



Report on the public consultation on Core CCR TSOs' Fallback Procedures Proposal in accordance with Article 44 of the Commission Regulation (EU) 2015/1222

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1. Introduction

This report on the public consultation is written to provide information and justification for including or not the views resulting from the public consultation on the Core CCR TSOs' Fallback Procedures Proposal (hereafter "Fallback Procedures Proposal") as requested in Article 44 of the Commission Regulation (EU) 2015/1222 (hereafter "CACM Regulation").

In accordance with Article 44 of the CACM Regulation Core CCR TSOs have elaborated the Fallback Procedures Proposal which was then consulted upon between 27 March and 27 April 2017. Six comments from three respondents were received and duly considered by the Core CCR TSOs.

This document provides an overview of the received comments, the Core CCR TSO's assessment of these comments and whether or how the relevant parts of the Core CCR TSOs' Fallback Procedures Proposal were amended based on these comments. The full list of comments received is also attached to this document.

The public consultation process is anonymous, therefore the identity of respondents will not be disclosed with the publication of this consultation's outcome. Please note that it was however disclosed to the Core CCR national regulatory authorities together with the complete responses.

The Core CCR TSOs wish to clarify that the contents of this document are intended to summarize the results obtained in the public consultation. This also means that the report should not be interpreted as the Core CCR TSOs' position on the concerned topics. The Core CCR TSOs duly assessed and took into account where possible the feedback received during public consultation.

2. Assessment of stakeholders' comments

General comments

One general comment was raised, whether Core CCR TSOs also consider "correction cycles" for intraday matching on the profiles (borders). Regarding to this comment, the Core CCR TSOs would like to address that the Fallback Procedures Proposal document is designed for the day-ahead timeframe according to Article 44 of the CACM Regulation and not for the intraday timeframe.

Article 2

One comment was raised considering the 'allocation platform operator' being one vehicle of cooperation among Core CCR TSOs, through which the Core CCR TSOs organize the attribution of cross zonal capacity through shadow auctions. Specifically, two questions have been addressed:

1. What will be the fallback solution on borders among the Core region and other regions?
The Fallback Procedures Proposal apply to the Core CCR bidding zone borders and as this CCR consists of bidding zone borders. The Core CCR proposal cannot consider borders that are allocated to other CCRs. A clarification was added to the Article 2 of the Fallback Procedures Proposal.
2. Could it be possible to have more than one vehicle among Core CCR TSOs?
Core TSOs believe that having one platform with harmonized process for allocating cross zonal capacities through shadow auctions would be beneficial for market participants subject to operational security and cost efficiency point of view.

Article 4

Four comments were raised considering the Fallback Procedures itself, specified in Article 4.

1. The first comment questions whether shadow auctions in case of a fallback apply only to the borders of the bidding zone where the problem has originated or whether such shadow auction would also take place at borders of other bidding zones. A detailed description on timings or partial coupling will be provided at a later stage, but is not part of this Fallback Procedures Proposal.
2. The second comment suggests to coordinate the Core CCR Fallback Proposal with the fallback proposals of adjacent regions. This Fallback Procedures Proposal aims on harmonization within the Core CCR in first instance. Where possible the shadow allocation rules could be harmonized across CCRs.
3. The third comment suggests to keep NEMOs on one bidding zone coupled in case of fallback procedures are chosen to ensure one single price per bidding zone and market time unit as well as non-extreme clearing prices and best match for the market parties. This questions is also out of scope of this proposal which solely refers to the allocation of cross-zonal capacities.
4. The fourth comment suggests to clarify the precise moment when the fallback would be triggered and when any post process jointly or separately per Core CCR NEMOs must be completed. Indeed, the Core CCR TSOs will specify in detail the timings and deadlines for starting Fallback Procedures in case of the single day-ahead coupling process including any back-up methodology defined according to Article 36 of the CACM Regulation such as partial coupling where applicable is unable to produce results for at least one bidding zone within the Core CCR. However, the detailed description will not be part of the all Core CCR TSOs Fallback Procedures Proposal, but will be part of the later-on provided detailed process description to be elaborated by Core CCR TSOs in coordination with Core CCR NEMOs.

Full list of comments

Below is the full list of comments received via the public consultation.

Article	Comment
General	I would like to kindly ask whether you contemplate "correction cycles" for intraday matching on the profiles (borders)? Fallback procedures are not important for us when there is (exists) properly working cross-border intraday.
2.1c	<p>'Allocation platform operator' means one vehicle of cooperation among TSOs, through which the Core TSOs organize the attribution of Cross Zonal Capacity through Shadow Auctions. The allocation platform operator will act on behalf of the Core TSOs for this purpose;</p> <p>Questions:</p> <p>1) What will be a solution (Fallback Procedures) on borders among Core region and other regions?</p> <p>2) Could it be possible to have more than one vehicle among Core TSOs? For example: Separated shadow auction on each border will be organized by one of the dedicated TSO.</p>
4	<p>The Core TSOs Fallback Proposal and the opportunity to comment on it is appreciated. We see it as a very high-level proposal, and would suggest to include the following principles and clarifications, which are key from our perspective:</p> <p>1) The solution the Core TSOs Fallback Proposal offers in case Single Day Ahead Coupling fails to deliver in time for one/more BZ inside the Core Region are Shadow Auctions. However, it is unclear from our perspective, whether such auctions only apply to the borders of the BZ where the problem originated, or whether such shadow auctions would also take place at borders of other BZs</p> <p>2) We strongly suggest that the Core TSOs Fallback Proposal is coordinated with the fallback proposals of adjacent regions (e.g. the Hansa, Baltics, Nordics).</p> <p>3) To ensure one single price per BZ and Market Time Unit, non-extreme clearing prices and best match for the market parties, we propose that a key principle should be that NEMOs within one BZ stay coupled also in a fallback situation.</p> <p>4) The Core TSOs Fallback Proposal should clarify the precise moment when fallback would be triggered, and when that and any post process jointly or separately per NEMO must be completed.</p>