

ACER Decision on the amendment of the determination of capacity calculation regions: Annex III

For information only

Evaluation of responses to the public consultation on the proposal for amendment of the determination of capacity calculation regions

1 INTRODUCTION

On 2 July 2025, The European Network of Transmission System Operators of Electricity ('ENTSO-E'), submitted a proposal for amendment of the Determination of capacity calculation regions ('CCRs') ('the Proposal') on behalf of all transmission system operators ('TSOs') to ACER for approval.

In order to take an informed decision and in accordance with Article 14(1) of Regulation (EU) 2019/942, ACER launched a public consultation on 24 July 2025 inviting all interested stakeholders, including regulatory authorities and TSOs, to provide any comments on the Proposal. The closing date for comments was 3 September 2025.

This document provides a summary of responses to ACER's public consultation.

2 PURPOSE AND OBJECTIVES

Commission Regulation (EU) 2015/1222 ('the CACM Regulation') defines capacity calculation regions ('CCRs') as geographic areas in which coordinated capacity calculation is applied. Article 15(1) of the CACM Regulation requires all TSOs to jointly develop a common proposal regarding the determination of CCRs. ACER has approved such proposal of all TSOs in its Decision 04/2021 of 7 May 2021, as amended by Decision 08/2023 of 31 March 2023 and by Decision 04/2024 of 19 March 2024.

The TSOs' amendment proposal of 2 July 2025 included:

- inclusion of bidding zone borders between EU TSOs in the Member States neighbouring the Energy Community Contracting Parties and the Energy Community Contracting Parties TSOs; and
- further merger of the CCR Core and the CCR Italy North into the CCR Central Europe.

3 LIST OF RESPONDENTS

By the end of the consultation period, ACER received comments from eight respondents.

Organisation	Country	Type
Transelectrica	RO	TSO
Augstsprieguma Tīkls AS (AST)	LV	TSO
Swissgrid AG	CH	TSO
Oesterreichs Energie	AT	Association
Energy Traders Europe	NL	Association
Eurelectric	BE	Association
EDF	FR	Association
WhyNotEasy AG i.Gr.	DE	Association

4 RESPONSES

ACER has carefully considered all stakeholders' comments in assessing the proposed amendment of the CCR methodology and finalising its position. This evaluation paper summarises all the respondents' comments and how these were considered by ACER. The table below is organised according to the consultation questions and provides the respective views from the respondents, as well as a response from ACER clarifying how their comments were considered in the present Decision.

Respondents' views		ACER views
<i>Question 1: Do you have any comments regarding the proposed merger of Core CCR and Italy North CCR into the Central Europe CCR for intraday capacity calculation, as well as for ROSC, RDCT and RDCT CS? Please explain..</i>		
Swissgrid AG	Swissgrid supports the ongoing merger activities in the CE CCR, including for the intraday timeframe as well as for the methodologies for ROSC, RDCT and CS. We would, however, like to emphasize the importance of the coordination with non-EU TSOs, including Switzerland, in the capacity calculation processes in general. Such coordination enhances system security, as cross-border flows have a direct impact on the European grid and integration of non-EU TSOs provides more cross-border trading opportunities, thereby increasing social welfare. Switzerland is integrated, by way of the Swiss consideration package (Swiss Northern Borders), in the Core CCR and in the Italy North CCR as a technical counterparty for a number of processes, and will, with respect to day-ahead capacity calculation, be integrated in the Central Europe CCR as an integrated technical counterparty (iTCP), with NTC extraction for CH borders conducted from the commonly calculated CE Flow-Based domain. We acknowledge that deeper integration of Switzerland into CCR related processes, such as FB implicit allocation, depends on the further evolution of the political process regarding the EU-Swiss Electricity Agreement. Nevertheless, we would like to highlight the importance of explicitly recognizing the existence and role of (integrated) technical counterparties within the Determination of CCRs methodology. Recognizing these entities in the Determination of CCRs methodology would align the regulatory framework with operational realities and would enhance transparency and legal certainty for all stakeholders, including TSOs, NRAs, and market participants.	ACER acknowledges the provided views and welcomes future integration of the Swiss borders into the capacity calculation process. ACER expects that the further development of the CCR Central Europe will largely facilitate such an integration.
Oesterreichs Energie	Firstly, we welcome the idea of establishing larger CCRs, as we believe this will contribute to an even more stable and well-functioning European electricity system and market. The merging of Core and North Italy, as well as	ACER acknowledges Oesterreichs Energie position. With regard the bidding zones, ACER agrees that they are a core element of the

Respondents' views		ACER views
	the expansion of the South Eastern Europe region, appear to be steps in the right direction. Additionally, we would like to take this opportunity to suggest that similar benefits might be achieved not only by merging CCRs but also by considering the merging of bidding zones. We believe that such an approach could further enhance the efficiency and stability of the European electricity market.	European market design. It is however not under the scope of the current decision
Energy Traders Europe	We welcome the Roadmap for a full merger of Italy North into the CE CCR. Integration into larger regions brings additional benefits in the form of increased grid security and cross-border capacities. Furthermore, we would like to mention our support for integrating „buffer regions“ such as Hansa into larger areas, as full later harmonisation was an intended goal when the concept of CCR was introduced as an interim stage.	ACER takes into consideration the position of Energy Traders Europe.
Eurelectric	Eurelectric supports, in principle, the proposal to pursue the merger of the Core and Italy North CCRs into the Central Europe CCR, although we continue to regret the lack of an impact assessment regarding the potential negative effects of such an integration. Eurelectric also endorses the proposed step-by-step approach and the decision to maintain priority on implementing the already approved IDCC, ROSC, RDCT and CS methodologies. It is essential that this prioritization is not undermined by the initiation of work on additional methodologies.	ACER agrees with systematic and analytic approach in defining the merger steps of Core and Italy North considering ongoing processes. ACER and the TSOs are of the opinion that all relevant potential impacts of the integration have been considered. As ACER agreed with the CE TSOs view that process-wise it was premature to include LT CCM process in the CE framework, it has not been considered in this amendment.

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	Furthermore, Eurelectric shares the TSOs' view that it is premature to revise the CCR proposal for LTCC. This is particularly relevant given that the target model for long-term markets is still under discussion, and a revision of the FCA Regulation is expected in the coming months. The development of a CE LTCC solution will be highly dependent on this regulatory review.	
EDF	While EDF continues to deplore the absence of assessment of the potential adverse effects of the merger of Core and Italy North CCRs into the Central Europe CCR, we generally support this shift, including its new extension to the intraday timeframe, as well as for the methodologies for Regional operational security coordination, coordinated redispatching and countertrading and redispatching and countertrading cost sharing methodology. EDF supports, in principle, the objective of achieving this merger as quickly as possible while ensuring to avoid any negative impact on the existing CORE capacity calculation process and the EU SIDC mechanisms. EDF also endorses the proposed step by step approach as well as the proposal to keep the priority on the implementation of the already approved IDCC, ROSC, and CS methodologies ensuring more specifically that it is not hindered by additional work. As such, EDF also shares the view of TSOs when they consider that it is premature to amend the CCR proposal for LTCC. All the more since the target model for the long-term markets is currently under discussion and a review of the FCA regulation may be proposed in the following months. The CE LTCC solution will be highly dependent on this review and we support the proposal to delay the merger of ITN and CE for the LTCC methodology to avoid any sunk cost.	ACER agrees with systematic and analytic approach in defining the merger steps of Core and Italy North considering ongoing processes. As ACER agreed with the CE TSOs view that process-wise it was premature to include LT CCM process in the CE framework, it has not been considered in this amendment.

Respondents' views		ACER views
WhyNotEasy AG i.Gr.	What is the main issue in 50 Hz regulations across the continent?	The question is not considered relevant for the process.

Question 2: Do you have any comments regarding the proposed determination of CCRs which incorporate the bidding zone borders and the TSOs of the Energy Community Contracting Parties (EnC CPs) and neighbouring EU countries? Please explain.

CNTEE Transelectrica S.A	The current proposal would spread Romania's five borders across four different CCRs, which makes coordination between TSOs difficult, creates uncertainty regarding the cross-zonal capacity available for trade, jeopardises the security of the Romanian power system and of the Continental European network. Establishing a unified Balkans CCR, proposed by ACER, is more beneficial than the proposed split into ECE and SEE. This configuration better reflects the operational, historical, and technical realities of the region. 1. Regional cooperation: For over two decades, all TSOs from the Balkans have carried out joint outage planning. This collaboration demonstrates that CCR-level tasks can be executed reliably and efficiently at the scale of the Balkans. Such continuity should be preserved and formalised under a unified CCR framework. 2. Coordination of commercial exchanges: TSOs in SEE already exchange monthly grid models and forecasted net positions, resulting in a regional common grid model. A unified CCR covering the Balkans is necessary for implementing an accurate flow-based capacity calculation, capturing all relevant transit corridors between South-East Europe, Romania, and Central Europe. In contrast, dividing the region into multiple CCRs would hinder effective netting of cross-border flows and introduce inaccuracies in meeting the 70% minimum capacity target. Currently, each CCR applies different data sets and rules to build its day-ahead CGM, creating mismatches and potential	Given that ACER was aware of these shortcomings in the TSOs' proposal, ACER initially presented a proposal to merge CCR SEE and CCR ECE into a single region (the so-called "Balkan CCR"). Following the discussions held during the working meetings, another alternative has been found, potentially less burdensome for intermediate implementation. The final proposal of amendment to the CCR determination concerning the RO-EMS bidding zone border, was finally supported by all TSOs, including Transelectrica.
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Respondents' views		ACER views
	security concerns-particularly for Romania. A Balkan CCR will harmonise this process and increase reliability. 3. Resource efficiency: Managing four separate CCRs across Romania's borders would demand disproportionate human and technical effort. A single CCR will reduce redundancies, ensure consistency, and streamline operations. 4. Serbia-Kosovo border: Already coordinated within SEE CCR. Its continued inclusion within a Balkans CCR remains feasible and justified.	
Swissgrid AG	Swissgrid supports the proposal to incorporate the capacity calculation regions of the Energy Community Contracting Parties and the neighbouring countries. However, as elaborated in the above comment, we would like to highlight the importance of coordinating with all non-EU TSOs, including Switzerland, and explicitly recognizing the existence and role of (integrated) technical counterparties within the Determination of CCRs methodology. Recognizing these entities in the Determination of CCRs methodology would align the regulatory framework with operational realities and would enhance transparency and legal certainty for all stakeholders, including TSOs, NRAs, and market participants.	ACER acknowledges the provided views and welcomes future integration of the Swiss borders into the capacity calculation process.
Energy Traders Europe	We support the proposal to include the capacity calculation regions of the Energy Community Contracting Parties (although newly established CCRs will only exist during the interim period until full integration into the CE CCR) and neighbouring countries. Including non-EU TSOs in capacity calculation improves system security, as these flows directly influence the European grid and create more cross-border trading opportunities, thereby increasing social welfare.	ACER acknowledges the provided views and welcomes future integration of the Swiss borders into the capacity calculation process

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	We would further like to reiterate our support for coordinating with TSOs from Switzerland and the UK. While we recognise the political complexities involved, further coordination in the future is essential for efficient cross-border electricity trading and to ensure system security.	
Eurelectric	Eurelectric welcomes ACER's consultation on the definition of Capacity Calculation Regions (CCRs), which reflects the proposal submitted by the TSOs and on which Eurelectric provided feedback last June (see our detailed response in the appendix to the explanatory note). As a result, our position remains broadly consistent: Eurelectric supports the integration of the Energy Community (EnC) into the EU framework, recognizing its potential to enhance coordination and system reliability. However, Eurelectric emphasizes the importance of a gradual and well-managed integration process, underpinned by prior alignment with EU legislation, and would have welcomed a detailed quantitative impact assessment to fully assess the actual benefits of such integration in terms of system security and to support a well-informed opinion. During the 40th meeting of the Market European Stakeholder Committee (MESC), Eurelectric understood that ACER may be considering an alternative approach—namely, merging the ECE and SEE regions to encompass the entire Balkan area. This option was neither presented nor evaluated in the consultation documents. Eurelectric therefore seeks clarification on whether this alternative remains under consideration, and the rationale behind it. More broadly, Eurelectric encourages ACER to ensure that its consultations include	ACER agrees with the comment regarding the transposition of EU legislation into the national framework of EnC Contracting Parties prior to the formal establishment of new CCRs. This approach is aligned with the overall transposition process led by the EnC Secretariat and the European Commission, which requires that the transposition be completed by all EnC Contracting Parties forming a CCR before that CCR can become fully legally defined in line with EU CACM and EnC CACM. ACER has provided an explanation of this requirement in the current Decision. During the process of adopting a decision on the amendment of the CCR determination, ACER presented an alternative of merging CCR SEE and CCR ECE into a single region. Following the discussions held during the working meetings, another alternative has been found, potentially less burdensome for intermediate implementation. The final proposal of amendment to the CCR

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	its own proposals, and not only those originating from TSOs, which are already subject to consultation via ENTSO-E.	determination concerning the RO-EMS bidding zone border, was finally supported by all TSOs.
EDF	EDF welcomes the ACER consultation on the determination of CCRs which corresponds to the TSOs proposal on which EDF provided its opinion last June. As a consequence, our answer is quite similar and, from a general standpoint, EDF supports the integration of the Energy Community (EnC) for network security and capacity calculation efficiency but insists on a smooth and careful integration with, in advance, an adequate alignment with EU rules (EDF's extensive answer is in the Appendix of the explanatory note). Nevertheless, during the 40th Market European Stakeholder Committee EDF understood that ACER may have an alternative proposal which is to merge the ECE and SEE together to span over the entire Balkan region. This proposal was not presented nor assessed in the consultation documents and EDF asks whether this option is still open and why. In general, EDF would welcome that ACER's consultations span over its own proposals and not only the TSO proposals which were usually already consulted on by ENTSO-E.	ACER agrees with the comment regarding the transposition of EU legislation into the national framework of EnC Contracting Parties prior to the formal establishment of new CCRs. This approach is aligned with the overall transposition process led by the EnC Secretariat and the European Commission, which requires that the transposition be completed by all EnC Contracting Parties forming a CCR before that CCR can become fully legally defined in line with EU CACM and EnC CACM. ACER has provided an explanation of this requirement in the current Decision. During the process of adopting a decision on the amendment of the CCR determination, ACER presented an alternative of merging CCR SEE and CCR ECE into a single region. Following the discussions held during the working meetings, another alternative has been found, potentially less burdensome for intermediate implementation. The final proposal of amendment to the CCR determination concerning the RO-EMS bidding zone border, was finally supported by all TSOs.

Respondents' views		ACER views
WhyNotEasy AG i.Gr	How is the exchange between the described regions regulated?	The question is not considered relevant for the process.