CCR Hansa CACM CCM – RfA and the proposed changes

This document describes the changes made to the CCR Hansa CACM CCM based on the CCR Hansa NRAs’ request for amendments.

| # | Article no | NRA comment | Amendments |
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| 1 | General | The CCM proposal consists of three documents, one legal proposal, one supporting document and a request for Hansa CCR to be allowed to apply the Coordinated Net Transmission Capacity (“CNTC”) approach as CCM.  The Hansa NRAs would like to point out that we will only approve the legal document and the request to apply CNTC, thus the legal document should be a stand-alone product with no references to the supporting document. | The CCM legal document has been cleared for any references to the explanatory document and to the note re. CCR Hansa request to apply CNTC.  The note: the request to apply CNTC has been cleared for any references to the legal and explanatory document for the CCM. |
| 2 | Overall | Hansa NRAs have concerns regarding the justification of using CNTC instead of flow-based according to article 20(7) of CACM GL. Hansa NRAs would prefer the justification of using CNTC instead of flow-based CCM to include calculations on how flow-based is not yet more efficient for Hansa CCR. This could for example be done by taking the mathematical parameters in the flow-based approach (PTDF matrices and RAMs for each CNE), and prove that it will not give a different result than CNTC, when there are no internal CNEs included and all the cross-zonal CNEs are radial. | A new and more detailed example has been added to the note re. the request to apply CNTC.  The CCM explanatory note now also includes a better description of the AC border between DK1-DE and why this line is considered to be a radial interconnector. |
| 3 | Overall | The description of required methodologies and parameters should be improved and completed. In general, Hansa TSOs should include all required methodologies and parameters from Art. 21(a), 21(b), 21(c), 21(2) and 21(3) of CACM GL. Some of the methodologies and parameters have been included, but not all. There should be a precise description of all in the legal proposal. The sole description of methods in the supporting document is not sufficient. NRAs’ comments to each individual requirement follow below. | The CCR Hansa WG has read through the legal requirements in CACM and has added several new articles to comply with all of CACM.   * Article 3: Rules for calculating cross-zonal capacity. * Article 5: Rules for avoiding undue discrimination between internal and cross-zonal exchanges. * Article 17: Rules for Sharing the Power Flow Capabilities of Critical Network Elements.   The content in the article was part of the original document. However, with the new article, the requirements from CACM have been written more explicitly. |
| 4 | Overall | Furthermore, it has to be stated explicitly in the Whereas of the CCM proposal which implications Advanced Hybrid Coupling (“AHC”) in neighboring CCRs will have for Hansa CCR, in order to be approved by Hansa NRAs. The implications for Hansa CCR, if neighboring CCRs will use Standard Hybrid Coupling for a limited time-period, would also have to be stated. CCRs cannot legally in their methodologies apply possible restrictions on other CCRs; without it being explicitly approved in the concerned CCR. | The whereas section no. 13 and Article 19 have been rewritten to describe the implications of an implementation of SHC in CCR Core.  When referring to methodologies being developed in CCR Core and Nordic, the wording has been altered so the CCR Hansa CCM do not ask for an approval of the methodologies being developed in CCR Core and Nordic. |
| 5 | Overall | In several occasions the document uses the word “proposal” instead of methodology, e.g. in articles 2, 13 and 14. | The CCM now states “methodology”. |
| 6 | Article 2 of the CCM proposal “Definitions” | The definition of Advanced Hybrid Coupling explains only the influence of HVDC lines on the AC network flows. It is not explained how AHC takes AC lines (e.g. DK1-DE/LU) into account. Hansa NRAs request Hansa TSOs to specify this further | The definition of AHC has been extended to explicitly mention that AHC can be used to represent the DK1-DE border, as this can be considered a radial line. |
| 7 | Article 4 of the CCM proposal, CACM GL art. 22 “Methodology for determining the reliability margin” | The methodology for determining the reliability margin would benefit from moving some of the explanation from the explanatory document to the legal document, in order to make it more clear what the methodology is about. | The methodology in Article 6 has been broadened with more explanation. |
| 8 | Article 4 of the CCM proposal, CACM GL art. 22 “Methodology for determining the reliability margin” | The methodology is lacking the percentile to be applied for derivation of the reliability margin value from the convoluted probability distribution. | Article 6 now states that a 90th percentile will be used. |
| 9 | Article 3, 5(1-4) and 8 of the CCM proposal “Mathematical description” and “operational security limits” and CACM GL art 23(1-2) | Operational security limits are mentioned, but no such limits are included in the mathematical description on how to calculate the capacities. Furthermore, it is mentioned that “Thermal limits of the CCR Hansa interconnectors are considered in the TTC calculation process”. The proposal should be amended, so that it is clear how the TTC is set for both DC- and AC-borders, and how it takes into account the operational security limits. | The mathematical description for the calculation of day-ahead and intraday capacity for the AC border in Articles 4 and 12 now includes a description of the TTC calculation.  Article 7 has been updated with a description of TTC. |
| 10 | Article 3, 5(1-4) and 8 of the CCM proposal “Mathematical description” and “operational security limits” and CACM GL art 23(1-2) | If the CCM is going to use different operational security limits than the ones used in system operation, the methodology for calculating the operational security limits has to be included in the CCM. Otherwise a reference to the relevant articles in SOGL should be made. | Article 7 has been updated to fulfil this requirement. |
| 11 | Article 5(5-7) of the CCM proposal “allocation constraints” and CACM GL art. 23(3) | The allocation constraints (“ALCs”) that TSOs want to apply according to CACM GL article 23(3) need to be explained and justified within the methodology itself. The list of possible ALCs to be applied in the methodology should be exhaustive, i.e. ALCs which are not in the methodology cannot be applied. NRAs have no legal way of approving or rejecting the use of ALCs on the basis of a justification which TSOs communicate to the market individually and outside of the CCM proposal. | Allocation constraints are now described in Article 8, and the article lists all possible remedial actions relevant for CCR Hansa. |
| 12 | Article 5(5-7) of the CCM proposal “allocation constraints” and CACM GL art. 23(3) | TSOs applying ALCs should regularly submit information to NRAs showing to what extent these allocation constraints have limited the market, including the shadow prices of the ALCs. | Article 8 specifies a requirement for the TSOs to submit information to the NRAs. Hwever, it is still being discussed within the WG if the TSOs can deliver the shadow price, as this data is only recorded by the NRAs. |
| 13 | Article 6 of the CCM proposal “Methodology for determining generation shift keys” and CACM GL art. 24 | From the CCM proposal it is not clear whether any generation shift key (“GSK”) is applied on the AC connection. In case a GSK is applied, it is not stated how this GSK is determined, modelled and used. GSKs are based on the input and output from nodes inside the bidding zones, and all these nodes are included in the CCM proposals of Nordic and Core CCRs. If no GSKs are to be applied in Hansa CCR, this should be stated explicitly in the legal document. | Article 9 now clearly states that GSKs used in CCR Hansa are being developed in CCR Nordic and CCR Core. |
| 14 | Article 7 of the CCM proposal, CACM GL art. 25 “Methodology for remedial actions in capacity calculation” and CACM GL art. 21 (1) (b) (iv) “rules on the adjustment of power flows of cross-zonal capacity due to remedial actions” | The legal proposal is lacking an applicable methodology for remedial actions (“RAs”). Article 7 mentioning of “RAs such as phase shifters” does not give any clear picture of which RAs will be applied. The mentioning of “if available, be considered in the determination of the TTC value” does not give a clear picture on which criteria and/or analyses will be made in order to determine whether RAs will be used or not in order to increase the available capacities. Furthermore the methodology has to, but does not currently mention, how the use of RAs will be coordinated between the TSOs in Hansa CCR (CACM GL art. 25(2-3)) | Article 10 with the methodology for determining remedial actions has been broadened.  The CCM clearly states that all non-costly remedial actions shall be used in the determination of the TTC value.  In addition, it is necessary to add that costly remedial actions will be used for Kriegers Flak under certain conditions. |
| 15 | Article 7 of the CCM proposal, CACM GL art. 25 “Methodology for remedial actions in capacity calculation” and CACM GL art. 21 (1) (b) (iv) “rules on the adjustment of power flows of cross-zonal capacity due to remedial actions” | Hansa NRAs understand that the RAs available in Hansa CCR are limited, as most RAs are situated in and connected to the AC-networks, which are included in the flow-based methodologies of Nordic and Core CCR. If this is the case; it is necessary to write and justify this explicitly in the CCM proposal. | This has been incorporated together with the above changes to Article 10. |
| 16 | Article 7 of the CCM proposal, CACM GL art. 25 “Methodology for remedial actions in capacity calculation” and CACM GL art. 21 (1) (b) (iv) “rules on the adjustment of power flows of cross-zonal capacity due to remedial actions” | Furthermore, it remains unclear from the CCM proposal, how it will be managed if simultaneous remedial actions on both sides of the Hansa bidding-zone borders are beneficial for the capacity and economically efficient. As Nordic and Core CCRs, to NRAs’ understanding, have not planned any coordination between each other on remedial actions, Hansa CCR will need to facilitate this. | The use of remedial action in neighbouring CCRs and the effect on CCR Hansa have been further elaborated in the explanatory document Chapter 4.7 |
| 17 | Article 8 of the CCM proposal “Mathematical description of the applied approach“ | Krieger’s Flak DC-line does not seem to be covered by the current mathematical description. Any deviances for Krieger’s Flak from the other DC-lines will have to be included and justified in the proposal. | The mathematical description for Kriegers Flak has been added to Articles 4 and 12. |
| 18 | Article 11 of the CCM proposal “Methodology for the validation of cross-zonal capacity“ | Hansa NRAs find it valuable to be added, that if the cross-zonal capacity on a border is regularly changed in the same direction during the validation (cf. CACM art 26,), the capacity calculation process would have to be revised. As this would imply that something important is not captured. | A new requirement to Article 16 has been added, so in case capacities are regularly updated by TSOs, the TSOs shall evaluate the capacity calculation process and the methodology. |
| 19 | Article 11 of the CCM proposal “Methodology for the validation of cross-zonal capacity“ | TSOs should include a rule for splitting the correction of cross-zone capacity between the different bidding zone borders according to Art. 26 (2) CACM. | Article 16(2) explicitly states that this is not applicable to CCR Hansa. |
| 20 | Article 11 of the CCM proposal “Methodology for the validation of cross-zonal capacity“ | Each TSO should include explanation/justification in the capacity validation result, when sending this to the CCC and to the other TSOs of CCR Hansa. As this information would be necessary, should the revision of the capacity calculation process be needed. | This requirement has been added to Article 16. |
| 21 | CACMGL art. 21 (1) (b) (ii): “rules for avoiding undue discrimination between internal and cross-zonal exchanges to ensure compliance with point 1.7 of Annex I to Regulation (EC) No 714/2009” | The legal proposal is missing the rules for avoiding undue discrimination. These should be included directly in the legal proposal. The text included in point 4.1.4 of the explanatory document, does not constitute sufficient rules on how to avoid undue discrimination, as it is very implicitly explained. It is also unclear to Hansa NRAs which rule makes certain that there will not be any undue discrimination against the cross-zonal exchanges in Hansa CCR coming from Nordic and Core | The rules for undue discrimination have been added to Article 5. |
| 22 | CACM GL art. 21 (1) (b) (iii): “rules for taking into account, where appropriate, previously allocated cross-zonal capacity” | The legal proposal is missing the rules for taking into account previously allocated cross-zonal capacity. These rules should be included in the legal proposal. They could include which previously allocated capacity will be taken into account (e.g. PTRs, Krieger’s Flak). | The rules are now specified in Article 11 for the day-ahead and in Article 13 for intraday. |
| 23 | CACM GL art. 21 (1) (b) (vi-vii): “rules for efficiently sharing power flow capabilities of critical network elements” | The legal proposal is missing the rules for efficiently sharing of power flow capabilities of critical network elements. These rules have to be included, even if the CCM proposal implies that no internal critical network elements are to be considered, as this would also be a rule. | The rules are now specified in Article 17. |
| 24 | Article 13 of the CCM proposal “Implementation” | The implementation timeline should be expanded to better explain the different steps of the stepwise implementation of CCM in Hansa. | The implementation timeline has been expanded in Article 20 and is also described in more detail in the whereas no. 13. |
| 25 | Article 13 of the CCM proposal “Implementation” | The expected time that the different implementation steps of the Hansa CCM will be reached should be stated. The timeline should not focus on the adjacent CCR’s implementation of CCM, this can be included in the explanatory document. | This has been incorporated in Article 20. |
| 26 | On the release time of capacity for the intraday market | Hansa NRAs find that it has to be stated in the CCM proposal that Hansa TSOs commit to make a publication to the market about what time above-zero intraday capacities will be released. | This has been added as an obligation for the CCR Hansa TSOs in Article 13. |
| 27 | On the release time of capacity for the intraday market | If the release time deviates from the ACER decision of 15.00 D-1 CET, the TSO publication has to include a thorough justification, as capacities nevertheless have to be released to the market as early as possible and without undue delay. The objectives of Art. 3 of Regulation 2015/1222 have to be fulfilled. | This has been added as an obligation for the CCR Hansa TSOs in Article 13. |