets to enhance the efficiency of the European balancing processes. The integration should be done in a way that avoids undue market distortion. In other words, it is important to focus on establishing a level playing field. This requires a certain level of harmonisation in both technical requirements and market rules. To provide this level of harmonisation,

the EBGL sets out certain requirements for the developments of harmonised methodologies for the allocation of cross zonal capacity for balancing purposes.

1.2 TSOs may allocate cross zonal capacity

TSOs procure ahead of real-time balancing capacity from frequency restoration reserves (FRR) and/or replacement reserves (RR). These reserves are the system's insurance to make sure that in real-time TSOs can activate at least a minimum amount of balancing energy bids to cope with imbalances in the system.

Cross border cooperation for the procurement of balancing capacity for FRR and/or RR could be implemented by two different schemes:

- **Exchange of balancing capacity** which refers to the provision of balancing capacity to a TSO in a different scheduling area than the one in which the procured balancing service provider is connected. Exchange of balancing capacity between balancing areas may lead to a geographical location of the balancing capacity that differs from the dimensioning results for each area.
- **Sharing of reserves** which refers to a mechanism in which more than one TSO takes the same reserve capacity, being FRR or RR, into account to fulfil their respective reserve requirements resulting from their reserve dimensioning processes. Since TSOs most often do not use their maximum procured capacity simultaneously, TSOs can share some of their reserves, and thereby reduce the total amount of procured balancing capacity within the two areas and save procurement costs.

Article 38 of the EBGL allows two or more TSOs to allocate a part of the CZC for the cross zonal exchange of balancing capacity or sharing of reserves. Such an allocation can:

- enable TSOs to procure balancing capacity in an efficient and market-based manner;
- improve competition and liquidity for balancing capacity markets;
- improve competition between different markets;
- facilitate regional procurement of balancing capacity

To yield the largest benefit through a CZCA in a market-based environment, the EBGL introduces three capacity allocation methods:

- Co-optimised allocation process, pursuant to Article 40;
- Market-based allocation process, pursuant to Article 41;
- Allocation process based on economic efficiency analysis, pursuant to Article 42

All TSOs shall provide a common proposal for an allocation method based on co-optimisation (Art. 40) and each CCR may provide a common proposal for a) market-based allocation (Art. 41) and b) allocation based on economic efficiency analysis (Art. 42).

This explanatory document focuses exclusively on the market-based method.

1.3 Optimised allocation of cross zonal capacity between day-ahead and balancing capacity market

CZC between two bidding zones can be allocated to different time frames and is thus a scarce resource which has to be allocated in an economically efficient way. The CZC allocated to the SDAC decreases the available CZC for the balancing capacity (BC) and vice versa. In other words, allocation of CZC to one market increases the welfare resulting from that market but decreases the welfare resulting from the other and vice versa.

The market based allocation process implies allocation of CZCA for the balancing capacity market between W-1 and D-1 for the 24 hours of day D together with the contracting of balancing capacity.

Day-ahead energy supply and demand bids, together with balancing capacity bids, therefore compete for the available CZC for day D.

The classic economic approach to (Pareto) optimally allocating CZC to different purposes (also called the optimal capacity split problem) is to set the capacity split such that the marginal value for each purpose is equal (or the difference in marginal value is minimal if the lines do not cross). This principle is shown in Figure 1 below. Given the scope of the MB CZCA, this capacity split achieves the maximum overall welfare.

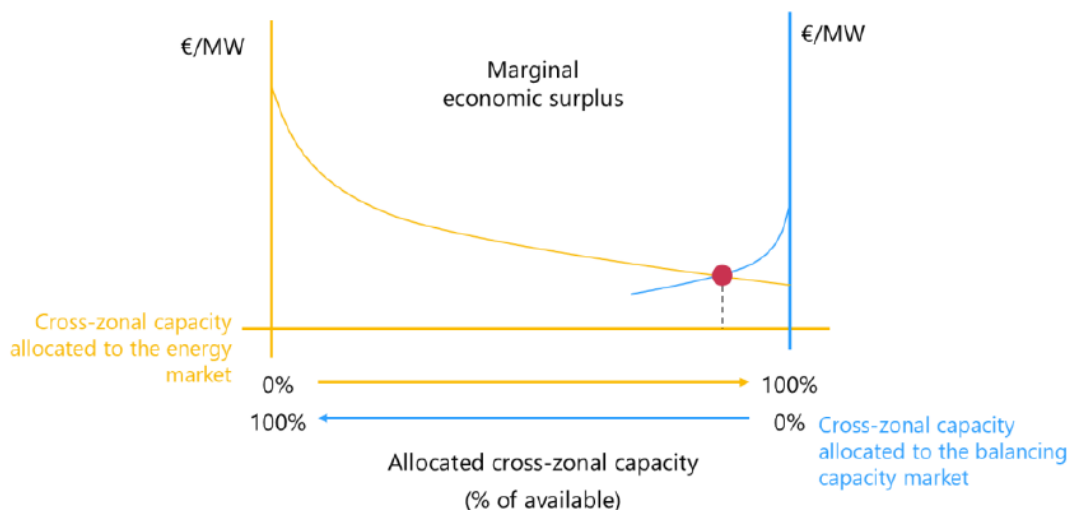


Figure 1: Principle of optimal capacity allocation to different purposes

The objective of the procurement optimisation function is to maximise the sum of welfare of the balancing capacity market and the SDAC.

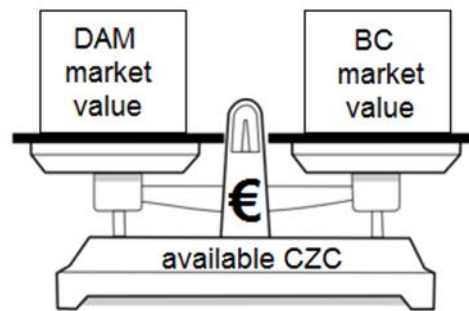


Figure 2: How to allocate available cross zonal capacity

As a result, CZC may incrementally be allocated for the exchange of balancing capacity or sharing of reserves as long as the incremental market value for the exchange of balancing capacity exceeds the incremental market value for the SDAC.

2 EBGL requirements for market-based allocation process methodology

Article 41 of the EBGL enables all Hansa TSOs to develop a proposal for a methodology for a market-based allocation process of CZC for the exchange of balancing capacity or sharing of reserves. This section provides a summary of the EBGL requirements for the MB CZCA.

2.1 Market-based proposal: Article 41 of the EBGL

Article 41(1) of the EBGL states the requirements to develop “a methodology for a market-based allocation process of cross-zonal capacity for the exchange of balancing capacity or sharing of reserves.”

Besides the obligation to develop a proposal, Article 41 of the EBGL defines boundary conditions and specific requirements for this methodology.

In the words of the EBGL, such a methodology shall:

- a) *apply for the exchange of balancing capacity or sharing of reserves with a contracting period of not more than one day and where the contracting is done not more than one week in advance of the provision of the balancing capacity;*
- b) *include the notification process for the use of the market-based allocation process;*
- c) *include a detailed description of how to determine the actual market value of cross-zonal capacity for the exchange of balancing capacity or sharing of reserves, and the forecasted market value of cross-zonal capacity for exchanges of energy and the forecasted market value of cross-zonal capacity for the exchange of balancing capacity or sharing of reserves;*
- d) *include a detailed description of the pricing method, the firmness regime and the sharing of congestion income for the cross-zonal capacity that has been allocated to bids for the exchange of balancing capacity or sharing of reserves via the market-based allocation process;*

Pricing methods are, for example, pay-as-bid and pay-as-cleared. It is required to describe in detail when the CZC is considered to be firmly allocated to the matched bids for the exchange of balancing capacity or sharing of reserves, in other words, to identify the time interval during which this CZC is not available for any other allocation processes.

In general, the congestion income is part of the total economic welfare and its value can be change due to allocation of CZC for the exchange of balancing capacity or sharing of reserves. It appears whenever there is a price difference between bidding zones and it can also take into account the cost of using CZC (in case a third party owns transmission rights). The congestion income on a border, if any, must be shared between the TSOs who share that border: it is required that the MB CZCA Proposal contains the principles for sharing the congestion income.

Article 41(4) of the EBGL requires that the definitions of the pricing method of CZC, the firmness regime of CZC, and the sharing of congestion income from CZC for which the MB CZCA Proposal is applied ensure equal treatment between balancing capacity bids and energy bids.

(e) include the process to define the maximum volume of allocated cross-zonal capacity for the exchange of balancing capacity or sharing of reserves pursuant to paragraph 2;

Article 41 poses no a priori limitation for the market-based allocation of CZC for exchange of balancing capacity or sharing of reserves, but limits can arise from technical or economic reasons.

(f) be based on a comparison of the actual market value of cross-zonal capacity for the exchange of balancing capacity or sharing of reserves and the forecasted market value of cross-zonal capacity for the exchange of energy;

Moreover, it is stated in Article 41(5) of the EBGL that CZC allocated for the exchange of balancing capacity or sharing of reserves via the market-based allocation process shall be used exclusively for the exchange of balancing capacity or sharing of reserves and the associated exchange of balancing energy, otherwise it shall be released.

2.2 Principles from Articles 38 and 39 of the EBGL

Article 38 of the EBGL – General requirements

The methodology for the MB CZCA is based on general requirements set out in Article 38 of the EBGL.

Article 38(1) of the EBGL states that two or more TSOs are allowed to allocate parts of CZC for the use of balancing, based on three different allocation methodologies, market-based being one of them. Any contract between two or more TSOs for CZCA for the exchange of balancing capacity or sharing of reserves already in place before the EBGL entered into force may remain valid until the contract expires.

Article 38(2) of the EBGL lists information that any CZCA proposal needs to specify regarding its scope of application: bidding zone borders, market timeframe, duration, and methodology.

Article 38(3) of the EBGL stipulates that, where relevant, all TSOs shall develop a proposal to harmonise the different proposals for each of the three allocation methodologies by 5 years after the EBGL entered into force.

Article 38(4) of the EBGL mentions that CZC which is allocated to the exchange of balancing capacity or sharing of reserves can only be used for the standard products of mFRR, aFRR and RR for both AC and DC interconnections. On DC interconnectors, CZC may also be allocated for operating and exchanging FCR. The reliability margin of AC interconnectors shall be used for operating and exchanging FCR and shall not be used for the exchange of balancing capacity or sharing of reserves.

Article 38(5) of the EBGL forbids the CZCA for balancing purposes when capacity calculation is not performed according to capacity calculation methodologies developed pursuant to Commission Regulation (EU) 2015/1222 and pursuant to

Commission Regulation (EU) 2016/1719. However, the TSOs believe this requirement shall not prevent TSOs to establish early market based integrated balancing capacity markets and applying allocation of cross-zonal capacity.

Article 38(8) of the EBGL requires that:

- on a regular basis it is assessed whether the allocated CZC is needed for the purpose of balancing;
- when CZC is no longer needed for the purpose of balancing, it shall be released as soon as possible and returned in the subsequent capacity allocation timeframes, where it shall no longer appear as already allocated CZC in the calculations of CZC.

According to Article 38(9) of the EBGL, allocated CZC shall be released when it has not been used for the associated exchange of balancing energy, meaning that the RR, mFRR and aFRR quantities affecting CZC have not been activated in their relevant timeframes. Releasing CZC means that it becomes available for the exchange of balancing energy with shorter activation times (e.g. allocated CZC for aFRR, when released, is available for imbalance netting).

Article 39 of the EBGL – Calculation of the market value of cross zonal capacity

Article 39 of the EBGL defines the principles for the calculation of the market value of CZC. The relevant parts for the MB CZCA methodology are described in the following and in more detail in Section 4.

Article 39(1) of the EBGL states that for MB CZCA the market value of CZC is determined based on actual or forecasted market values of CZC.

Article 39(3) of the EBGL says that the actual market value of CZC for the exchange of balancing capacity shall be calculated based on balancing capacity bids submitted to the capacity procurement optimisation function.

Article 39(4) of the EBGL says that the actual market value of CZC for sharing of reserves shall be calculated based on the avoided costs of procuring balancing capacity.

2.3 Other relevant information from the EBGL

Article 33 of the EBGL – Exchange of balancing capacity

According to Article 33(2) of the EBGL, *"except in cases where the TSO-BSP model is applied pursuant to Article 35, the exchange of balancing capacity shall always be performed based on a TSO-TSO model whereby two or more TSOs establish a method for the common procurement of balancing capacity taking into account the available cross-zonal capacity and the operational limits defined in Chapters 1 and 2 of Part IV Title VIII of Regulation (EU) 2017/1485."*

Article 33(3) of the EBGL states that, apart from the exceptions in Articles 26 and 27 of the EBGL, *"all TSOs exchanging balancing capacity shall submit all balancing capacity bids from standard products to the capacity procurement optimisation function"*, without modifying or withholding any balancing capacity bids which shall be included in the procurement process.

Article 33(4) of the EBGL requires that all TSOs exchanging balancing capacity ensure the (secure) availability of CZC, either by a probabilistic approach (described in Article 33(6) of the EBGL) or by the CZCA methodologies pursuant to Articles 38 to 42 of the EBGL.

Article 36 of the EBGL – Use of cross zonal capacity

According to Article 36(2) of the EBGL, *"two or more TSOs exchanging balancing capacity may use cross-zonal capacity for the exchange of balancing energy when cross-zonal capacity is:*

a) available pursuant to Article 33(6);

i.e. it is calculated with the probabilistic approach,

b) released pursuant to paragraphs 8 and 9 of Article 38;

meaning that CZC was allocated according to one of the methodologies in Articles 40, 41 and 42 of the EBGL and then either not used for the associated exchange of balancing energy or deemed too high in a re-evaluation,

c) allocated pursuant to Articles 40, 41 and 42.

meaning that CZC was allocated according to one of the methodologies in Articles 40, 41 and 42 of the EBGL and can therefore be used for the associated exchange of balancing energy.

3 Balancing capacity market

According to Article 32 of the EBGL, all TSOs of an LFC block shall regularly and at least once a year review and define the reserve capacity requirements for the LFC block or scheduling areas of the LFC block pursuant to dimensioning rules given by SOGL. Reserve capacity can be provided by:

- a) procurement of balancing capacity within control area and exchange of balancing capacity with neighbouring TSOs;
- b) sharing of reserves;
- c) the volume of non-contracted balancing energy bids which are expected to be available both within their control area and within the European platforms taking into account the available CZC

3.1 Balancing capacity auctioning

Each TSO procuring balancing capacity shall define the rules for the procurement of balancing capacity. The rules for the procurement of balancing capacity shall comply with the following principles, according to the Article 32(2) of the EBGL:

- a) the procurement method shall be market-based for at least the frequency restoration reserves and the replacement reserves;
- b) the procurement process shall be performed on a short-term basis to the extent possible and where economically efficient;
- c) the contracted volume of balancing capacity may be divided into several contracting periods.
- d) the procurement of upward and downward balancing capacity for at least the frequency restoration reserves and the replacement reserves shall be carried out separately.

3.2 Exchange of balancing capacity

The exchange of balancing capacity allows TSOs to rely on BSPs that are connected to an area operated by a different TSO.

Two or more TSOs may develop a proposal for the establishment of common and harmonised rules and processes for the exchange and procurement of balancing capacity while respecting the requirements set by EBGL for procurement for balancing capacity.

Except in cases where the TSO-BSP model is applied, the exchange of balancing capacity shall always be performed based on a TSO-TSO model whereby two or more TSOs establish a method for the common procurement of balancing capacity taking into account the available CZC and the operational limits defined by SOGL.

All TSOs participating in the same exchange of FCR, FRR or RR shall specify an exchange agreement as defined by SOGL.

Exchange of balancing capacity may lead to a geographical location of the balancing capacity that differs from the dimensioning results for each area, however, the total amount of balancing capacity within the two areas is still equivalent to the total amount without the exchange of balancing capacity.

Figure 3 illustrates the exchange of 200 MW of balancing capacity from Area B to Area A.

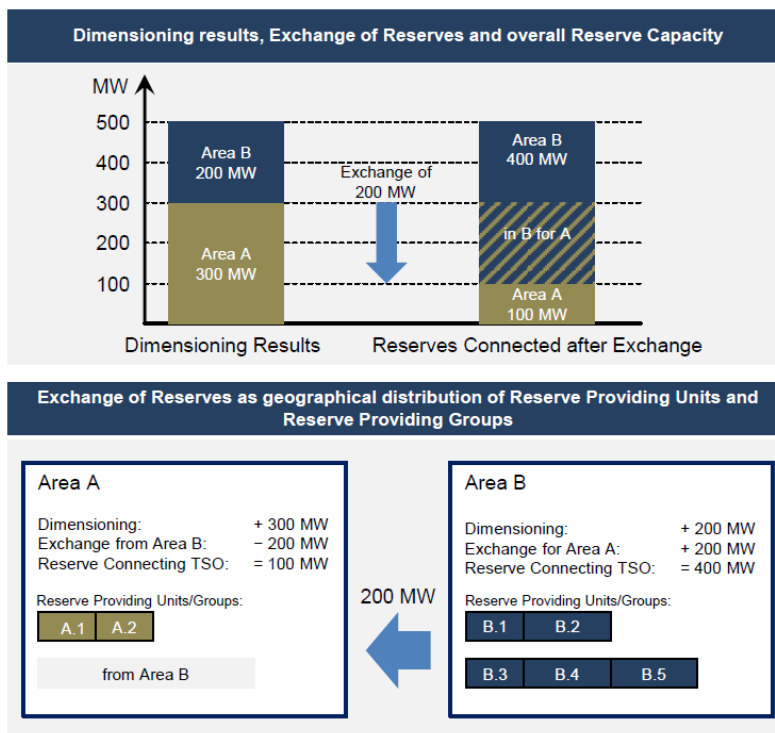


Figure 3: Illustrative example Exchange of balancing capacity, source: LFCR supporting document 2013

Suppose that the dimensioning rules result in the need of 300 MW for Area A and 200 MW for Area B. Without the exchange of balancing capacity, the respective reserve capacity has to be provided by reserve providing units or reserve providing groups connected to the Area which means that 300 MW have to be connected in Area A and 200 MW in Area B.

As a result of the exchange of balancing capacity of 200 MW from Area B to Area A, 200 MW of reserve capacity needed for Area A will now be located within Area B, whereas Area A still ensures the availability of the full amount of its own reserve capacity.

Although the geographical location of the reserve capacity is different from the dimensioning results for each area, the total amount of reserve capacity within Area A and B is still 500 MW which is equivalent to the total amount without the exchange.

3.3 Sharing of reserves

A sharing of reserves agreement allows two or more TSOs to rely on the same reserves.

The roles and responsibilities of the reserve connecting TSO, the reserve receiving TSO and the affected TSO for the exchange of balancing capacity between synchronous areas, shall be described in the synchronous area operational agreement and a sharing agreement as defined by SOGL.

In contrast to the exchange of balancing capacity, that only changes the geographical distribution of reserve capacity, the sharing of reserves changes the total amount of procured balancing capacity by involved TSOs, with an impact on the geographical distribution as an additional implicit effect. A sharing of reserves agreement defines priority rights to the shared reserves in the situation where either two or more TSOs have a simultaneous need.

Figure 4 illustrates the sharing of 100 MW of balancing capacity between two areas with a possible relocation of a 100 MW of balancing capacity from Area A to Area B.

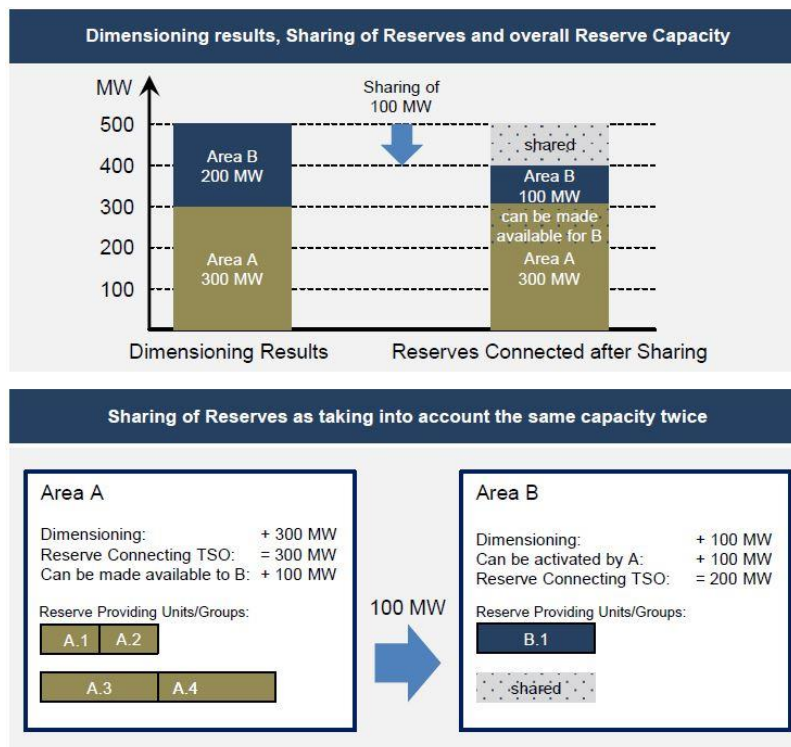


Figure 4: Sharing of Reserves – simple example. Source: LFCR supporting document 2013

Suppose that the dimensioning rules for area A and area B result in the need of 300 MW for area A and 200 MW for area B. Without the sharing of reserves, the TSO of area A and area B have to ensure the availability of respectively 300 MW and 200 MW.

However, assuming that is very unlikely that both TSOs need to activate the full amount of reserve capacity at the same time, the TSO of area A and area B can 'share' a part of their reserve capacity. In practice this means that the TSO of area B can make use of e.g. 100 MW of the reserve capacity of the TSO in area A.

As a result, the TSOs of area A and area B now need to ensure the availability of 300 MW and 100 MW. The TSO of area A now makes 100 MW of his own reserve capacity available to the TSO of area B. The total amount of the reserve capacity within the system is now 400 MW, whereas it was 500 MW without the sharing agreement (leading in this example to reduction of 100 MW of reserve capacity in the total system).

4 Market value of cross zonal capacity

The decision within the MB CZCA to optimally allocate CZC to either the day-ahead energy market or the balancing capacity market shall be based on a comparison of the actual market value of cross-zonal capacity for the exchange of balancing capacity or sharing of reserves and the forecasted market value of cross-zonal capacity for the exchange of energy, according to Article 41(3) of the EBGL.

Article 39 (3-4) of the EBGL further specifies how the actual market value shall be derived: balancing capacity bids submitted to the capacity procurement function pursuant to Article 33 (3) of the EBGL shall be used. When CZC is used for the sharing of reserves, the market value shall be based on the avoided costs of procuring balancing capacity in order to calculate the buyer surplus for the balancing capacity market. The forecasted market value of CZC for the exchange of energy between bidding zones and for the exchange of balancing capacity are calculated per MTU.

4.1 Forecasted Market Value of cross zonal capacity for the Exchange of Energy

4.1.1 The market value of cross zonal capacity

In the MB CZCA Proposal as well as in this Explanatory Document, the forecasted market value of CZC for the day-ahead exchange of energy between bidding zones is defined as the welfare increase expected from the SDAC resulting from an incremental increase in CZC allocated to the energy market.

The market value is calculated based on price differences (market spread) to calculate the sum of producer surplus, consumer surplus and congestion income.



Figure 5: Market value of CZC is defined as the total welfare surplus

Note that:

- the important measure for the market value is the surplus in welfare of additional CZC, not the absolute values of welfare.
- only the implicit allocation of CZC (flow-based or ATC-based) is relevant for the calculation; any explicit allocation of CZC which may take place e.g. monthly or yearly only affects and determines the upper limit of CZC that may be used in the market-based allocation.

4.1.2 Isolated energy markets cleared independently

Figure 6 shows the base case of isolated energy markets which are cleared independently, i.e. no CZC is allocated or used for the exchange of energy and the market clearing prices (will) differ. In this example, the market clearing price in zone C is lower than in zone B. The consumer and producer surpluses are highlighted in blue and red, respectively, and the total sum of the areas represents the total welfare.

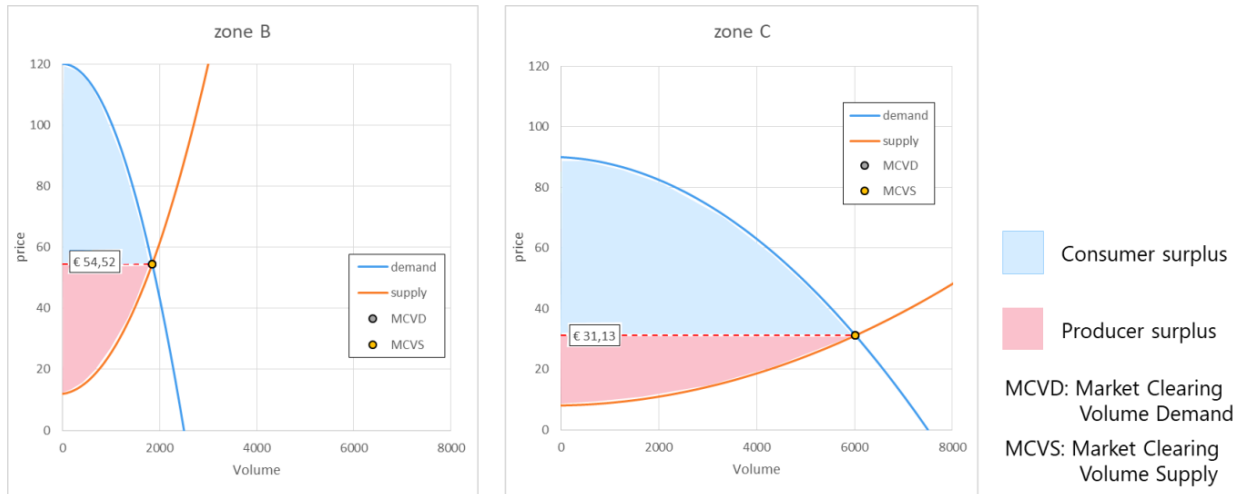


Figure 6: Welfare in two energy markets cleared in isolation

4.1.3 Coupled energy markets with congestion

When CZC is allocated for the exchange of energy, market participants may trade across the border. If the amount of available CZC is large enough, this may even lead to full price convergence between the two bidding zones. Once prices have converged, any additional CZC would then have a (market) value of 0. Figure 7 depicts a situation where the allocated CZC only allows for a partial price convergence: the market clearing price in zone C remains higher than in zone B. In addition to consumer and producer surpluses, the remaining price difference creates a positive congestion rent which is also part of total welfare (the green area between the red dotted lines in the zone B). With full price convergence, the congestion rent distributions would cancel out and disappear.

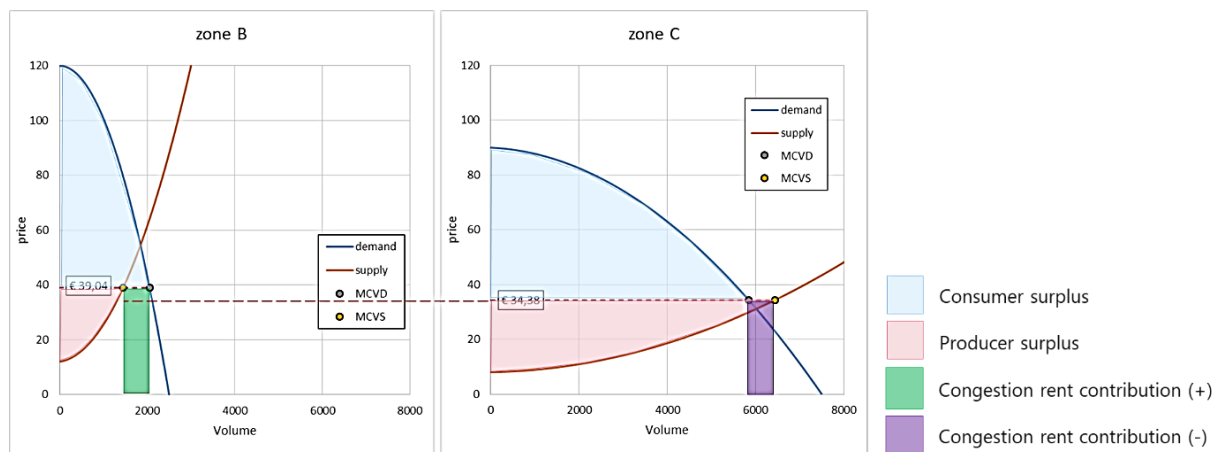


Figure 7: Welfare in coupled energy markets with congestion

The same logic may be applied to multiple markets and bidding zones; it is thus possible to calculate the value of CZC for each border for which the market-based allocation applies. The general calculation of welfare is shown in the equation below and consists of the sum of consumer surplus, producer surplus and congestion rent over all markets. The congestion rent for a market or bidding zone is calculated based on the market clearing price and the market net position, where the market net position equals the sum of exchanges in both directions (positive for export, negative for import) on all borders with other markets. The market net position also equals the difference in supply and demand volumes cleared.

$$\sum_{\text{all markets}} \{ \text{Consumer surplus} + \text{Producer surplus} - \text{Market Net Position} * \text{Market Clearing Price} \}$$

Equation 1: Calculation of the economic surplus when supply and demand are matched to an equilibrium clearing Point

The market value of CZC may now be calculated as the difference between total welfare when CZC is allocated for the exchange of energy and the situation of isolated markets. The optimal allocation of CZC using the market-based allocation method is determined by comparing the marginal market value of an additional MW of CZC for the exchange of energy and then compared to the marginal market value of the same additional MW of CZC for the exchange of balancing capacity for each border.

4.2 Actual Market Value of cross zonal capacity for the Exchange of Balancing Capacity or Sharing of Reserves

In the MB CZCA Proposal as well as in this Explanatory Document, the market value of CZC for the exchange of balancing capacity or sharing of reserves is defined as the additional total welfare surplus in the balancing capacity market resulting from the additional CZC allocated for the balancing capacity market, and is calculated based on (i) buyer surplus (TSO), (ii) seller surplus (balancing service provider) as well as on (iii) congestion income.

The underlying data are upward and downward balancing capacity bids which have been submitted by the balancing capacity procurement optimisation function

pursuant to Article 33(3) of the EBGL. In general, upward and downward balancing capacity bids are optimised independently, i.e. the demands etc. are not netted ex-ante. Note, that sharing of reserves is modelled as a reduction of consumer (TSO) demand by the shared amounts, before the markets are coupled. The additional market value of sharing of reserves is therefore based on the avoided costs of procuring according to Article 39(4) of the EBGL and assigned as the consumer surplus.

4.2.1 Non-convexities in balancing capacity markets

The balancing capacity market is directly linked to the energy market (day-ahead market), i.e. the BSPs' expectation of the market clearing in the day-ahead energy market will be reflected in their bidding behaviour for balancing capacity. The alternative costs for provision of reserves instead of day-ahead energy are lowest for the market participants that are almost indifferent to deliver energy, i.e. their marginal costs are near the spot price. For reserves to be offered, some market participants can lower their energy output, and others can start energy production at a moderate economic loss. The former has a variable cost and the latter have a fixed cost.

This dependency between the two markets makes it difficult to apply the market coupling principles as described above. For this to be true, there must be no externalities, and no transaction costs, and perfect information is assumed. Additionally, the welfare optimization problem must be convex. This includes the absence of discrete variables. Discrete variables mean combinatorial problems that are hard to solve. Balancing capacity bids that reflect fundamental costs cannot be organized as a monotonously increasing "merit order list".

Non-convexities include start-up and shut-down costs along with minimum output requirements (which state that if a plant is running, it must produce at least a certain amount). Due to this combinatorial problem, there does not exist a "market clearing price" in spinning reserve markets that clears a balancing capacity market efficiently, nor a "marginal price". The market price conveys little or no information on which reserve offers were accepted.

The non-convex effects in the balancing capacity market can be tackled through discrete variables (block bids and combinatorial constraints), and by maximising the welfare by using mixed integer programming. Efficiency of the allocation will be the highest if the procurement of balancing capacity and cross zonal capacity allocation market is integrated into one single auction, where the economic surplus is maximised subject to system constraints.

4 Market-based approach

4.1 Process overview

The market-based methodology consists of 4 steps: the forecast of market value of CZC for the exchange of energy, the bid submission of balancing capacity, the balancing capacity procurement and CZC allocation, and the publication of the results of the process.

4.1.1 Step 1: Forecast of market value of CZC for the exchange of energy

The forecasted market value of CZC for the exchange of energy shall be forecasted based on price differences (market spread) per border from SDAC for pre-selected reference day(s) with the option to include adjustment factors and mark-ups. The forecasting can have two steps:

- the basic forecast where the value of the used market indicator is determined, and
- the optional step of the improved forecast where the result of the basic forecast is modified with the use of the adjustment factor(s).

According to Article 41 of the EBGL, during the basic forecast process, the entity responsible for forecasting may take into account any market indicator (e.g. market clearing prices for each bidding zone) based on the submitted SDAC bids, or the submitted SDAC bids themselves. The TSOs of the balancing capacity cooperation shall define which market indicator(s) are used if deviating from default.

Reference day means in our example a day which is used to define the forecasted value of CZC. Reference day(s) shall be the latest relevant day(s), where the used market indicator(s) is (are) available for each bidding zone based on actual market outcome. (E.g. if the subject day is a bank holiday, TSOs may use the average value of a market indicator for the latest bank holiday and the latest weekend day.)

An adjustment factor means a correction of the forecasted market value of cross-zonal capacity for the exchange of energy, in order to improve forecasting during application in the balancing capacity procurement optimisation function based on the used reference day. In other words, the used market-spread of the reference day may be adjusted using an adjustment factor for the only purpose to increase the accuracy of the forecasting of the market value of cross-zonal capacity for the exchange of energy.

An adjustment factor can be any of the following:

- a fixed added value to the result of the basic forecast
- a fixed value by which the result of the basic forecast is multiplied
- parameters in a transparent methodology that uses the result of the basic forecast and other transparent data.

If the adjustment factors are used, they shall be used in a transparent way to incorporate improved forecasting and not to give preference to the exchange of

balancing capacity or sharing of reserves on the expense of CZC allocated to the exchange of energy.

The TSOs of the balancing capacity cooperation shall use a transparent methodology to forecast the market value of CZC for the exchange of energy (both the basic and the improved forecast need to be transparent).

In addition to the adjustment factor, a mark-up may be added to the forecasted market value of cross-zonal capacity for the exchange of energy.

A mark-up means an addition to the forecasted market value of cross-zonal capacity for the exchange of energy calculated in order to take into account the uncertainty in the forecasted market value of cross-zonal capacity for the exchange of energy during the allocation of cross-zonal capacity for the exchange of balancing capacity or sharing of reserves.

A mark-up always favours (increases) the market-value of cross-zonal capacity for the exchange of energy.

4.1.2 Step 2: Bid submission

BSPs submit standard upward and standard downward balancing capacity bids to their balancing capacity market operators.

The TSO-BSP GCT of standard balancing capacity bids shall be the same for each BSP within each balancing capacity cooperation (per standard product and per direction) and shall be organised in between week-ahead and before sending the final results of the capacity calculation for CZC of the SDAC to NEMOs.

For TSOs of a balancing capacity cooperation applying a central dispatching model the gate closure time for BSPs to submit the integrated scheduling process bids that are converted to the standard balancing capacity bids shall be defined in the national terms and conditions pursuant to Articles 24(5) and 24(6) of the EB Regulation.

TSOs of a balancing capacity cooperation have the option to allow BSPs to submit linked bids and/or block bids but the same rules have to apply to all BSPs within a balancing capacity cooperation.

In addition to the inputs of BSP bids and TSO demand of balancing capacity for the CZCA optimisation, also the standard limitations and further limitations on the maximum allocation of CZC for the exchange of balancing capacity or sharing of reserves are input of the optimisation. Reasoning for further limitations to reduce the allocation of CZC to balancing capacity are among others: SOGL limitations for minimum core part of local procurement, market abuse, protection of SDAC, scarce CZC due to maintenance or outage of network elements, and further limitations for possible step wise implementation of allocation of CZC to balancing capacity.

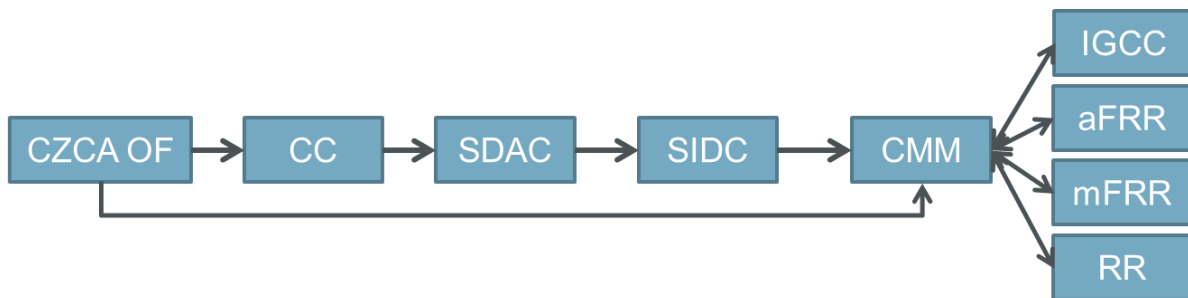
4.1.3 Step 3: Balancing capacity procurement optimization and CZCA optimisation

When optimising the balancing capacity procurement, the TSOs of each balancing capacity cooperation shall select the balancing capacity bids. This process shall

include the forecasted value of CZC for day-ahead exchange of energy as a cost associated with a balancing capacity bid requiring CZCA for exchange of balancing capacity or sharing of reserves.

CZC shall be allocated to the exchange of balancing capacity and sharing of reserves based on the accepted balancing capacity bids.

The information on the values of allocated CZC in [MW] per border, per product, per direction and per TSO are sent to the relevant CZC management functions that communicate with the balancing energy platforms. A simplified overview of the CZC communication directions for the process of market-based allocation including step 3 and step 4 is depicted in the figure below.



Legend: OF = optimisation function; CC = capacity calculation; CMM = capacity management module

The communication paths of the volume of CZC available for the market processes are as follows. The CZC optimisation function determines the amount of CZC available for balancing capacity, and communicates this with the capacity calculation process, such that the available CZC for SDAC is corrected and excludes allocated CZC to balancing capacity. Furthermore, the allocated CZC for balancing capacity is communicated with the capacity management module (CMM) supporting the balancing energy platforms. The remaining communication between SDAC and SIDC remains the same.

4.1.4 Step 4: Publication

TSOs shall inform all affected parties of the process results.

BSPs shall be notified about their selected standard upward balancing capacity bids or downward balancing capacity bids at the same point in time within each balancing capacity cooperation. The notification shall be done before subsequent TSO-BSP GCTs within the balancing capacity cooperation within CCR Hansa implementing this MB CZCA, and at the latest one hour before the GCT of the SDAC. Notification to all market participants of allocated CZC for the exchange of balancing capacity and/or sharing of reserves shall be done at the same point in time as the notification to BSPs mentioned above.

TSOs of the balancing capacity cooperation shall be responsible that the CZC calculation results for D-1 take into account the allocated volumes for the balancing capacity market, consequently not available for SDAC.

4.2 Description of Optimisation Setup

A minimum example for the conceptual description is the following:

- Objective: maximize total economic welfare of SDAC and balancing capacity cooperation
- Inputs:
 - (linked) Balancing capacity demand
 - (linked) Balancing capacity offers
 - Sharing of reserve volume
 - Forecasted market value for the exchange of energy (including adjustment factors and mark-ups)
 - CZC allocation limits
- Outputs:
 - Matched balancing capacity orders
 - Clearing prices for balancing capacity
 - Allocated CZC for the exchange of balancing capacity or sharing of reserves
- Constraints:
 - Matched volume of balancing capacity offers must equal balancing capacity demand for each TSO within a balancing capacity cooperation
 - the sum of allocated CZC to the balancing capacity market may not exceed the total available CZC

4.3 Sharing of congestion income of cross zonal capacity

The rules applied for the sharing of congestion income are equal to the ones developed for the balancing energy market and based on the All TSOs' Proposal for a Congestion Income Distribution (CID) methodology in accordance with Article 57 of the Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline on forward capacity allocation.

For each BZB on which congestion income results from the exchange of balancing capacity or sharing of reserves, in accordance with the calculation of congestion income from the SDAC, the TSOs on each side of the balancing capacity border shall receive their share of net border congestion income based on a 50%-50% sharing key. In specific cases, the concerned TSOs may also use a sharing key different from 50%-50%. Such cases may be due to the different ownership shares, different shares of investments costs, exemption decisions¹ or decisions on cross-border cost allocation² by competent NRAs or the Agency.

In case the BZB consists of several interconnectors with different sharing keys, on which are owned by different TSOs, the net border balancing capacity congestion income shall be assigned first to the respective interconnectors on that BZB based on each interconnector's contribution to the allocated capacity. The parameters defining the contribution of each interconnector will be agreed by the TSOs on the BZB. In

¹ Exemption decision granted to these entities by relevant competent Authorities in accordance with article 17 of Regulation (EC) 714/2009.

² Decisions on cross-border cost allocation granted to these entities by relevant competent Authorities or the Agency in accordance with article 12(4) or 12(6) of Regulation (EC) 347/2013.

case specific interconnectors are owned by entities other than TSOs, the reference to TSOs in this article shall be understood as referring to those entities.

Specific sharing keys and parameters shall be published in a common document by ENTSO-E on its web page for information purposes only.

Due to an impact of allocating CZC for the exchange of balancing capacity or sharing of reserves on SDAC CID, certain measures had to be taken. The potential missing money problem could happen as the obligations to remunerate Long-Term Transmission rights are bound to the borders in Day-Ahead timeframe. By providing a specific amount of balancing income to SDAC CID process it will be ensured, that the remuneration of Long-Term Transmission rights will not lead into a deficit of revenue and none of the TSOs will be disadvantaged at the expense of CZC allocation for the exchange of balancing capacity or sharing of reserves. The fragile equilibrium of these processes cannot be disturbed, since any withdrawal of money from the algorithm can lead to a deepening of the problem and also to its transfer to all TSOs in the region due to the functioning principle of socialization.

The amount of income that is transferred for the purposes of the SDAC CID processes is equal to the amount of CZC allocated this way multiplied by the resulting Day-Ahead market spread between two relevant hubs. Congestion Income (CI) from balancing should be on average higher than the missing CI from DA market trading as is a result of optimization and the prices for balancing CZC should be higher as well. However, it is not ensured that it is true for 100 % of trading hours. Therefore, a special account will be set up for process coverage, where congestion income generated by CZC allocated for the exchange of balancing capacity or sharing of reserves will be collected for at least one month. Remaining surplus after a one month will be assigned to relevant balancing borders on pro-rata basis according to the congestion income originally generated by the exchange of balancing capacity or sharing of reserves. Sharing of the final balancing congestion income attributed to each TSO shall be then distributed pursuant to the first three paragraphs of this article.

4.4 Firmness regime of cross zonal capacity

Allocated CZC for the exchange of balancing capacity or sharing of reserves shall be firm after the selection of standard upward balancing capacity bids or standard downward balancing capacity bids by the capacity procurement optimisation function pursuant to Article 33(3) of the EBGL.

According to Article 38(9) of the EBGL, when CZC allocated for the exchange of balancing capacity or sharing of reserves has not been used for the associated exchange of balancing energy, it shall be released for the exchange of balancing energy for all TSOs on the balancing energy platform with shorter timeframes.

The costs of ensuring firmness or in the case of curtailment of firm CZC in the event of force majeure or emergency situations are borne by the relevant TSOs sharing the CZC. These costs include the additional costs from the procurement of balancing capacity due to the non-availability of the balancing capacity given the curtailment of CZC.

5 Results from the Public Consultation

| General comments | | | | |
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| No | Stakeholder | | Comments from stakeholders | Answers from TSOs |
| 1 | EFET | | By allocating transmission capacity specifically for use in the balancing timeframe, TSOs remove available capacity from the allocation in the other timeframes, thereby restricting market participants' ability to adjust their positions across borders in the most economically efficient manner, and to contribute to overall system balance. | The EBGL fosters competition and efficient markets over all timeframes and all products. TSOs are of the opinion that CZC should be allocated to the market where its value is highest, based on market outcome, and consequently this is not necessarily always the day-ahead market. The Commission Regulation (EU) 2017/2015 establishing a guideline on electricity balancing proposes the application of cross-zonal capacity allocation for the balancing process to improve competition by means of cross zonal balancing exchanges. This implies that the balancing capacity market may compete on CZC with the single day-ahead coupling. Hansa TSOs have decided to at least establish the ground rules for a fair competition to foster the procurement of balancing capacity from frequency restoration reserves (FRR) and/or replacement reserves (RR) in between week ahead and day ahead. These reserves are the system's insurance to make sure that in real-time at minimum of balancing energy is available to cope with imbalances in the system, based on cross-border markets. |
| 2 | EFET | | The use of cross-border transmission capacity is a key element of European market integration in the forward, day-ahead and intraday timeframes. A major objective of integration projects such as the EU Harmonised Allocation Rules for forward transmission rights, as well as single day-ahead and intraday coupling are to improve the access and use of such transmission capacity by the market. Reserving capacity (from the forward timeframe until the intraday market) for use by the TSOs in the balancing timeframe would turn the clock back on those improvements. | Hansa TSOs consider the balancing capacity as a timeframe part of the European market integration. Consequently, cross-border transmission capacity should be allocated in the areas where it creates most benefit to all market participants. |

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| 3 | EFET | | <p>We (therefore) consider that the “market-based” designation chosen for this cross-zonal capacity reservation process is incorrect. Besides, ignoring the intraday market in the cross-zonal capacity reservation process, in practice, forecloses opportunities for market participants to adjust their positions. Ignoring the intraday market, in practice, forecloses opportunities for market participants to adjust their positions in intraday across borders and will lead to changes in the bidding process.</p> | <p>TSOs acknowledge that there is a value for CZC for the ID. However, there is also a value of CZC for the timeframe of balancing energy, for cross-border redispatch etc. The cleanest comparison on the available CZC at the SDAC timeframe is comparison of 2 separate markets, the SDAC and the balancing capacity market, likewise the co-optimisation. Since co-optimisation is not implementable in near future, the market-based allocation is the alternative.</p> |
| 4 | EFET | | <p>the current proposal relies on the selection of “reference days” and possible “adjustment factors”. Neither of the two components is specified further. We therefore strongly doubt that the current proposal is in line with Article 41.1(b) EB GL that explicitly requests a “detailed description on how to determine [...] the forecasted market value of cross-zonal capacity for the exchange of energy”. Referring to concepts of “reference days” and “adjustment factors” and postponing the definition of such elements to the BCC (balancing capacity cooperation) proposals is insufficient.</p> | <p>Acknowledged, consequently Hansa TSOs have provided the rules on determination of reference periods. Furthermore, each balancing capacity cooperation shall analyse and monitor, make public and take actions to improve efficiency if the evaluation proves the inefficiency of the chosen mark-up and adjustment factor. Since mark-ups will only be applied if necessary, no detailed rules are provided. The choice is within the entire BCC, including the transparency of application of mark-ups per BCC.</p> |
| 5 | EFET | | <p>the TSOs will need to allocate to the market a minimum of 70% transmission capacity respecting operational security limits after deduction of contingencies. As the transmission capacity reserved by the TSOs through the “market-based” allocation process would be used by the TSOs themselves for the exchange of balancing capacity or the sharing of reserves, we would welcome a clear statement by the TSOs that this capacity will not be counted within the minimum 70% threshold.</p> | <p>Art. 38-42 of the EBGL prescribes that CZC available for SDAC (minimum 70% threshold) is in future in competition with the balancing capacity market consisting of TSOs and BSPs. Still 70% shall be made available for the SDAC timeframe, but the logical consequences of the transparent economic benefit optimisation prove might result in 68% to be used for DAM and 2% to balancing capacity market within the SDAC timeframe.</p> |
| 6 | EFET | | <p>Given the overall lack of justification for cross-zonal capacity reservation for balancing purposes, and the missing impact assessment regarding the effects of a so-called “market-based” cross-zonal capacity allocation</p> | <p>Hansa TSOs acknowledge the missing level of detail and have improved the proposal and explanatory document to provide more transparency. In addition, each BCC in Hansa shall monitor, analyse and make public the efficiency of the</p> |

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| | | | for the exchange of balancing capacity or sharing of reserves in particular, we invite Hansa TSOs to withdraw their proposal altogether. | optimisation and the forecasting. The withdrawal of the market-based methodology is not in line with the future development of European markets, also for balancing capacity. |
| 7 | EFET | | Should Hansa TSOs persist to issue this methodology, we invite individual Hansa TSOs and NRAs to refrain from implementing this cross-border capacity reservation process, or any of the two others foreseen by the EB GL (co-optimisation under article 40, and the so-called "economic efficiency" allocation method under article 42). | Hansa TSOs have decided to develop this methodology to keep possible future European markets alive. No intention is present to apply this methodology currently. Economic efficiency requires procurement far ahead of real-time (more than one week) which is not in the interest of Hansa TSOs and therefore no such submission is foreseen. Co-optimisation can be considered as the future target, nevertheless a true co-optimisation requires a long lead time for implementation to not distort two parallel markets that without linking of bids are disconnected. |
| 8 | Orsted | | we emphasize that transparency, as well as a continuous monitoring of the methodology in reserving CZC for the exchange of balancing capacity or sharing of reserves is crucial to assess and minimize negative effects/unnecessary market disturbances. | Acknowledged, consequently Hansa TSOs have included requirements on analysis, monitoring and publication for each BCC within Hansa on the efficiency of forecasting and allocation of CZC. |
| 9 | Orsted | | the proposal should: 1. Specify criteria for forecasting the market value of CZC for the exchange of energy in a clearer way, including a clear description and justification of the choice of the reference day in the proposal (and not only in the Explanatory Document); 2. Specify a process to revise the quality of the forecasting method; and 3. Establish a fully transparent notification process to market participants of the use of reservation. | Acknowledged: 1. TSOs have specified reference periods, 2. require for each BCC in Hansa the analysis, monitoring and publication on the efficiency of forecasting and optimisation of CZC. 3. Results will be made public to all stakeholders |

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| 10 | NordPool Group | | As a principle; the maximum available trading capacity should always be given to the first market at hand with no reservation of cross-zonal capacity for the later market | The EBGL fosters competition and efficient markets over all timeframes and all products. TSOs are of the opinion that CZC should be allocated to the market where its value is highest, based on market outcome, and consequently this is not necessarily always the day-ahead market. The Commission Regulation (EU) 2017/2015 establishing a guideline on electricity balancing proposes the application of cross-zonal capacity allocation for the balancing process to improve competition by means of cross zonal balancing exchanges. This implies that the balancing capacity market may compete on CZC with the single day-ahead coupling. Hansa TSOs have decided to at least establish the ground rules for a fair competition to foster the procurement of balancing capacity from frequency restoration reserves (FRR) and/or replacement reserves (RR) in between week ahead and day ahead. These reserves are the system's insurance to make sure that in real-time at minimum of balancing energy is available to cope with imbalances in the system, based on cross-border markets. |
| 11 | NordPool Group | | Any reservation of capacity for the purpose of exchange of balancing capacity and sharing of reserves needs to be justified on a per border basis by TSOs and approved by the corresponding NRAs. | If two or more TSO in the Hansa region decide to implement the market-based allocation process this will be preceded by an impact assessment for that cooperation. |
| 12 | NordPool Group | | The proposed mechanisms and formulas to apply, for both the forecasted market value of (a) CZC for exchanging energy (SDAC) and likewise for (b) the exchange of balancing capacity or sharing of reserves between bidding zones, can frequently be of rather poor quality because for (a) it is difficult to find a stable reference period from SDAC to use and for (b) there will at the time of selection of CZC allocation to energy (spot) or to (balancing) be very limited balancing bids/offers given by market players and accordingly the forecasted value of allocation of CZC in favour of balancing may easily appear to be | TSOs acknowledge the complexity of forecasting instead of the pure market comparison of co-optimisation. Since the implementation of co-optimisation includes higher complexity, an intermediate alternative is still market-based allocation. Inefficiency of reference periods shall be improved by means of adjustment factors. Distortive impact of limited balancing bids can be taken into account with mark-ups enabling conservative allocation to the balancing capacity market, and via further reduction of the maximum allocation of CZC to balancing capacity. |

| | | | much larger than reality. | |
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| Specific comments | | | | |
| No | Stakeholder | Article | Comments from stakeholders | Answer from TSOs |
| 1 | EFET | Recital 3: | This recital gives the false idea that the current methodology development is a requirement of the EB GL. | Article 41 of the EBGL indeed does not provide a requirement, nonetheless Article 38.3 provides the requirement that all TSOs shall harmonise per timeframe the methodologies on CZC allocation, including the market-based timeframe. This Art. 41 is considered as the preparatory proposal for the required proposal for all timeframes. In order to properly take into account, the Hansa region, this methodology will be submitted to the Hansa NRAs. |
| 2 | EFET | Recital 3: | we fundamentally oppose the statement that the reservation of cross-zonal capacity by the TSOs for balancing purposes would or could, in any way, "increase the liquidity of short-term markets by allowing for more cross-zonal trade". We request the deletion of this second part of the recital. | Balancing capacity and balancing energy, likewise SDAC and SIDC are in Hansa TSOs perspective short-term markets. The market-based allocation includes the procurement of balancing capacity at D-1. Connecting national balancing capacity markets is the last step to develop short-term European markets like SDAC, SIDC and balancing energy markets. |
| 3 | EFET | Recital 11: | We challenge the assertion of the TSOs that cross-zonal capacity reservation in general, and this methodology for a "market-based" method of cross-zonal capacity reservation, would facilitate "the efficient and consistent functioning of day-ahead, intraday and balancing markets" (article 3.1.d EB GL). By allocating transmission capacity specifically for use in the balancing timeframe, TSOs remove available capacity from the allocation in the other timeframes, thereby restricting market participants' ability to adjust their positions across borders in the most economically efficient manner, and to contribute to overall system balance. The TSOs have not provided evidence that the present methodology would actually not violate the principle of article 3.1.d EB GL. At the very least, | The EBGL fosters competition and efficient markets over all timeframes and all products. TSOs are of the opinion that CZC should be allocated to the market where its value is highest, based on market outcome, and consequently this is not necessarily always the day-ahead market. The Commission Regulation (EU) 2017/2015 establishing a guideline on electricity balancing proposes the application of cross-zonal capacity allocation for the balancing process to improve competition by means of cross zonal balancing exchanges. This implies that the balancing capacity market may compete on CZC with the single day-ahead coupling. Hansa TSOs have decided to at least establish the ground rules for a fair competition to foster the procurement of balancing capacity from frequency restoration reserves (FRR) and/or replacement reserves (RR) in between week ahead and day ahead. These |

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| | | | we would like to see any reference to a positive contribution to the functioning of day-ahead and intraday markets removed from this recital. | reserves are the system's insurance to make sure that in real-time at minimum of balancing energy is available to cope with imbalances in the system, based on cross-border markets. Evidence shall be provided before the start of each BCC and the efficiency of CZC allocation shall be monitored, analysed and made public/transparent. |
| 4 | EFET | Recital 15: | We request the inclusion of the following requirements in the main body of the Hansa TSOs' proposal: <ul style="list-style-type: none"> - the Hansa TSOs that want to establish a BCC shall share with Hansa TSOs the cost-benefit analysis of such a BCC - the CBA shall also be distributed to Hansa NRAs and market participants - the decision to establish a BCC shall be excluded unless the CBA is positive - the relevant NRAs' decision to approve or not a BCC shall take account of the results of the CBA | Acknowledged, the methodology has been improved accordingly. Articles 3.2, 4.1, 7.9 and Article 12. |
| 5 | EFET | Recital 15: | Besides, we miss in this methodology the regular assessment to be performed by TSOs with regard to the continued necessity or not of a BCC according to article 38.8 EB GL. This provision is actually included in the CORE TSOs' draft methodology for the "economic efficiency" method of cross-zonal capacity reservation for balancing (article 42 EB GL), at the article 3.9 of that methodology. We would like to see a similar provision (complemented with a precise timing for the regularity of the checks and an obligation to disclose these assessments to the relevant NRAs and market participants). | Please see Article 7.9 of the methodology |
| 6 | EFET | Article 3 | The article is missing the following specifications: <ul style="list-style-type: none"> - limitation of the BCC to standard balancing capacity products according to article 25.2 - information on the minimum and maximum contracting period - harmonisation of pricing rules within each BCC | Please see Article 3 |
| 7 | EFET | Article 3 | An additional requirement should be formulated in article 3, stating that the calculation of the CZCA must not | A new Article 5 has been included to describe the timing and steps of the process of market-based allocation of |

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| | | | take longer than selecting bids without using a BCC, which should essentially be a few minutes (if not seconds). | CZC. |
| 8 | EFET | Article 3.2 | This paragraph is, however, partially repeated in article 9.2. | Correct, TSOs still insist on keeping the wording to capture firmness and basic principles per BCC. |
| 9 | EFET | Article 4.2 | We ask that the full methodology, including the forecast technique, is also shared with market participants and consulted upon. | The methodology includes now the transparent analysis and monitoring of the efficiency of forecasting and allocation of CZC and results are made public. Support from consultant is acknowledged and to be decided per BCC. |
| 10 | EFET | Article 5.1 | It should be clearly stated the 10% are applied over CZCA for all of the balancing processes, not 10% for each of aFRR, mFRR and RR, possibly summing up to 30%. | Acknowledged, proposal has been changed |
| 11 | EFET | Article 5.2 | We would welcome a clearer wording that individual BCCs can set only a lower threshold than the maximum 10% | Acknowledged, proposal has been changed |
| 12 | EFET | Article 6.5 | Ignoring the intraday market, in practice, forecloses opportunities for market participants to adjust their positions in intraday across borders. This contradicts some of the most fundamental principles in the EB GL itself: Recital 12 "The integration of balancing energy markets should facilitate the efficient functioning of the intraday market in order to provide the possibility for market participants to balance themselves as close as possible to real time." | TSOs still conclude to not take the ID market value into account since: Market participants consider the value of ID in the bidding of SDAC, where BSPs also consider the value of balancing energy in their bidding of balancing capacity; the clean competition of CZC at the SDAC timeframe is the DAM and the balancing capacity market. Balancing energy and SIDC are markets connected, but not the markets itself competing in this relevant timeframe. Including ID also includes competition between SDAC and SIDC at the expense of SIDC; Another forecast component is not in line with the future goal of co-optimisation; SIDC does not include one single auction likewise SDAC and BC. |
| 13 | EFET | Article 6.6 | we strongly doubt that the reference to "reference days" without further specification is in line with Article 41.1(b) EB GL that explicitly requests a "detailed description on how to determine [...] the forecasted market value of cross-zonal capacity for the exchange of energy". | Acknowledged, the methodology has been improved accordingly. |

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| 14 | EFET | Article 6.7 | We strongly doubt that the reference to “adjustment factors” without further specification is in line with Article 41.1(b) EB GL that explicitly requests a “detailed description on how to determine [...] the forecasted market value of cross-zonal capacity for the exchange of energy”. Referring to the concept of “adjustment factors” and postponing the definition of such elements to the BCC proposals is insufficient. | Acknowledged, the methodology has been improved accordingly. |
| 15 | EFET | Article 6.8 | TSOs should publish the forecasted market values on a continuous basis (with as little of a delay as possible) and not only the efficiency of the forecasted market values as currently set out in this paragraph. | Acknowledged, the methodology has been improved and a requirement on sharing market values per BCC has been included |
| 16 | EFET | Article 7.5 | changes in the bidding behaviour of market participants compared to what the TSOs have modelled or are expecting should not be underestimated. This will require time to adapt and alignment with TSOs in order to design it. As we mentioned in earlier points, ignoring the intraday market, in practice, forecloses opportunities for market participants to adjust their positions and will lead to changes in the bidding process. | Each balancing capacity cooperation can limit allocation of CZC to balancing capacity especially in the starting phase of the cooperation. Therefore, time is provided. Furthermore, mark-ups are a second tool to protect process of CZC allocation. |
| 17 | EFET | Article 9.2 | This paragraph is, however, a partial repetition of article 3.2. | Correct, TSOs still insist on keeping the wording to capture firmness and basic principles per BCC. |
| 18 | EFET | Article 9.4 | We welcome this requirement that the application of cross-border capacity reservation should not increase the day-ahead or intraday reliability margins used by the TSOs. | Thank you |
| 19 | EFET | Article 11.3 | For the sake of transparency, this information should be published together with the results of the capacity procurement process, according to the same timing as laid down in article 11.2. | The provided timing requirements are based on EBGL. |
| 20 | EFET | Article 11.5 | We believe that a minimum three-month notice to market participants is necessary for appropriate preparation. | Acknowledged, the requirement has been changed into 3 months notification |
| 21 | EFET | Article 11.6 | It shall never be the task of a TSO to decide whether market abuse has been committed, nor to restrict market design or disclosure of price sensitive information on the basis of | This requirement is a result of the EBGL |

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| | | | a fear of such market abuse materialising. | |
| 22 | Orsted | Article 4 | We urge the TSOs to include a clear description of the notification process to market participants, not only a description of a one-off information to other European TSOs. This description should specify the process to inform market participants about every day-to-day instance of the allocation process. Among others, this should include a timeline for the publication of the capacity allocated for the exchange of balancing capacity or sharing of reserves. | TSOs have not changed the current requirements in the Hansa proposal and expect from NRAs to provide common rules applicable for all CCR proposals. |
| 23 | Orsted | Article 5 | should include an assessment of different cap levels than 10% . At least, include a requirement for a justification for choosing a 10% cap as opposed to lower alternatives. | Application of the use of further limitations is part of the assessment, monitoring and reporting on the efficiency of the CZC allocation and forecasting. |
| 24 | Orsted | Article 6 | In our view, Article 6(6) does not properly reflect the methodology for forecasting the market value of CZC for the exchange of energy described in the explanatory document. | Acknowledged, a new paragraph has been introduced specifying the use of reference periods. |
| 25 | Orsted | Article 6 | We question the robustness of the proposed methodology to forecast the market value of CZC for the exchange of energy based on reference day spot prices. | TSOs acknowledge stakeholder's reservation and take into account when starting a balancing capacity cooperation. Mark-ups and stepwise implementation of CZC allocation are in TSOs opinion the appropriate tools. |
| 26 | Orsted | Article 6 | we note that the detailed rules for defining the reference day and when to deviate from it should be part of the current proposal and regulatory approval. | Acknowledged, a new paragraph has been introduced specifying the use of reference periods. |
| 27 | NordPool Group | Article 5 | Especially in situations where the available cross-zonal capacity is reduced due to maintenance or outage or other causes,.... forecast of value of CZC can be challenging to forecast and thus should be allocated to the SDAC and SIDC and not reserved for balancing and exchange of reserves purposes. | TSOs acknowledge stakeholder's concern and methodologies provides all possible tools to each future balancing capacity cooperation in Hansa to limit allocation of CZC to the balancing capacity markets by means of further reduction of maximum allocation and application of mark-ups |
| 28 | NordPool Group | Article 6.8 | It is proposed in the methodology that TSOs shall themselves monitor the efficiency of the forecasting methodologies. In our view such monitoring should also be reviewed by an independent party and possibly the relevant NRAs. | Monitoring and reporting shall be made public, to all stakeholders. It is considered that each BCC can choose to be supported by third parties. Appropriate measures can be given by NRAs. |

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| 29 | NordPool Group | Article 11 | Reservation of capacity needs to be made public as soon as possible when it is known and at the same time for all market participants. Participants taking part in auctions should not be put in insider position by receiving information giving knowledge about cross-zonal capacity reservations that is not known publicly. | Requirements on the publication are specified in the EBGL and have been taken accordingly. In case indicated: shall publish information, this entails publication to all, not limited to some. |
| 30 | NordPool Group | Article 11 | Reservation of cross-zonal capacity from the SDAC must be known before the Cross-zonal capacities are submitted to the SDAC. Thus information about the reservation should be known and published in due time before the GCT of the SDAC. | Correct, this is in the Hansa TSOs' opinion captured by the methodology, please see the new Article 5.1 |