

# Assessment of comments on EU HAR annex consultation and TSO's proposal

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## 1. Introduction

The consultation of the EU HAR was held from 2<sup>nd</sup> until 31<sup>st</sup> of March 2015. Next to the consultation of the EU HAR main document, border specific annexes and regional specific annexes were consulted.

The Spanish and French TSOs (REE and RTE) jointly provided Annex 6.

## 2. Parties' comments

1. One respondent have requested the harmonisation of the sending of Rights Documents at 13:00 CET D-2 instead of 16:00 CET D-2.
2. One respondent proposed to move the Long Term Firmness Deadline at the time of the sending of Rights Document. TSOs will include in the Annex 6 the text proposed.
3. One respondent suggested the cap to compensation should be calculated considering the whole year and in all directions.

## 3. TSO's assessment

### 1. Sending of Rights document

Due to the current operational process, the sending of Rights Document at 13:00 is not feasible to end the NTC calculation based on weekly planned outages which is published at the latest at 14:00 on Thursdays, as regulated in the Spanish Operational Procedure 3.4, article 3.2.

### 2. Long Term Firmness Deadline

TSOs accepted the proposal to set the Long Term Firmness Deadline at the sending of Rights Document as no operational/methodology change appeared and the NC FCA is not yet entered into force.

It should be noted that, in line with the current draft of the NC FCA, TSOs are trying to harmonize as much as possible the Long Term Firmness Deadline (LTFD) principles. According to ACER's recommendations (Amendment 3.2) and NC FCA, the LTFD is set at the Nomination Deadline. Furthermore, REE and RTE are currently working on a new coordinated capacity calculation methodology as requested in the CACM guidelines (Article 19.2). This new methodology will optimize, due to greater coordination, the calculation of capacity, making it more efficient. The NTC results should be known closer to D-1, therefore the LTFD will have to be adjusted accordingly. This latter shall be in place in 2017 as foreseen in the CACM.

### **3. Yearly cap**

The calculation of the caps is clearly defined in the FCA NC and explained in ENTSO-E explanatory document referred to above. The annex is in line with FCA NC therefore.