

Summary of responses on EU HAR annex consultation

Concerning annex 7 (DE-DK)

1. Introduction

The consultation of the EU HAR was held from 2nd until 31st of March 2015. Next to the consultation of the EU HAR main document, border specific annexes and regional specific annexes were consulted. Energinet.dk, 50Hertz and TenneT GmbH jointly provided annex 7.

2. Comments on DE-DK annex

Two comments were received on the border specific annex, both from one market participant.

The respondent mentioned that transmission losses in article 2 (3) of the annex should not be taken into account when calculating the price of remuneration for non-nominated PTRs and FTR Options, as it would decrease the transparency of the price. However, the inclusion of transmission losses was done based on a request by ACER as well as on the draft GL FCA so the request cannot be accepted.

In the second comment the respondent proposed that all long term transmission rights should be as firm as possible and that there should be no cap on remuneration for curtailments to ensure system security. TSOs want to clarify that in the border specific annex the TSOs tried to implement the highest firmness regime possible.

For the reasons stated above, no changes were made in the border specific annex for DE-DK.