



NVE
The Norwegian Energy
Regulatory Authority – RME

Authority for
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Forsyningstilsynet



Bundesnetzagentur



**REQUEST FOR AMENDMENT (RfA)
BY ALL RELEVANT REGULATORY AUTHORITIES OF
THE HANSA CAPACITY CALCULATION REGION**

ON

**THE CCR HANSA COMMON COORDINATED
CAPACITY CALCULATION METHODOLOGY
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**

4 September 2020

I. Introduction and legal context

This document elaborates an agreement of all relevant Capacity Calculation Region (“CCR”) Hansa Regulatory Authorities, reached on 4 September 2020, on the present CCR Hansa Common Coordinated Capacity Calculation Methodology, hereafter referred to as “DA&ID CCM”, being the abbreviation of “Day-ahead and Intraday Capacity Calculation Methodology”.

ACER decision 04-2019 of 1 April 2019 did allocate the bidding zone border, Western Denmark (DK1) - Netherlands (NL), to CCR Hansa.

The all CCR Hansa TSOs (“Hansa TSOs”) are therefore the German TSOs, TenneT TSO GmbH and 50Hertz Transmission GmbH, the Dutch TSO, TenneT TSO NL BV, the Danish TSO, Energinet, the Swedish TSO, Svenska kraftnät, and the Polish TSO, Polskie Sieci Elektroenergetyczne S.A. The Hansa TSOs cooperate with the Norwegian TSO, Statnett, on the development of the regional terms, conditions, and methodologies, which the Hansa TSOs are obliged to submit for regulatory approval.

The all CCR Hansa Regulatory Authorities (“Hansa NRAs”) are therefore Bundesnetzagentur (“BNetzA”), Autoriteit Consument & Markt (“ACM”), Danish Utility Regulator (“DUR”), Energimarknadsinspektionen (“Ei”), and Urząd Regulacji Energetyki (“URE”). However, the views of Reguleringsmyndigheten for energi (“NVE-RME”) have been acknowledged in the process.

The Hansa TSOs had originally developed a proposal on the DA&ID CCM pursuant to Article 20(2) of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management (“CACM GL”).

On 16 December 2018, the Hansa NRAs did reach an agreement to approve the Hansa TSOs’ DA&ID CCM proposal in an amended version.

On 6 September 2019, the Dutch TSO, TenneT TSO NL BV, did submit a proposal for ACM on an approval of the present DA&ID CCM in the respect of the Netherlands.

The concerned Danish and German Ministries did on 30 June 2020 submit an application for the European Commission (“EC”) on a derogation for Kriegers Flak Common Grid Solution (“KF CGS”) in the respect of available cross-zonal transmission capacity for the benefit of priority access for wind power generated electricity.

On 6 March 2020, ACM on behalf of the Hansa NRAs requested ACER for a 6-month extension pursuant to Article 6(10) of the Regulation (EU) 2019/942. In the request for extension, the Hansa NRAs stated that within 6 months following the extension, if granted by ACER, the Hansa NRAs would strive to reach a unanimous agreement to approve the DA&ID CCM or to request an amendment of the DA&ID CCM.

By ACER decision 14-2020 of 14 July 2020, ACER granted the requested 6-month extension, thereby postponing the deadline for the Hansa NRAs’ decision-making on the DA&ID CCM to 6 September 2020.

Article 9(12) of CACM GL provides for NRAs to request of amendments of a proposal for terms, conditions, and methodologies.

Article 9(13) of CACM GL provides for TSOs, NEMOs, and or NRAs, to request for amendments of terms, conditions, and methodologies having been previously adopted.

On 4 September 2020, the Hansa NRAs reached an agreement to request for an amendment of the DA&ID CCM for CCR Hansa

- pursuant to Article 9(12) of CACM GL, in the respect of TenneT's proposal of 6 September 2019 on ACM's approval of the present Hansa DA&ID CCM, and
- pursuant to Article 9(13) of CACM GL, in the respect of the present Hansa DA&ID CCM having been previously approved on 16 December 2018 by all of the other Hansa NRAs, but ACM.

This agreement of the Hansa NRAs shall provide evidence that a decision on the present Hansa DA&ID CCM does not need to be adopted by ACER pursuant to Article 9(11) of CACM GL. Therefore, this agreement is intended to constitute the basis on which the Hansa NRAs will each subsequently request the Hansa TSOs for amendments of the present Hansa DA&ID CCM.

The legal provisions that lie at the basis of the present DA&ID CCM, and this agreement by the Hansa NRAs on a request for amendment, can notably be found in Articles 3, 9, 12, 20, 21, and 23, of CACM GL. Relevant extracts of those provisions are quoted here for reference:

Article 3 of CACM GL

This Regulation aims at:

- (a) *Promoting effective competition in the generation, trading and supply of electricity;*
- (b) *Ensuring optimal use of the transmission infrastructure;*
- (c) *Ensuring operational security;*
- (d) *Optimising the calculation and allocation of cross-zonal capacity;*
- (e) *Ensuring fair and non-discriminatory treatment of TSOs, NEMOs, the Agency, regulatory authorities and market participants;*
- (f) *Ensuring and enhancing the transparency and reliability of information;*
- (g) *Contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union;*
- (h) *Respecting the need for a fair and orderly market and fair and orderly price formation;*
- (i) *Creating a level playing field for NEMOs;*
- (j) *Providing non-discriminatory access to cross-zonal capacity*

Article 9 of CACM GL

1. *TSOs and NEMOs shall develop the terms and conditions or methodologies required by this Regulation and submit them for approval to the competent regulatory authorities within the respective deadlines set out in this Regulation. Where a proposal for terms and conditions or methodologies pursuant to this Regulation needs to be developed and agreed by more than one TSO or NEMO, the participating TSOs and NEMOs shall closely cooperate. TSOs, with the assistance of ENTSO for Electricity, and all NEMOs shall regularly inform the competent*

regulatory authorities and the Agency about the progress of developing these terms and conditions or methodologies.

[...]

5. *Each regulatory authority shall approve the terms and conditions or methodologies used to calculate or set out the single day-ahead and intraday coupling developed by TSOs and NEMOs. They shall be responsible for approving the terms and conditions or methodologies referred to in paragraphs 6, 7 and 8.*

[...]

7. *The proposals for the following terms and conditions or methodologies shall be subject to approval by all regulatory authorities of the concerned region:*
 - (a) *the common capacity calculation methodology in accordance with Article 20(2);*

[...]

9. *The proposal for terms and conditions or methodologies shall include a proposed timescale for their implementation and a description of their expected impact on the objectives of this Regulation. Proposals on terms and conditions or methodologies subject to the approval by several or all regulatory authorities shall be submitted to the Agency at the same time that they are submitted to regulatory authorities. Upon request by the competent regulatory authorities, the Agency shall issue an opinion within three months on the proposals for terms and conditions or methodologies.*

10. *Where the approval of the terms and conditions or methodologies requires a decision by more than one regulatory authority, the competent regulatory authorities shall consult and closely cooperate and coordinate with each other in order reach an agreement. Where applicable, the competent regulatory authorities shall take into account the opinion of the Agency. Regulatory authorities shall take decisions concerning the submitted terms and conditions or methodologies in accordance with paragraphs 6, 7 and 8, within six months following the receipt of the terms and conditions or methodologies by the regulatory authority or, where applicable, by the last regulatory authority concerned.*

[...]

12. *In the event that one or several regulatory authorities request an amendment to approve the terms and conditions or methodologies submitted in accordance with paragraphs 6, 7 and 8, the relevant TSOs or NEMOs shall submit a proposal for amended terms and conditions or methodologies for approval within two months following the requirement from the regulatory authorities. The competent regulatory authorities shall decide on the amended terms and conditions or methodologies within two months following their submission. Where the competent regulatory authorities have not been able to reach an agreement on terms and conditions or methodologies pursuant to paragraphs (6) and (7) within the two-month deadline, or upon their joint request, the Agency shall adopt a decision concerning the amended terms and conditions or methodologies within six months, in accordance with Article 8(1) of Regulation (EC) No 719/2009. If the relevant TSOs or NEMOs fail to submit a proposal for amended terms and conditions or methodologies, the procedure provided for in paragraph 4 of this Article shall apply.*

13. *TSOs or NEMOs responsible for developing a proposal for terms and conditions or methodologies or regulatory authorities responsible for their adoption in accordance with paragraphs 6, 7 and 8, may request amendments of these terms and conditions or methodologies. The proposals for amendment to the terms and conditions or methodologies*

shall be submitted to consultation in accordance with the procedure set out in Article 12 and approved in accordance with the procedure set out in this Article.

[...]

Article 12 of CACM GL

1. *TSOs and NEMOs responsible for submitting proposals for terms and conditions or methodologies or their amendments in accordance with this Regulation shall consult stakeholders, including the relevant authorities of each Member State, on the draft proposals for terms and conditions or methodologies where explicitly set out in this Regulation. The consultation shall last for a period of not less than one month.*
2. *[...] Proposals submitted by the TSOs and NEMOs at regional level shall be submitted to consultation at least at regional level. [...]*
3. *The entities responsible for the proposal for terms and conditions or methodologies shall duly consider the views of stakeholders resulting from the consultations undertaken in accordance with paragraph 1, prior to its submission for regulatory approval if required in accordance with Article 9 or prior to publication in all other cases. In all cases, a clear and robust justification for including or not the views resulting from the consultation shall be developed in the submission and published in a timely manner before or simultaneously with the publication of the proposal for terms and conditions or methodologies.*

Article 20 of CACM GL

1. *For the day-ahead market time-frame and intraday market time-frame the approach used in the common capacity calculation methodologies shall be a flow-based approach, except where the requirement under paragraph 7 is met.*
2. *[...], all TSOs in each capacity calculation region shall submit a proposal for a common coordinated capacity calculation methodology within the respective region. The proposal shall be subject to consultation in accordance with Article 12. [...]*

[...]

7. *TSOs may jointly request the competent regulatory authorities to apply the coordinated net transmission capacity approach in regions and bidding zone borders other than those referred to in paragraphs 2 to 4, if the TSOs concerned are able to demonstrate that the application of the capacity calculation methodology using the flow-based approach would not yet be more efficient compared to the coordinated net transmission capacity approach and assuming the same level of operational security in the concerned region.*

[...]

Article 21 of CACM GL

1. *The proposal for a common capacity calculation methodology for a capacity calculation region determined in accordance with Article 20(2) shall include at least the following items for each capacity calculation time-frame:*

- (a) *methodologies for the calculation of the inputs to capacity calculation, which shall include the following parameters:*

[...]

- (ii) *the methodologies for determining operational security limits, contingencies relevant to capacity calculation and allocation constraints that may be applied in accordance with Article 23;*

[...]

Article 23 of CACM GL

[...]

3. *If TSOs apply allocation constraints, they can only be determined using:*

- (a) *constraints that are needed to maintain the transmission system within operational security limits and that cannot be transformed efficiently into maximum flows on critical network elements; or*
- (b) *constraints intended to increase the economic surplus for single day-ahead or intraday coupling.*

II. The present DA&ID CCM

The present Hansa DA&ID CCM covers the capacity calculation methodologies for the day-ahead (“DA”) and intraday (“ID”) timeframes. Furthermore, the present Hansa DA&ID CCM is based on a Coordinated Net Transmission Capacity (“CNTC”) approach with a strong link to the adjacent CCRs, i.e. CCR Nordic and CCR Core.

Article 4(1) to (2), and Article 12(1) to (2), of the DA&ID CCM contain mathematical descriptions for calculation of Available Transfer Capacity (“ATC”), in the DA&ID timeframes respectively, on the DC and AC lines respectively, between Hansa bidding zones.

Article 4(3), and Article 12(3), of the DA&ID CCM contain mathematical descriptions for calculation of ATC, in the DA&ID timeframes respectively, on KF CGS, being a hybrid interconnector and offshore wind farms grid connection on the Hansa bidding zone border, DK2-DE/LU.

Article 8 of the DA&ID CCM contains a methodology on allocation constraints.

Thus, Article 8(1)(a) to (d), defines four different available allocation constraints to be applied on Hansa bidding zone borders, while Article 8(2) to (5) set substantial requirements for each of the four types of allocation constraints, referred to in Article(1)(a) to (d).

Article 8(6) requires that each Hansa TSO applying one or more allocation constraints, referred to in Article 8(1), shall describe the allocation constraint(s) with the applied limits and communicate these transparently to the market participants together with the a justification. Article 8(7), 2nd subparagraph, states that upon request of Hansa NRAs, Hansa TSOs shall provide additional information on allocation constraints.

Article 8(1)(c), refers to ramping restrictions on both DC lines and on KF CGS, and Article 8(4), refers to maximum change both in DC flows and in KF CGS market flows.

In close connection to the Hansa NRAs' approval on 16 December 2018 of the present DA&ID CCM, the Hansa NRAs did on 16 January 2019 adopt a specific agreement on "Allocation Constraints in the CACM Regulation and in the Hansa CCM", ref. to Article 8(7) of the DA&ID CCM. It follows e.g. from that agreement that the Hansa NRAs request the all Hansa TSOs to submit, for all future allocation constraints to be applied on Hansa bidding zone borders, detailed descriptions and justifications by the latest 2 months before the allocation constraint is planned to be applied.

Article 10 of the DA&ID CCM contains a methodology on remedial actions. Hereunder Article 10(2), is a specific provision on KF CGS.

Article 11 of the DA&ID CCM contains rules on taking into account, previously allocated cross-zonal capacity in the DA timeframe. Hereunder Article 11(1)(c), is a specific provision on KF CGS.

Article 15 of the DA&ID CCM contains rules on taking into account, previously allocated cross-zonal capacity in the ID timeframe. Hereunder Article 15(1)(d), is a specific provision on KF CGS.

III. Agreed Hansa NRAs' position

The Hansa NRAs are not in support of the present DA&ID CCM for the reasons, which are detailed below, and request the Hansa TSOs to amend the present DA&ID CCM, and to incorporate the following assessments of the Hansa NRAs, pursuant to Article 9(12) and Article 9(13) of CACM GL.

IV. Requests for amendments of the present DA&ID CCM

Amending references to Regulation (EU) no 714/2009 to references to Regulation (EU) 2019/943

The Hansa NRAs request the Hansa TSOs to amend references to Regulation (EU) no 714/2009 to references to Regulation (EU) 2019/943, in Recital (2), and in Article 2(1), of the DA&ID CCM.

Recital (2), Article 2(1), Article 4(3), Article 8(1)(c) and (4), Article 10(2), Article 11(1)(c), Article 12(3), and Article 15(1)(d), in conjunction with the European Commission's pending decision on KF CGS

The current provisions on KF CGS within the present Hansa DA&ID CCM do not find unanimous support among Hansa NRAs because of uncertainties concerning the legal basis for KF CGS.

The concerned Danish and German Ministries have on 30 June 2020 submitted an application for the European Commission ("EC") on a derogation for KF CGS in the respect of available cross-zonal transmission capacity for the benefit of priority access for wind power generated electricity.

The EC's pending decision will provide for clarity, whether a derogation may be granted for KF CGS in respect of available cross-zonal transmission capacity for the benefit of priority access for wind power generated electricity, and thus constitute the necessary legal basis for KF CGS in terms of the present Hansa DA&ID CCM.

Thus, Hansa NRAs require the following amendments of the present Hansa DA&ID CCM, in the respect of KF CGS:

A) In the case that the EC's decision, granting a derogation for KF CGS, is published officially prior to the consultation of the Hansa TSOs' amendment proposal on the DA&ID CCM pursuant to Article 12, cf. Article 9(13), 2nd subparagraph, of CACM GL, the Hansa TSOs are requested,

- 1) to maintain, and if needed to adjust to EC's decision,
 - a) within the amendment proposal, the provisions on KF CGS,
 - i) Article 4(3),
 - ii) Article 10(2),
 - iii) Article 11(1)(c),
 - iv) Article 12(3), and
 - v) Article 15(1)(d)
 - b) within the amendment proposal, the wordings,
 - i) "and KF CGS", in Article 8(1)(c), and
 - ii) "and KF CGS market flows", in Article 8(4)
- 2) within the amendment proposal, to insert references to EC's decision as the legal basis for the CCR Hansa DA&ID CCM on KF CGS, in
 - a) Recital (2), and
 - b) Article 2(1)
- 3) to include explanations, in the recitals and in an explanatory document to the amendment proposal on the DA&ID CCM, on the implications of EC's decision for the chosen approach on KF CGS in the DA&ID CCM.

B) In the case that the EC's decision, granting a derogation for KF CGS, is not published officially prior to the consultation of the Hansa TSOs' draft amendment proposal on the DA&ID CCM pursuant to Article 12, cf. Article 9(13), 2nd subparagraph, of CACM GL, the Hansa TSOs are requested, within the amendment proposal,

- 1) to remove from the present DA&ID CCM, the provisions on KF CGS,
 - a) Article 4(3),
 - b) Article 10(2),
 - c) Article 11(1)(c),
 - d) Article 12(3), and
 - e) Article 15(1)(d)
- 2) to remove from the present DA&ID CCM, the wordings,
 - a) "and KF CGS", in Article 8(1)(c), and
 - b) "and KF CGS market flows", in Article 8(4)
- 3) to add a provision that the Hansa TSOs (provided EC's decision grants a derogation for KF CGS,

and that decision is published officially within or after the consultation period, pursuant to Article 12 of CACM GL, but prior to the Hansa TSOs' submission of an amendment proposal on the DA&ID) will resubmit a draft amendment proposal on the DA&ID CCM for consultation, pursuant to Article 12 of CACM GL, and will

- a) reinsert within that new amendment proposal, and if needed to adjust to EC's decision, the provisions on KF CGS,
 - i) Article 4(3),
 - ii) Article 10(2),
 - iii) Article 11(1)(c),
 - iv) Article 12(3), and
 - v) Article 15(1)(d)
- b) reinsert within that new amendment proposal, and if needed to adjust to EC's decision, the wordings,
 - i) "and KF CGS", in Article 8(1)(c), and
 - ii) "and KF CGS market flows", in Article 8(4).
- c) insert within that new amendment proposal, references to EC's decision as the legal basis for the CCR Hansa DA&ID CCM on KF CGS, in
 - i) Recital (2), and
 - ii) Article 2(1).
- d) to include explanations, in the recitals and in an explanatory document to the new amendment proposal, on the implications of EC's decision for the chosen approach on KF CGS in the DA&ID CCM.

C) In the case that the EC decides negatively on a derogation for KF CGS, prior to the consultation of the Hansa TSOs' draft amendment proposal on the DA&ID CCM pursuant to Article 12, cf. to Article 9(13), 2nd subparagraph, of CACM GL, the Hansa TSOs are requested within the amendment proposal,

- 1) to remove from the present DA&ID CCM, the provisions on KF CGS,
 - a) Article 4(3),
 - b) Article 10(2),
 - c) Article 11(1)(c),
 - d) Article 12(3), and
 - e) Article 15(1)(d)
- 2) to remove from the present DA&ID CCM, the wordings,
 - a) "and KF CGS", in Article 8(1)(c), and
 - b) "and KF CGS market flows", in Article 8(4).

Adding a missing reference to Article 23(3)(b) of CACM GL in Article 8(1) of the present DA&ID CCM

The Hansa NRAs request the Hansa TSOs to amend Article 8(1) of the present DA&ID CCM in the respect of inserting an else missing reference to Article 23(3)(b) of CACM GL, "In accordance with Article 23(3)(a) or (b) of the CACM Regulation".

Information procedure on future applications of allocation constraints on Hansa bidding zone borders

The Hansa NRAs approved the present DA&ID CCM in follow-up of the Hansa TSOs' proposal in an amended version. However, the NRAs were less satisfied that the TSOs' amendment proposal did not fully comply with the NRAs' request for amendment of the TSOs' original proposal, in the respect of the provisions on allocation constraints. Thus, NRAs did request that TSOs applying allocation constraints should regularly submit information for NRAs to show to which extent, these allocation constraints have limited the market, including the shadow prices of the allocation constraints.

This led to Hansa NRAs adopting a specific agreement of 16 January 2019 on "Allocation Constraints in the CACM Regulation and in the Hansa CCM", ref. to Article 8(7) of the DA&ID CCM. It follows from that agreement that the all Hansa NRAs request the all Hansa TSOs to submit,

- For all allocation constraints currently applied to Hansa bidding zone borders; detailed descriptions and justifications by 16 July 2019.
- For all future allocation constraints to be applied to Hansa bidding zone borders; detailed descriptions and justifications by the latest 2 months before the allocation constraint is planned to be applied.

The all Hansa TSOs have complied on the descriptions etc. on the current allocation constraints.

A primary purpose of this actual request for amendment by all Hansa NRAs on the present DA&ID CCM for CCR Hansa is to include the Dutch TSO, TenneT TSO NL BV, and ACM, fully in the CCR Hansa framework. Thus, ACM should principally approve the DA&ID CCM for CCR Hansa, as well as the Hansa NRA's agreement of 16 January 2019 on allocation constraints in CCR Hansa.

In the respect of a comprehensive approach, Hansa NRAs request Hansa TSOs to incorporate into the present DA&ID CCM, the Hansa TSOs' agreement of 16 January 2019 in the respect of submitting information on future applications of allocation constraints on Hansa bidding zone borders. For that incorporation, the Hansa NRAs take into account the most likely circumstances that two TSOs on each side of a bidding zone border are planning on an application of allocation constraints on that bidding zone border. This aspect differs from the Hansa NRAs' agreement of 16 January 2019, requesting *all* Hansa TSOs to inform on future applications of allocation constraints.

Thus, Hansa NRAs request Hansa TSOs to amend Article 8(6), in the DA&ID CCM, as follows:

"If one, more, or all CCR Hansa TSOs plan to apply one or more of the allocation constraints, referred to in Article 8(1), on Hansa bidding zone borders, the relevant CCR Hansa TSOs shall inform market participants, the other CCR Hansa TSOs, and the all CCR Hansa regulatory authorities, on the planned allocation constraints, accompanied by detailed descriptions and justifications for the allocation constraints in question, at the latest 2 months prior to the planned application of those allocation constraints."

Also, Hansa NRAs request Hansa TSOs to insert in an explanatory document accompanying the proposal to amend the present DA&ID CCM, the following explanatory remarks on Article 8(6),

“The application of allocation constraints on one or more Hansa bidding zone borders (BZBs) will in most cases have an impact on the whole of CCR Hansa.

In view of such likely impacts, and principles of transparency and reliability of information, ref. to e.g. Article 3(f) of the CACM Regulation, Hansa TSOs, planning on allocation constraints, are to inform market participants, other Hansa TSOs (not planning the allocation constraints), and all Hansa NRAs, on the plans for application of allocation constraints on Hansa BZBs according to Article 8(6).

If the relevant Hansa TSOs fail to follow this information procedure within the set timeline, the application of the allocation constraints in question may be deemed non-valid.

“Detailed descriptions and justifications” to accompany the information on allocation constraints refers to the substantial requirements for the relevant allocation constraint(s), referred to in Article 8(2) to (5), ref. to Article 8(1)(a) to (d), in the DA&ID CCM, and in Article 23(3)(a) or (b) of the CACM Regulation. Thus, the criteria, “economic surplus for single day-ahead or intraday coupling”, within Article 23(3)(b) of the CACM Regulation, also refers to the definition thereof, in Article 2(46) of the CACM Regulation.”

V. Conclusion

The Hansa NRAs have assessed, consulted, closely cooperated and coordinated to reach the agreement that the Hansa NRAs will request the Hansa TSO to amend the present Hansa DA&ID CCM, cf. Hansa TSOs’ amendment proposal of 21 September 2018, as approved by Hansa NRAs on 16 December 2018, pursuant to Article 9(12), and Article 9(13), 1st subparagraph, of CACM GL.

In follow-up of the actual request for amendment, the Hansa TSOs’ shall for the development of an amendment proposal on the present Hansa DA&ID CCM take into account the Hansa NRAs’ assessments on the substance of the requested amendment proposal, being stated above.

In terms of procedures and timeline, the Hansa NRAs formally request the Hansa TSOs to develop and submit for the Hansa NRAs an amendment proposal within the timeline of two months pursuant to Article 9(12), 1st subparagraph, of CACM GL. And within those very same two months, the Hansa TSOs are to submit a draft amendment proposal for consultation, lasting a period of not less than one month, pursuant to Article 9(13), 2nd subparagraph, and Article 20(2), 2nd subparagraph, in conjunction with Article 12(1), 3rd subparagraph, of CACM GL.

This is because, the most strict requirements for procedures and timeline, following from Article 9(12), in conjunction with Article 9(13), of CACM GL, formally apply for the actual request for amendment.

In the respect of the development of an amendment proposal, the Hansa NRAs request the Hansa TSOs to submit an amendment proposal on the DA&ID CCM in two versions,

- a version, showing track-changes in the respect of the actual requests for amendments, and
- a “clean” version, not showing track-changes in the respect of the actual requests for amendments.

In the respect of a draft amendment proposal to be submitted for consultation pursuant to Article 12 of CACM GL, the Hansa NRAs request the Hansa TSOs,

- To provide guidance for consultation parties, stakeholders etc., that solely comments on the requested amendments of the present Hansa DA&ID CCM, ref. to the track-changes version, shall be taken into account. Thus, any comments on provisions within the present Hansa DA&ID CCM, not being subject for the actual requests for amendments, are not be taken into account.
- To submit a consultation on a draft amendment proposal specifically and directly for the certified TSO, Baltic Cable.

Upon the receipt of the Hansa TSOs' amendment proposal on the present Hansa DA&ID CCM, Hansa NRAs are to decide, either on an approval of the proposal, or on a request of the amendment of its own of that proposal, within two months pursuant to Article 9(12), 2nd subparagraph, of CACM GL.

The Hansa NRAs final approval of the amendment proposal on the present Hansa DA&ID CCM will imply that the Hansa NRAs also confirm the Hansa NRAs' previous approval on 16 December 2018, of the request by the Hansa TSOs of 21 September 2018 to apply the CNTC approach in CCR Hansa, pursuant to Article 20(7) of CACM GL.

The Hansa NRAs have agreed to inform their respective TSOs on the request for amendment of the present Hansa DA&ID CCM on the basis of this agreement by 4 September 2020.