

# Market participants' view on the TSOs' CCM proposals

**CACM Recital 3:** This Regulation sets out minimum harmonised rules for the ultimately single day-ahead and intraday coupling, in order to provide a clear legal framework for an efficient and modern capacity allocation and congestion management system, facilitating Union-wide trade in electricity, allowing more efficient use of the network and increasing competition, for the benefit of consumers

## The TSOs' proposals generally fail these objectives:

- Most of the **CCMs lack the level of detail expected** from a methodology: the proposals describe the “**what**”, but not the “**how**”.
- The **lack of transparency on the methodologies** that will be applied in the end leaves market participants in the dark about the way the network will be operated.
- The **various CCMs seem to have been written in isolation** without describing the required overall optimisation of the European Grid.
- Some **elements simply do not comply with CACM** provisions.

# Market participants' recommendations to NRAs

Market participants and NRAs should not sign a blank cheque to TSOs on the CCMs

## The final CCMs should contain:

- **Binding details on all the elements** that will be used in the methodologies and how they will be used, e.g. selection of CNECs in CORE CCM.
- **Proper justification for deviations** by individual TSOs from the methodologies.
- **Full compliance with the CACM GL.**
- **Due consideration of the interdependencies** of the various CCMs.
- **Implementation of best practices** used in certain CCMs in all the other CCMs, e.g. mandatory consideration of costly remedial actions in IU CCM.