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Esittelijä / Föredragande / Referendary

Nimi / Namn / Name: Petr Spodniak

Pvm / Datum / Date: 20.10.2025

Ratkaisija / Beslutsfattare / Decision-maker

Nimi / Namn / Name: Simo Nurmi

Pvm / Datum / Date: 20.10.2025

Tämä asiakirja koostuu seuraavista osista:

- Kansilehti (tämä sivu)
- Alkuperäinen asiakirja tai alkuperäiset asiakirjat [Allekirjoitettu asiakirja alkaa seuraavalta sivulta. >](#)

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Asia

Päätös Baltian kapasiteetin laskenta-alueen pitkän aikavälin siirto-oikeuksien osittamismenetelmästä

Asianosainen

Fingrid Oyj

Vireilletulo

13.2.2025

Ratkaisu

Energiavirasto vahvistaa Fingrid Oyj:n noudatettavaksi tämän päätöksen liitteenä olevan menetelmän pitkän aikavälin siirto-oikeuksien osittamisesta Baltian kapasiteetin laskenta-alueella.

Päätös on voimassa toistaiseksi.

Päätöstä on noudatettava muutoksenhausta huolimatta.

Perustelut

Fingridin toimittama ehdotus

- (1) Pitkän aikavälin kapasiteetin jakamista koskevista suuntaviivoista annetun Euroopan komission asetuksen (EU) 2016/1719 (jäljempänä "FCA suuntaviivat") 4 artiklan 12 kohdan mukaan ehtoja ja edellytyksiä tai menetelmiä koskevan ehdotuksen laatimisesta vastaavat siirtoverkonhaltijat voivat ehdottaa muutoksia sääntelyviranomaisille ja virastolle. Ehtojen ja edellytysten tai menetelmien muuttamista koskevista ehdotuksista on järjestettävä kuuleminen 6 artiklassa säädetyn menettelyn mukaisesti, ja ehdotukset on hyväksyttävä samassa artiklassa säädetyn menettelyn mukaisesti.
- (2) Pitkän aikavälin siirto-oikeuksia tarjoavat Baltian kapasiteetin laskenta-alueen siirtoverkonhaltijat – Fingrid Oyj (jäljempänä myös Fingrid), Elering AS (jäljempänä Elering) ja AS Augstsprieguma tikls (jäljempänä AST) – halusivat muuttaa voimassa olevaa FCA suuntaviivojen 16 artiklan mukaista pitkän aikavälin siirto-oikeuksien osittamismenetelmää ja tätä varten he laativat yhteisen menetelmän.
- (3) Fingrid toimitti 13.2.2025 Energiavirastolle vahvistettavaksi ehdotuksen pitkän aikavälin siirto-oikeuksien osittamisesta FCA suuntaviivojen 16 artiklan



mukaisesti. Viimeinen asianomainen sääntelyviranomainen vastaanotti ehdotuksen 18.2.2025. Asianomaiset siirtoverkonhaltijat järjestivät julkisen kuulemisen ehdotuksesta ennen sen toimittamista.

- (4) Fingridin ehdottama menetelmä korvaa aiemmin käytössä olleet kahdenväliset järjestelyt ja yhtenäistää kapasiteetin jakamisen periaatteet Baltian alueella asianomaisten siirto-oikeuksia tarjoavien kantaverkkoyhtiöiden välillä, ja samalla varmistaa järjestelyjen johdonmukaisuuden pitkän aikavälin kapasiteetin laskentamenetelmän kanssa. Tämä tuli mahdolliseksi vasta Baltian alueen irtauduttua Venäjän synkronialueesta vuonna 2025. Ehdotuksessa tarkennetaan myös EE-LV -rajaa koskevaa kapasiteetin jakoa huomioiden reservien vaihdon. Tämän lisäksi FI-EE -rajan siirto-oikeuksien määrät on muutettu ehdotuksessa vastaamaan Estlink-yhteyksien teknisiä rajoitteita siten, että myönnettävät määrät heijastavat enintään sitä sähkönsiirtokapasiteettia, joka olisi käytettävissä tilanteessa, jossa vain toinen kaapeleista on toiminnassa. Käytännössä tämä tarkoittaa enintään 650 MW:n kokonaismäärää, joka vastaa suuremman, Estlink 2 -yhteyden teknistä siirtokapasiteettia.
- (5) FCA suuntaviivojen 4 artiklan 9 kohdan mukaan, jos ehtoja ja edellytyksiä tai menetelmiä koskevan ehdotuksen hyväksyminen edellyttää useamman kuin yhden sääntelyviranomaisten päätöstä, toimivaltaisten sääntelyviranomaisten on kuultava toisiaan, tehtävä tiivistä yhteistyötä ja koordinoitava toimiaan sopimukseen pääsemiseksi. Sääntelyviranomaisten on tehtävä ehdotettuja ehtoja ja edellytyksiä tai menetelmiä koskevat päätökset kuuden kuukauden kuluessa siitä, kun viimeinen asianomainen sääntelyviranomainen on vastaanottanut ehdot ja edellytykset tai menetelmät.

Ehdotuksen käsittely

- (6) FCA suuntaviivojen 4 artiklan 11 kohdan mukaisesti sääntelyviranomaiset voivat pyytää siirtoverkonhaltijoita muuttamaan niiden toimittamia ehdotuksia. Saman kohdan mukaisesti asianomaisella siirtoverkonhaltijalla on täydennyspyynnön saatuaan kaksi kuukautta aikaa toimittaa muutettu ehdotus asianomaiselle sääntelyviranomaiselle. Sääntelyviranomaisten on päätettävä muutetuista ehdoista ja edellytyksistä tai menetelmistä kahden kuukauden kuluessa niiden esittämisestä.
- (7) Energiavirasto sekä asianomaiset Baltian kapasiteetin laskenta-alueen kansalliset sääntelyviranomaiset – The Public Utilities Commission of Latvia (jäljempänä PUC), ja Estonian Competition Authority (jäljempänä ECA) – tulivat ehdotusta arvioituaan yhteiseen tulokseen siitä, että menetelmää täytyy muuttaa ennen kuin se voidaan hyväksyä.
- (8) Energiavirasto sekä muut asianomaiset Baltian kapasiteetin laskenta-alueen kansalliset sääntelyviranomaiset katsoivat, että ehdotus ei sisältänyt riittäviä perusteluja osittamismenetelmän kaavoille ja volyymirajoille, minkä vuoksi sitä tulisi täydentää. Lisäksi sääntelyviranomaiset korostivat, että pitkän aikavälin kapasiteetin osittamistoiminnon tulee ensisijaisesti perustua TSO-TSO -koordinaatioon. Näiden lisäksi sääntelyviranomaiset katsoivat, että menetelmässä tulisi tarkentaa terminologiaa, viittauksia sekä yleistä johdonmukaisuutta.

- (9) Energiavirasto pyysi 24.6.2025 lähettämällään muutospyyntöä Fingridiä muuttamaan ehdotustaan kapasiteetin laskenta-alueen sääntelyviranomaisten yhteisesti sopiman muutospyyntöön mukaisesti.

Fingridin muutettu ehdotus ja sen käsittely

- (10) Fingrid toimitti täydennetyn ehdotuksen Energiavirastolle 18.8.2025 FCA suuntaviivojen mukaisessa aikataulussa, kahden kuukauden kuluessa sääntelyviranomaisten vaatimusten esittämisestä. Viimeinen asianomainen sääntelyviranomainen vastaanotti muutetun ehdotuksen 20.8.2025.
- (11) Energiavirasto sekä muut Baltian kapasiteetin laskenta-alueen kansalliset sääntelyviranomaiset arvioivat muutettua ehdotusta ja tulivat yhteiseen tulokseen siitä, että ehdotus täyttää muutospyyntöön vaatimukset ja on pääpiirteittäin hyväksyttävissä. Sääntelyviranomaiset tunnistivat kuitenkin ehdotuksessa vielä puutteita koskien erityisesti Whereas -osaa, jonka katsottiin edellyttävän tarkennuksia.

Muutetun ehdotuksen tarkistaminen

- (12) FCA suuntaviivojen 4 artiklan 5 kohdan mukaisesti sääntelyviranomaiset voivat tarvittaessa tarkistaa ehdotuksia ennen niiden hyväksymistä, kuultuaan ensin asianomaisia siirtoverkonhaltijoita. Energiavirasto yhdessä muiden asianomaisten Baltian kapasiteetin laskenta-alueen kansallisten sääntelyviranomaisten kanssa tarkisti ehdotusta ja toimitti sen Fingridille 23.9.2025 kuulemista varten.
- (13) Fingrid ja asianomaiset Baltian kapasiteetin laskenta-alueen siirtoverkonhaltijat toimittivat yhteisen lausuntonsa Energiavirastolle 25.9.2025, vahvistaen, että muutettu ja tarkistettu ehdotus on heidän näkökulmastaan täysin hyväksyttävissä
- (14) Asianomaisten sääntelyviranomaisten yhteisesti valmistelemat muutokset menetelmään on eritelty tämän päätöksen liitteenä olevassa dokumentissa: *"Position paper by the Baltic States National Regulatory Authorities of Estonia, Finland and Latvia on Finnish, Estonian and Latvian TSOs of Baltic CCR TSOs' Common Methodology for Splitting Long-Term Cross-Zonal Capacity in Accordance with Article 16 of Commission Regulation (EU) 2016/1719 of 26 September 2016 Establishing a Guideline on Forward Capacity Allocation"*.

Energiaviraston toimivalta

- (15) Euroopan parlamentin ja neuvoston direktiivi 2019/944 sähkön sisämarkkinoita koskevista yhteisistä säännöistä ja direktiivin 2012/27/EU muuttamisesta 57 artiklan mukaan kunkin jäsenvaltion on nimettävä yksi kansallinen sääntelyviranomainen kansallisella tasolla.
- (16) Lain Energiavirastosta (870/2013) 1 §:n 2 momentin mukaan Energiavirasto hoitaa kansalliselle sääntelyviranomaiselle kuuluvat tehtävät, joista säädetään:

- (17) 3) sähkön sisämarkkinoita koskevista yhteisistä säännöistä ja direktiivin 2012/27/EU muuttamisesta annetun Euroopan parlamentin ja neuvoston direktiivin (EU) 2019/944, jäljempänä *sähkömarkkinadirektiivi*, nojalla annetuissa delegoiduissa säädöksissä;

Asiaan liittyvä lainsäädäntö

Komission asetus (EU) 2016/1719 pitkän aikavälin kapasiteetin jakamista koskevista suuntaviivoista (FCA suuntaviivat)

FCA suuntaviivojen 3 artiklan mukaan:

”Tämän asetuksen tavoitteena on

- a) edistää tehokasta alueiden välistä pitkän aikavälin kauppaa, joka tarjoaa markkinaosapuolille alueiden välisiä pitkän aikavälin suojausmahdollisuuksia;
- b) optimoida alueiden välisen pitkän aikavälin kapasiteetin laskenta ja jakaminen;
- c) tarjota syrjimätön pääsy alueiden väliseen pitkän aikavälin kapasiteettiin;
- d) varmistaa siirtoverkonhaltijoiden, viraston, sääntelyviranomaisten ja markkinaosapuolten oikeudenmukainen ja syrjimätön kohtelu;
- e) ottaa huomioon tarve taata oikeudenmukainen ja säännönmukaisesti toimiva pitkän aikavälin kapasiteetin jakaminen sekä säännönmukainen hinnanmuodostus;
- f) varmistaa pitkän aikavälin kapasiteetin jakamista koskevien tietojen avoimuus ja luotettavuus ja parantaa niitä;
- g) edistää Euroopan sähkönsiirtoverkon ja sähköalan tehokasta toimintaa ja kehittämistä pitkällä aikavälillä;”

FCA suuntaviivojen 4 artiklan mukaan:

”1. Siirtoverkonhaltijoiden on laadittava tässä asetuksessa edellytetyt ehdot ja edellytykset tai menetelmät ja annettava ne viraston tai toimivaltaisten sääntelyviranomaisten hyväksyttäväksi tässä asetuksessa asetettuihin määräaikoihin mennessä. Poikkeuksellisissa olosuhteissa, erityisesti tapauksissa, joissa määräaikaa ei voida noudattaa siirtoverkonhaltijoista riippumattomien olosuhteiden vuoksi, ehdot ja edellytyksiä tai menetelmiä koskevia määräaikoja voivat pidentää 6 kohdan mukaisissa menettelyissä virasto ja 7 kohdan mukaisissa menettelyissä kaikki toimivaltaiset sääntelyviranomaiset yhdessä. Jos tässä asetuksessa tarkoitettuja ehdot ja edellytyksiä tai menetelmiä koskeva ehdotus on laadittava ja siitä on sovittava useamman siirtoverkonhaltijan kesken, osallistuvien siirtoverkonhaltijoiden on tehtävä tiivistä yhteistyötä. Siirtoverkonhaltijoiden, joita avustaa Sähkö-ENTSO, on säännöllisesti tiedotettava toimivaltaisille sääntelyviranomaisille ja virastolle edistymisestä näiden ehtojen ja edellytysten tai menetelmien laatimisessa.”

”5. Kukin sääntelyviranomainen ja tarvittaessa virasto vastaa 6 ja 7 kohdassa tarkoitettujen ehtojen ja edellytysten tai menetelmien hyväksymisestä. Ennen ehtojen



ja edellytysten tai menetelmien hyväksymistä virasto tai toimivaltaiset sääntelyviranomaiset tarkistavat tarvittaessa ehdotuksia, kuultuaan ensin asianomaisia siirtoverkonhaltijoita, sen varmistamiseksi, että ne ovat yhdenmukaisia tämän asetuksen tarkoituksen kanssa ja edistävät markkinoiden yhdentymistä, syrjimättömyyttä, toimivaa kilpailua ja markkinoiden tehokasta toimintaa.”

”9. Jos ehtoja ja edellytyksiä tai menetelmiä koskevan ehdotuksen hyväksyminen 7 kohdan mukaisesti tai muutoksen hyväksyminen 11 kohdan mukaisesti edellyttää useamman kuin yhden sääntelyviranomaisten päätöstä, toimivaltaisten sääntelyviranomaisten on kuultava toisiaan, tehtävä tiivistä yhteistyötä ja koordinoitava toimiaan sopimukseen pääsemiseksi. Toimivaltaisten sääntelyviranomaisten on soveltuville tapauksissa otettava huomioon viraston lausunto. Sääntelyviranomaisten tai viraston, jos sillä on toimivalta, on tehtävä 6 ja 7 kohdan mukaisesti ehdotettuja ehtoja ja edellytyksiä tai menetelmiä koskevat päätökset kuuden kuukauden kuluessa siitä, kun virasto tai, soveltuville tapauksissa, viimeinen asianomainen sääntelyviranomainen on vastaanottanut ehdot ja edellytykset tai menetelmät. Määräaika alkaa kulua sitä päivää seuraavana päivänä, jona ehdotus toimitettiin virastolle 6 kohdan mukaisesti tai viimeiselle asianomaiselle sääntelyviranomaiselle 7 kohdan mukaisesti.

10. Jos sääntelyviranomaiset eivät ole päässeet sopimukseen 9 kohdassa tarkoitettussa määräajassa tai niiden yhteisestä pyynnöstä tai viraston pyynnöstä asetuksen (EU) 2019/942 5 artiklan 3 kohdan kolmannen alakohdan mukaisesti, virasto tekee päätöksen ehtoja ja edellytyksiä tai menetelmiä koskevista ehdotuksista kuuden kuukauden kuluessa asetuksen (EU) 2019/942 5 artiklan 3 kohdan ja 6 artiklan 10 kohdan toisen alakohdan mukaisesti.

11. Jos virasto tai kaikki toimivaltaiset sääntelyviranomaiset pyytävät 6 ja 7 kohdan mukaisesti toimitettujen ehtojen ja edellytysten tai menetelmien muuttamista ennen hyväksymistä, asianomaisten siirtoverkonhaltijoiden on annettava ehdotus muutetuista ehdoista ja edellytyksistä tai menetelmistä kahden kuukauden kuluessa viraston tai toimivaltaisten sääntelyviranomaisten esittämästä pyynnöstä. Viraston tai toimivaltaisten sääntelyviranomaisten on päätettävä muutetuista ehdoista ja edellytyksistä tai menetelmistä kahden kuukauden kuluessa niiden esittämisestä. Jos toimivaltaiset sääntelyviranomaiset eivät ole päässeet sopimukseen 7 kohdan mukaisista ehdoista ja edellytyksistä tai menetelmistä kahden kuukauden määräajassa tai niiden yhteisestä pyynnöstä tai viraston pyynnöstä asetuksen (EU) 2019/942 5 artiklan 3 kohdan kolmannen alakohdan mukaisesti, virasto tekee päätöksen muutetuista ehdoista ja edellytyksistä tai menetelmistä kuuden kuukauden kuluessa asetuksen (EU) 2019/942 5 artiklan 3 kohdan ja 6 artiklan 10 kohdan toisen alakohdan mukaisesti. Jos asianomaiset siirtoverkonhaltijat eivät anna ehdotusta muutetuista ehdoista ja edellytyksistä tai menetelmistä, sovelletaan 4 kohdassa säädettyä menettelyä.

12. Virasto tai toimivaltaiset sääntelyviranomaiset yhdessä, silloin kun kukin niistä vastaa ehtojen ja edellytysten tai menetelmien hyväksymisestä 6 ja 7 kohdan mukaisesti, voi pyytää näiden ehtojen ja edellytysten tai menetelmien muuttamista koskevia ehdotuksia ja määrittää määräajan ehdotusten jättämiselle. Ehtoja ja edellytyksiä tai menetelmiä koskevan ehdotuksen laatimisesta vastaavat siirtoverkonhaltijat voivat ehdottaa muutoksia sääntelyviranomaisille ja virastolle.



Ehtojen ja edellytysten tai menetelmien muuttamista koskevista ehdotuksista on järjestettävä kuuleminen 6 artiklassa säädetyn menettelyn mukaisesti, ja ehdotukset on hyväksyttävä tässä artiklassa säädetyn menettelyn mukaisesti.”

FCA suuntaviivojen 16 artiklan mukaan:

”Alueiden välisen pitkän aikavälin kapasiteetin osittamista koskeva menetelmä

1. Kunkin kapasiteetin laskenta-alueen siirtoverkonhaltijoiden on 10 artiklassa tarkoitetun kapasiteetin laskentamenetelmää koskevan ehdotuksen antamiseen mennessä laadittava yhdessä ehdotus menetelmäksi, jonka avulla alueiden välinen pitkän aikavälin kapasiteetti ositetaan koordinoitusti eri pitkien aikavälien kesken asianomaisella alueella. Ehdotuksesta on järjestettävä kuuleminen 6 artiklan mukaisesti.

2. Alueiden välisen pitkän aikavälin kapasiteetin osittamista koskevan menetelmän on täytettävä seuraavat edellytykset:

a) se vastaa markkinaosapuolten suojaustarpeita;

b) se on yhtenäinen kapasiteetin laskentamenetelmän kanssa;

c) se ei saa johtaa kilpailunrajoituksiin varsinkaan pitkän aikavälin siirto-oikeuksien saannissa.”

Johtopäätökset

(18) Fingrid Oyj toimitti Energiavirastolle sääntelyn määräaikojen puitteissa 18.8.2025 asianomaisten Baltian kapasiteetin laskenta-alueen siirtoverkonhaltijoiden yhteisen, muutetun ehdotuksen yhteisestä pitkän aikavälin siirto-oikeuksien osittamismenetelmästä Baltian kapasiteetin laskenta-alueella.

(19) FCA suuntaviivojen 4 artiklan 5 kohdan mukaisesti sääntelyviranomaiset voivat tarvittaessa tarkistaa ehdotuksia ennen niiden hyväksymistä, kuultuaan ensin asianomaisia siirtoverkonhaltijoita. Asianomaiset Baltian kapasiteetin laskenta-alueen kansalliset sääntelyviranomaiset täydensivät ehdotusta ja Energiavirasto toimitti sen Fingridille 23.9.2025 kuulemista varten ennen menetelmän hyväksymistä. Fingrid ja muut asianomaiset Baltian kapasiteetinlaskenta-alueen siirtoverkonhaltijat vastasivat 25.9.2025 lähetetyssä lausunnossaan puoltavansa sääntelyviranomaisten tarkistuksia ja katsoivat, että muutettu ja tarkistettu ehdotus on heidän näkökulmastaan täysin hyväksyttävissä.

(20) Energiavirasto teki yhdessä muiden asianomaisten Baltian kapasiteetin laskenta-alueen kansallisten sääntelyviranomaisten kanssa seuraavat muutokset: Whereas -osaan tarkennettiin viitaukset FCA suuntaviivoihin ja pitkän aikavälin kapasiteetin laskentamenetelmään, ja 15 kohdan 2 momentti poistettiin. Artiklaan 9 täsmennettiin viittaus FCA suuntaviivojen 4 artiklaan. Sääntelyviranomaisten yhteisesti sopimat muutokset menetelmään, sekä sääntelyviranomaisten yhteinen linja on esitetty tämän päätöksen liitteenä olevassa dokumentissa ”Position paper by the Baltic States National Regulatory Authorities

of Estonia, Finland and Latvia on Finnish, Estonian and Latvian TSOs of Baltic CCR TSOs' Common Methodology for Splitting Long-Term Cross-Zonal Capacity in Accordance with Article 16 of Commission Regulation (EU) 2016/1719 of 26 September 2016 Establishing a Guideline on Forward Capacity Allocation".

- (21) FCA suuntaviivojen mukaan, jos ehtoja ja edellytyksiä tai menetelmiä koskevan ehdotuksen hyväksyminen edellyttää useamman kuin yhden sääntelyviranomaisten päätöstä, toimivaltaisten sääntelyviranomaisten on kuultava toisiaan, tehtävä tiivistä yhteistyötä ja koordinoitava toimiaan sopimukseen pääsemiseksi. Energiavirasto on tätä päätöstä valmisteltaessa tehnyt tiivistä yhteistyötä ja koordinoinut toimiaan muiden asianomaisten Baltian kapasiteetin laskenta-alueen toimivaltaisten sääntelyviranomaisten kanssa.
- (22) Energiavirasto katsoo, että Fingridin 18.8.2025 toimittama muutettu ehdotus on sääntelyviranomaisten yhdessä sopimien tarkistusten jälkeen FCA suuntaviivojen 3 artiklan tavoitteiden mukainen. Energiavirasto katsoo myös, että tarkistettu menetelmä täyttää FCA suuntaviivojen 16 artiklan 2 kohdan vaatimukset siitä, että pitkän aikavälin kapasiteetin osittamista koskeva menetelmä vastaa markkinaosapuolten suojaustarpeita, on yhtenäinen kapasiteetin laskentamenetelmän kanssa eikä johda kilpailunrajoituksiin erityisesti pitkän aikavälin siirto-oikeuksien saannissa.

Sovelletut säännökset

Komission asetus (EU) 2017/1719 artikkelat 3, 4, 16

Laki sähkö- ja maakaasumarkkinoiden valvonnasta (590/2013) 6 §, 36 §, 38 §

Laki Energiavirastosta (870/2013) 1 § 2 momentti

Muutoksenhaku

Muutoksenhakua koskeva ohjeistus liitteenä.

Tiedoksianto

Päätös annetaan tiedoksi asianosaiselle sähköisenä tiedoksiantona.

Lisätiedot

Lisätietoja päätöksestä antaa:

Asiantuntija Petr Spodniak
puh. 029 5050 090,
sähköposti petr.spodniak@energiavirasto.fi



Position paper by the Baltic States National Regulatory Authorities of Estonia, Finland and Latvia on Finnish, Estonian and Latvian TSOs of Baltic CCR TSOs' Common Methodology for Splitting Long-Term Cross-Zonal Capacity in Accordance with Article 16 of Commission Regulation (EU) 2016/1719 of 26 September 2016 Establishing a Guideline on Forward Capacity Allocation

Finnish, Estonian and Latvian TSOs of Baltic CCR TSOs' Common Methodology for Splitting Long-Term Cross-Zonal Capacity in Accordance with Article 16 of Commission Regulation (EU) 2016/1719 of 26 September 2016 Establishing a Guideline on Forward Capacity Allocation [Fingridin muutettu ehdotus]

Finnish, Estonian and Latvian TSOs of Baltic CCR TSOs' Common Methodology for Splitting Long-Term Cross-Zonal Capacity in Accordance with Article 16 of Commission Regulation (EU) 2016/1719 of 26 September 2016 Establishing a Guideline on Forward Capacity Allocation

Jakelu Fingrid Oyj

VALITUSOSOITUS

Valitusoikeus hallintopäätöksestä

Energiaviraston antamaan hallintopäätökseen saa hakea muutosta valittamalla siten kuin laissa oikeudenkäynnistä hallintoasioissa (808/2019) säädetään. Valituskelpoisella hallintopäätöksellä tarkoitetaan päätöstä, jolla asia on ratkaistu tai jätetty tutkimatta.

Hallintopäätökseen saa hakea muutosta valittamalla se, johon päätös on kohdistettu tai jonka oikeuteen, velvollisuuteen tai etuun päätös välittömästi vaikuttaa ja se, jonka valitusoikeudesta laissa erikseen säädetään.

Valitusviranomainen

Valitusviranomainen Energiaviraston päätökseen on markkinaoikeus.

Valituksen tekeminen ja valitusaika

Valituksen saa tehdä sillä perusteella, että päätös on lainvastainen.

Valitus on tehtävä kirjallisesti 30 päivän kuluessa päätöksen tiedoksisaannista.

Jos tiedoksianto on toimitettu tavallisena tiedoksiantona postitse kirjeellä vastaanottajalle, katsotaan hänen saaneen asiasta tiedon seitsemäntenä päivänä kirjeen lähettämisestä, jollei muuta näytetä. Mikäli päätös annetaan hakijalle tiedoksi sähköisenä viestinä, päätös katsotaan annetuksi tiedoksi kolmantena päivänä viestin lähettämisestä, jollei muuta näytetä. Jos päätös on postitettu saantitodistusta vastaan, vastaanottajan katsotaan saaneen asiasta tiedon saantitodistuksen osoittamana aikana. Valitusaikaa laskettaessa tiedoksiantopäivää ei oteta lukuun.

Milloin kysymyksessä on sijaistiedoksianto, tiedoksisaannin katsotaan tapahtuneen kolmantena päivänä sijaistiedoksiantoa koskevan tiedoksiantotodistuksen osoittamasta päivästä. Viranomaisen tietoon asian katsotaan tulleen kirjeen saapumispäivänä.

Kun valituksen tekemisen määräajan viimeinen päivä on pyhäpäivä, itsenäisyyspäivä, vapunpäivä, joului- tai juhannusaatto tai arkilauantai, saa valituksen toimittaa ensimmäisenä arkipäivänä sen jälkeen. Valitus on toimitettava valitusviranomaiselle viimeistään valitusajan viimeisenä päivänä ennen valitusviranomaisen aukioloajan päättymistä.

Valituksen tekemisestä säädetään lisäksi sähköisestä asioinnista viranomaistoiminnassa annetussa laissa (13/2003). Määräaikaisten laskemisesta säädetään säädettyjen määräaikain laskemisesta annetussa laissa (150/1930).



Valituksen sisältö

Valituksessa on ilmoitettava:

- päätös, johon haetaan muutosta (*valituksen kohteena oleva päätös*);
- miltä kohdin päätökseen haetaan muutosta ja mitä muutoksia siihen vaaditaan tehtäväksi (*vaatimukset*);
- vaatimusten perustelut; sekä
- mihin valitusoikeus perustuu, jos valituksen kohteena oleva päätös ei kohdistu valittajaan.

Valituksessa on lisäksi ilmoitettava valittajan nimi ja yhteystiedot. Jos puhevaltaa käyttää valittajan laillinen edustaja tai asiamies, myös tämän yhteystiedot on ilmoitettava. Yhteystietojen muutoksesta on valituksen vireillä ollessa ilmoitettava viipymättä tuomioistuimelle.

Valituksessa on ilmoitettava myös se postiosoite ja mahdollinen muu osoite, johon oikeudenkäyntiin liittyvät asiakirjat voidaan lähettää (*prosessiosoite*). Mikäli valittaja on ilmoittanut enemmän kuin yhden prosessiosoitteen, voi tuomioistuin valita, mihin ilmoitetuista osoitteista se toimittaa oikeudenkäyntiin liittyvät asiakirjat.

Oikaisuvaatimuksen tekijä saa valittaessaan oikaisuvaatimus päätöksestä esittää vaatimuksilleen uusia perusteluja. Hän saa esittää uuden vaatimuksen vain, jos se perustuu olosuhteiden muutokseen tai oikaisuvaatimuksen tekemisen määräajan päättymisen jälkeen valittajan tietoon tulleeseen seikkaan.

Valituksen liitteet

Valitukseen on liitettävä:

- valituksen kohteena oleva päätös valitusosoituksineen;
- selvitys siitä, milloin valittaja on saanut päätöksen tiedoksi, tai muu selvitys valitusajan alkamisen ajankohdasta; sekä
- asiakirjat, joihin valittaja vetoaa vaatimuksensa tueksi, jollei niitä ole jo aikaisemmin toimitettu viranomaiselle.
- asiamiestä käytettäessä valtakirja, sen mukaan kuin oikeudenkäynnistä hallintoasioissa annetun lain 32 §:ssä säädetään.



Valituskirjelmän toimittaminen valitusviranomaiselle

Valituskirjelmä on toimitettava valitusajan kuluessa markkinaoikeuteen, jonka osoite on

**Markkinaoikeus
Radanrakentajantie 5
00520 HELSINKI**

faksi: 029 56 43314
sähköposti: markkinaoikeus@oikeus.fi

Valituskirjelmä voidaan toimittaa valitusviranomaiselle myös postitse.

Valituksen voi tehdä myös hallinto- ja erityistuomioistuinten asiointipalvelussa osoitteessa <https://asiointi.oikeus.fi/hallintotuomioistuimet/#/>

Kun valituskirjelmä toimitetaan hallinto- ja erityistuomioistuinten asiointipalvelun kautta, liitteet voi toimittaa skannattuna asiointipalvelussa tai kirjeitse. Kirjeitse toimitettaessa mainitse asiasta asiointipalvelun Viesti-kentässä.

Valituskirjelmän lähettäminen postitse tai sähköisesti tapahtuu lähettäjän omalla vastuulla.

Oikeudenkäyntimaksu

Valituksen käsittelystä markkinaoikeudessa voidaan periä oikeudenkäyntimaksu.

Valittajalta peritään markkinaoikeudessa oikeudenkäyntimaksu 2440 euroa.

Tuomioistuinmaksulaissa (1455/2015, <https://www.finlex.fi/fi/laki/ajan-tasa/2015/20151455?search%5Btype%5D=pika&search%5Bpika%5D=tuomiois-tuinmaksulaki#P5>) on erikseen säädetty tapauksista, joissa maksua ei peritä.

Position paper by the Baltic States National Regulatory
Authorities of Estonia, Finland and Latvia

on

Finnish, Estonian and Latvian TSOs of Baltic CCR TSOs' Common
Methodology for Splitting Long-Term Cross-Zonal Capacity in
Accordance with Article 16 of Commission Regulation (EU)
2016/1719 of 26 September 2016 Establishing a Guideline on
Forward Capacity Allocation

7 October 2025

1. INTRODUCTION AND LEGAL CONTEXT

Pursuant to Articles 4(1), 4(7)(b), and 16(1) of the Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline on forward capacity allocation (hereinafter - Regulation 2016/1719), the transmission system operators of the Baltic capacity calculation region (CCR) are required to jointly develop a proposal for a methodology for splitting long-term cross-zonal capacity in a coordinated manner between different long-term time frames within the respective region. The methodology for splitting long-term cross-zonal capacity applies to the Finnish-Estonian and Estonian-Latvian bidding zone borders.

This document elaborates an agreement, between National Regulatory Authorities of Estonia, Finland and Latvia (hereinafter – NRAs)¹, agreed on 7 October 2025, on the Finnish, Estonian and Latvian transmission system operators (hereinafter – the TSOs)² proposal on the Baltic Capacity Calculation Region (hereinafter – Baltic CCR) Common Methodology for Splitting Long-Term Cross-Zonal Capacity in Accordance with Article 16 of Regulation 2016/1719 (hereinafter – LTCS Proposal).

The TSOs submitted the LTCS Proposal in accordance with Article 16(1) of the Regulation 2016/1719 and the last concerned NRA received the proposal on 18 February 2025.

Article 4(9) of the Regulation 2016/1719 requires NRAs to consult and closely cooperate and coordinate with each other in order to reach an agreement and take a decision within six months following receipt of submission of the proposal to the last Baltic NRA.

On 19 June 2025 in accordance with Article 4(11) of the Regulation 2016/1719 the NRAs jointly requested an amendment to the LTCS Proposal. On 20 August 2025 the TSOs submitted an amended LTCS Proposal for approval within 2 months following the request from NRAs.

The NRAs shall decide on the amended LTCS Proposal within 2 months following from its submission, no later than 21 October 2025.

This agreement of the NRAs shall provide evidence that the LTCS Proposal, does not, at this stage, need to be adopted by the Agency for the Cooperation of Energy Regulators (hereinafter ACER or Agency) pursuant to Article 4(10) of the Regulation 2016/1719. It is intended to constitute the basis on which the NRAs will each subsequently issue a national decision to approve the LTCS Proposal, pursuant to Article 4(9) of the Regulation 2016/1719.

The legal provisions that lie at the basis of the LTCS Proposal, and this NRAs' agreement on the LTCS Proposal can be found in Articles 3, 4 and 16 of the Regulation 2016/1719, and in Article 5 of the Regulation (EU) 2019/942 of the European Parliament and of the Council of 5 June 2019 establishing a European Union Agency for the Cooperation of Energy Regulators (hereinafter – Regulation 2019/942). These articles are set out below for reference.

¹ Estonian Competition Authority, Energy Authority of Finland, Public Utilities Commission of Latvia

² Elering AS, Fingrid Oyj, AS "Augstsprieguma tīkls"

Article 3

Objectives of forward capacity allocation

This Regulation aims at:

- (a) promoting effective long-term cross-zonal trade with long-term cross-zonal hedging opportunities for market participants;*
- (b) optimising the calculation and allocation of long-term cross-zonal capacity;*
- (c) providing non-discriminatory access to long-term cross-zonal capacity;*
- (d) ensuring fair and non-discriminatory treatment of TSOs, the Agency, regulatory authorities and market participants;*
- (e) respecting the need for a fair and orderly forward capacity allocation and orderly price formation;*
- (f) ensuring and enhancing the transparency and reliability of information on forward capacity allocation;*
- (g) contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union.*

Article 4

Adoption of terms and conditions or methodologies (...)

1. TSOs shall develop the terms and conditions or methodologies required by this Regulation and submit them for approval to the Agency or the competent regulatory authorities within the respective deadlines set out in this Regulation. In exceptional circumstances, notably in cases where a deadline cannot be met due to circumstances external to the sphere of TSOs, the deadlines for terms and conditions or methodologies may be prolonged by the Agency in procedures pursuant to paragraph 6, and jointly by all competent regulatory authorities in procedures pursuant to paragraph 7. Where a proposal for terms and conditions or methodologies pursuant to this Regulation needs to be developed and agreed by more than one TSO, the participating TSOs shall closely cooperate. TSOs, with the assistance of the ENTSO for Electricity, shall regularly inform the competent regulatory authorities and the Agency about the progress of the development of those terms and conditions or methodologies.

(...)

5. Each regulatory authority or where applicable the Agency, as the case may be, shall be responsible for approving the terms and conditions or methodologies referred to in paragraphs 6 and 7. Before approving the terms and conditions or methodologies, the Agency or the competent regulatory authorities shall revise the proposals where necessary, after consulting the respective TSOs, in order to ensure that they are in line with the purpose of this Regulation and contribute to market integration, non-discrimination, effective competition and the proper functioning of the market.

(...)

7. The proposals for the following terms and conditions or methodologies and any amendments thereof shall be subject to approval by all regulatory authorities of the concerned region:

(...)

b) the methodology for splitting cross-zonal capacity pursuant to Article 16;

(...)

9. Where the approval of the terms and conditions or methodologies in accordance with paragraph 7 or the amendment in accordance with paragraph 11 requires a decision by more than one regulatory authority, the competent regulatory authorities shall consult and closely cooperate and coordinate with each other in order to reach an agreement. Where applicable, the competent regulatory authorities shall take into account the opinion of the Agency. Regulatory authorities or, where competent, the Agency shall take decisions concerning the submitted terms and conditions or methodologies in accordance with paragraphs 6 and 7, within 6 months following the receipt of the terms and conditions or methodologies by the Agency or, where applicable, by the last regulatory authority concerned. The period shall begin on the day following that on which the proposal was submitted to the Agency in accordance with paragraph 6 or to the last regulatory authority concerned in accordance with paragraph 7.

10. Where the regulatory authorities have not been able to reach an agreement within the period referred to in paragraph 9, or upon their joint request, or upon the Agency's request according to the third subparagraph of Article 5(3) of Regulation (EU) 2019/942, the Agency shall adopt a decision concerning the submitted proposals for terms and conditions or methodologies within 6 months, in accordance with Article 5(3) and the second subparagraph of Article 6(10) of Regulation (EU) 2019/942.

11. In the event that the Agency or all competent regulatory authorities jointly request an amendment to approve the terms and conditions or methodologies submitted in accordance with paragraphs 6 and 7, the relevant TSOs shall submit a proposal for amended terms and conditions or methodologies for approval within 2 months following the request from the Agency or the regulatory authorities. The Agency or the competent regulatory authorities shall decide on the amended terms and conditions or methodologies within 2 months following their submission. Where the competent regulatory authorities have not been able to reach an agreement on terms and conditions or methodologies pursuant to paragraph 7 within the 2-month deadline, or upon their joint request, or upon the Agency's request according to the third subparagraph of Article 5(3) of Regulation (EU) 2019/942, the Agency shall adopt a decision concerning the amended terms and conditions or methodologies within 6 months, in accordance with Article 5(3) and the second subparagraph of Article 6(10) of Regulation (EU) 2019/942. If the relevant TSOs fail to submit a proposal for amended terms and conditions or methodologies, the procedure provided for in paragraph 4 shall apply.

(...)

13. TSOs responsible for establishing the terms and conditions or methodologies in accordance with this Regulation shall publish them on the internet after approval by the Agency or the competent regulatory authorities or, if no such approval is required,

after their establishment, except where such information is considered as confidential in accordance with Article 7.

Article 16

Methodology for splitting long-term cross-zonal capacity

1. No later than the submission of the capacity calculation methodology referred to in Article 10, the TSOs of each capacity calculation region shall jointly develop a proposal for a methodology for splitting long-term cross-zonal capacity in a coordinated manner between different long-term time frames within the respective region. The proposal shall be subject to consultation in accordance with Article 6.

2. The methodology for splitting long-term cross-zonal capacity shall comply with the following conditions:

(a) it shall meet the hedging needs of market participants;

(b) it shall be coherent with the capacity calculation methodology;

(c) it shall not lead to restrictions in competition, in particular for access to long-term transmission rights.

REGULATION 2019/942

Article 5

Tasks of ACER as regards the development and implementation of network codes and guidelines

(...)

3. Where one of the following legal acts provides for the development of proposals for terms and conditions or methodologies for the implementation of network codes and guidelines which require the approval of all the regulatory authorities of the region concerned, those regulatory authorities shall agree unanimously on the common terms and conditions or methodologies to be approved by each of those regulatory authorities:

(a) a legislative act of the Union adopted under the ordinary legislative procedure;

(b) network codes and guidelines that were adopted before 4 July 2019 and subsequent revisions of those network codes and guidelines; or

(c) network codes and guidelines adopted as implementing acts pursuant to Article 5 of Regulation (EU) No 182/2011.

(...)

6. Before approving the terms and conditions or methodologies referred to in paragraphs 2 and 3, the regulatory authorities, or, where competent, ACER, shall revise them where necessary, after consulting the ENTSO for Electricity, the ENTSO for Gas or the EU DSO entity, in order to ensure that they are in line with the purpose

of the network code or guideline and contribute to market integration, non-discrimination, effective competition and the proper functioning of the market. ACER shall take a decision on the approval within the period specified in the relevant network codes and guidelines. That period shall begin on the day following that on which the proposal was referred to ACER.

2. THE PROPOSAL AND PROCESS

The NRAs have conducted a thorough and coordinated assessment of the amended LTCS Proposal. Having assessed the amended LTCS proposal, the NRAs came to the conclusion that even though the amendments are largely in line with the request for amendments, there still are some places to improve. As a result, the NRAs decided to revise parts of the LTCS Proposal before the approval, in accordance with Article 5(6) of Regulation 2019/942 and Article 4(5) of the Regulation 2016/1719. On 23 September 2025, the NRAs sent a letter to the TSOs' representatives to consult the TSOs on the planned revisions to the methodology and to provide their opinion on the proposed corrections within 14 calendar days. On 25 September 2025 the TSOs informed that they have reviewed the NRAs proposal and find it fully acceptable.

3. NRAS' REVISIONS ON THE AMENDED LTCS PROPOSAL

NRAs decided to revise the LTCS Proposal by making the following changes:

(Added corrections are marked in red and removed parts are crossed out.)

Whereas (13):

(13) The LTCS does not hinder an efficient long-term operation in Baltic CCR and adjacent CCRs, and the development of the transmission system in the European Union (Article 3(g) of the FCA Regulation). The LTCS serves the objective of efficient long-term operation and development of the electricity transmission system and electricity sector in the European Union (Article 3 (g) of the FCA Regulation) by taking into account **Long – term CCM developed in accordance with Article 10 of the FCA Regulation and approved pursuant to Article 4(7)(a) of FCA Regulation** when determining the capacities for the purpose of allocating LTTRs, and by contributing to the hedging opportunities of the market participants.

Whereas (15):

(15) The calculation of the LTTR volumes on the Finland–Estonia bidding zone border takes into account the technical capabilities of the two HVDC interconnectors (i.e. ESTLINK 1 and ESTLINK 2) of this border by limiting the volumes of the FI-EE LTTRs to reflect the maximum physical flow of electricity in a situation where only one interconnector is in use. Initially, the TSOs active on this border considered it feasible to limit the sum of yearly and monthly LTTRs to 650 MW, which corresponds to the maximum physical electricity flow hosted by the larger of the two interconnectors (i.e. ESTLINK 2). ~~Due to procedural reasons, this approach is still maintained in this proposal although the concerned TSOs after the launch of the public consultation of this proposal identified a clear need to limit the sum of the yearly and monthly FI-EE LTTR volumes to reflect the actual observed technical capability of the interconnectors. Therefore, following the submission of this current proposal, the concerned TSOs are planning to submit a new proposal in near future to take into account this obtained new information. In the new proposal, the concerned TSOs will~~

~~propose a change that is expected to primarily alleviate the impacts of the observed underselling of the FI-EE LTTRs, thus preventing a transfer of wealth from tariff payers to traders.~~

Other corrections on:

- The title page – **October 2025**
- Whereas (5) - **FCA Regulation** instead of Regulation FCA
- in Article 9(2) - ... in accordance with Article 4(9), Article 4(10) and Article **4**(11) ...

4. CONCLUSIONS

The NRAs have consulted, closely cooperated and coordinated to reach an agreement on the LTCS Proposal which after the NRAs revision meets the requirements of the Regulation 2016/1719 and can thus be approved by the NRAs. Thereby, the NRAs shall take their respective national decisions to approve the LTCS proposal, based on this agreement.

Finnish, Estonian and Latvian TSOs of
Baltic CCR TSOs' Common Methodology
for Splitting Long-Term Cross-Zonal
Capacity in Accordance with Article 16 of
Commission Regulation (EU) 2016/1719 of
26 September 2016 Establishing a
Guideline on Forward Capacity Allocation

18th August 2025
for NRAs approval

TSO:n mu

Finnish, Estonian and Latvian TSOs of Baltic CCR TSOs, taking into account the following:

Whereas

(1) This document by Finnish, Estonian and Latvian Transmission System Operators of Baltic Capacity Calculation Region (hereafter referred to as “Baltic CCR”) as defined in accordance with Article 15 of Commission Regulation (EU) 2015/1222 establishing a guideline on Capacity Allocation and Congestion Management (hereafter referred to as the “CACM Regulation”) describes a common Methodology for Splitting Long-Term Cross-Zonal Capacity (hereafter referred to as the “LTCS”) in accordance with Article 16 of the Commission Regulation 2016/1719 (hereafter referred to as the “FCA Regulation”).

(2) This LTCS takes into account the general principles, goals and other methodologies set in the FCA Regulation, CACM Regulation, Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a Guideline on Electricity Transmission System Operation (hereafter referred to as “SO Regulation”), and Regulation 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (hereafter referred to as “Regulation No 2019/943”).

(3) The goal of the FCA Regulation is the coordination and harmonisation of cross-zonal capacity calculation and capacity allocation in the forward markets, and it sets requirements for the TSOs to cooperate on the level of capacity calculation regions (hereinafter referred to as “CCRs”), on a pan-European level and across bidding zone borders. The FCA Regulation also sets rules for establishing capacity calculation methodologies based either on the coordinated net transmission capacity approach (hereafter referred to as “CNTC approach”) or on the flow-based approach (hereafter referred to as “FB approach”). In case of the TSO(s) allocating long term transmissions rights (hereinafter referred to as “LTTRs”), the FCA Regulation also sets rules for establishing a methodology for the splitting of long term capacity on different time frames, e.g. month and year.

(4) This LTCS fulfills the requirement of Article 16(2)(a) of the FCA Regulation as it ensures the availability of LTTRs for market participants at least for the yearly and monthly timeframes.

(5) This LTCS fulfills the requirement of Article 16(2)(b) by taking into account the Capacity Calculation Methodology developed in accordance with Article 10 of the Regulation FCA (hereinafter „Long-term CCM“), and approved pursuant to Article 4(7)(a) of Regulation FCA, thereby being coherent with the said methodology.

(6) This LTCS fulfills the requirement of Article 16(2)(c) as it ensures that yearly capacity shall not be allocated for the entire volume in the yearly auction in order to allow market participants to cover their hedging needs at least on yearly and monthly timeframes and thus allowing the market participant to access hedging opportunities in both timeframes. Further, this LTCS does not lead to restrictions in competition, in particular for access to long-term transmission rights, as the splitted long-term cross-zonal capacity is allocated in public auctions.

(7) Article 4(8) of the FCA Regulation requires that the expected impact of the LTCS on the objectives of the FCA Regulation is described. The impact is presented below (points (8) to (12) of this Whereas Section).

(8) The LTCS contributes to and does not in any way hamper the achievement of the objectives of Article 3 of the FCA Regulation. In particular, the LTCS serves the objectives of optimising the calculation and allocation of long-term transmission rights (Article 3(b) of the FCA Regulation), providing non-discriminatory access to long-term transmission rights (Article 3(c) of the FCA Regulation), respecting the need for a fair and orderly forward capacity allocation and orderly price formation (Article 3(e) of the FCA Regulation), ensuring and enhancing the transparency and reliability

of information on forward capacity allocation (Article 3(f) of the FCA Regulation) and contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union (Article 3(g) of the FCA Regulation).

(9) The LTCS serves the objective of optimising the calculation and allocation of long-term transmission rights in accordance with Article 3(b) of the FCA Regulation by using the Long-term CCM of the Baltic CCR for calculating the available long-term cross-zonal capacities and using these values as a point of departure for determining the capacities provided for the purpose of allocating LTTRs.

(10) The LTCS provides non-discriminatory access to LTTRs (Article 3(c) of the FCA Regulation) as there are no barriers for access to the auction of LTTRs if the conditions, cf. the Harmonised Allocations Rules, are fulfilled. Moreover it ensures fair and nondiscriminatory treatment of TSOs, the Agency, regulatory authorities and market participants (Article 3(d) of the FCA Regulation) as the rules provide no undue discrimination for market participants and allows for access to data by the Agency regulatory authorities and market participants.

(11) The LTCS contributes to the objective of respecting the need for a fair and orderly forward capacity allocation and price formation (Article 3(e) of the FCA Regulation) by making available in due time the cross-zonal capacity to be released in the long-term time frame and forward markets, where appropriate.

(12) The LTCS serves the objective of transparency and reliability of information (Article 3(f) of the FCA Regulation) as the LTCS determines the main principles and main processes for allocating LTTRs. The LTCS enables Baltic CCR TSOs to provide market participants with the same reliable information on cross-zonal capacities and allocation constraints for long-term allocation and forecasting purposes in a transparent way. To facilitate transparency, Baltic CCR TSOs will publish data to the market on a regular basis to help market participants to evaluate the LTTR process and long-term capacity forecasts. Baltic CCR TSOs will engage stakeholders in dialogue to specify necessary hedging needs to this effect.

(13) The LTCS does not hinder an efficient long-term operation in Baltic CCR and adjacent CCRs, and the development of the transmission system in the European Union (Article 3(g) of the FCA Regulation). The LTCS serves the objective of efficient long-term operation and development of the electricity transmission system and electricity sector in the European Union (Article 3 (g) of the FCA Regulation) by taking into account the operational security limits when determining the capacities for the purpose of allocating LTTRs, and by contributing to the hedging opportunities of the market participants.

(14) In conclusion, the methodology for splitting rules contributes to the general objectives of the FCA Regulation to the benefit of market participants and electricity end consumers.

(15) The calculation of the LTTR volumes on the Finland–Estonia bidding zone border takes into account the technical capabilities of the two HVDC interconnectors (i.e. ESTLINK 1 and ESTLINK 2) of this border by limiting the volumes of the FI-EE LTTRs to reflect the maximum physical flow of electricity in a situation where only one interconnector is in use. Initially, the TSOs active on this border considered it feasible to limit the sum of yearly and monthly LTTRs to 650 MW, which corresponds to the maximum physical electricity flow hosted by the larger of the two interconnectors (i.e. ESTLINK 2). Due to procedural reasons, this approach is still maintained in this proposal although the concerned TSOs after the launch of the public consultation of this proposal identified a clear need to limit the sum of the yearly and monthly FI-EE LTTR volumes to reflect the actual observed technical capability of the interconnectors. Therefore, following the submission of this current proposal, the concerned TSOs are planning to submit a new proposal in near future to take into account this obtained new information. In the new proposal, the concerned TSOs will propose a change that is expected to primarily alleviate the impacts of the observed underselling of the FI-EE LTTRs, thus preventing a transfer of wealth from tariff payers to traders.

**SUBMIT THE FOLLOWING METHODOLOGY FOR SPLITTING RULES TO THE
FINNISH, ESTONIAN AND LATVIAN BALTIC CCR REGULATORY AUTHORITIES:**

TITLE I

General

Article 1

Subject matter and scope

1. The LTCS is the methodology of Baltic CCR in accordance with Article 16(2) of the FCA Regulation.
2. This LTCS applies solely to the bidding zones borders:
 - a. Finland – Estonia
 - b. Estonia - Latvia
3. This LTCS covers the methodology for splitting capacity calculated as long-term cross-zonal capacity for the long-term time frame, for which the LTTRs are foreseen in the regional design of long-term transmission rights pursuant to Article 31 of FCA Regulation.

Article 2

Definitions and interpretation

1. For the purposes of the Proposal, the terms used shall have the meaning given to them in Article 2 of Regulation 2019/943 , Article 2 of the FCA Regulation, Article 2 of the CACM Regulation, Article 2 of the Harmonised Allocation Rules for long - term transmission rights in accordance with Article 51 of FCA Regulation (EU) and Article 2 of Commission Regulation (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council (hereafter referred to as "Transparency Regulation") and Article 2 of capacity calculation methodology developed in Baltic CCR in accordance with Article 20(2) of the CACM Regulation.
2. In addition, in this LTCS, the following terms shall have the meaning below:
 - a. "LTTR" means a Physical or a Financial Long Term Transmission Rights;
 - b. "HAR" means Harmonised Allocation Rules;
 - c. "SAP" means Single Allocation Platform;
 - d. "FCA Regulation" means guideline on Forward Capacity Allocation;
 - e. "Long-term CCM " means the Capacity Calculation Methodology in accordance with Article 10 of the FCA Regulation.
3. In this LTCS, unless the context requires otherwise:
 - a. the singular indicates the plural and vice versa;
 - b. headings are inserted for convenience only and do not affect the interpretation of this LTCS; and

- c. any reference to legislation, regulations, directives, orders, instruments, codes or any other enactment shall include any modification, extension or re-enactment of it when in force.

4. For the sake of clarity this LTCS does not affect TSOs' right to delegate all or part of their task in accordance with the Article 62 of the FCA Regulation. In this LTCS "TSO" shall refer to Transmission System Operator or to a third party whom the TSO has delegated task(s) to in accordance with the FCA Regulation, where applicable. However, the delegating TSO shall remain responsible for ensuring compliance with the obligations under the FCA Regulation and under the HAR.

TITLE 2

Applying of capacity calculated for long-term time frame

Article 3

Applying of capacity calculated for long-term time frame

1. The Baltic CCR TSOs shall apply the long term capacity calculated by the methodology set out by the Long-term CCM for each long term time frame as a point of departure for calculating the amount of LTTRs for the different time frames. This methodology applies to all time frames foreseen in the regional design of long-term transmission rights in accordance with Article 31(2) of the FCA Regulation.

2. The Baltic CCR TSOs shall apply the following procedure when splitting and issuing the amount of LTTRs for each different time frames:

- a. A week prior to the yearly allocation, the amount of yearly LTTRs for the upcoming yearly allocation shall be published to the market.
- b. If relevant, once a quarter and no later than two (2) Working Days prior to the quarterly allocation, the amount of quarterly LTTRs shall be publish to the market.
- c. Once a month and no later than two (2) Working Days prior to the monthly allocation, the amount of LTTRs with a monthly time frame shall be published to the market.
- d. In case other time frames than year, quarter and month are introduced, the amount of LTTRs within that time frame shall be published to the market no later than two working days prior to the allocation in the month before the time frame of where the LTTRs apply.

Article 4

Methodology for splitting long-term cross-zonal capacity

1. The relevant TSOs shall split the calculated long-term cross-zonal capacity for each forward capacity allocation by applying the methodology for splitting cross-zonal capacity pursuant to point 3 in this Article 4.

2. The splitting of long-term cross-zonal capacity shall be performed primarily by relevant TSOs. The relevant TSOs may delegate the splitting of long-term cross-zonal capacity to the coordinated capacity calculator provided that they have evaluated the effectiveness of this function as performed by the coordinated capacity calculator, in accordance with Article 62(1) of the FCA Regulation. Delegation to the coordinated capacity calculator (Baltic Regional Coordination Centre, hereafter referred to as "BRCC") shall only take place if the TSOs determine that the BRCC can effectively carry out this function.

3. The calculation of amount of LTTRs for each timeframe shall be done in the following way:

a. The long-term cross-zonal capacity (hereinafter referred to as "LTCZC") for respective timeframe and respective border shall be calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10.

b. The following splitting shares of long-term cross-zonal capacity for EE-LV border shall be applied when allocating yearly, quarterly and monthly shares of LTTRs capacity (in MW). When allocating shares of LTTR capacity, the limiting factor is the forecast value of LTCZC. For EE-LV border maximum % of LTCZC that can be reserved for Baltic frequency reserves market for balancing reserves sharing and exchange is set in the Methodology for the market-based allocation process of cross-zonal capacity for the exchange of balancing capacity for the Baltic CCR in accordance with Article 41(1) of the Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing:

$$LTTR_{Y(n)} = \min (\Omega * \min LTCZC_{Y(n)}; 300)$$

$$LTTR_{Q(n)} = \min (\Omega * \min LTCZC_{Q(n)} - LTTR_{Y(n)}; 50)$$

$$LTTR_{M(n)} = \min (\Omega * \min LTCZC_{M(n)} - LTTR_{Y(n)} - LTTR_{Q(n)}; 100)$$

Where:

LTTR_{Y(n)} – LTTRs capacity offered in yearly timeframe for year n in MW;

LTTR_{Q(n)} – LTTRs capacity offered in relevant quarterly timeframe for year n in MW;

LTTR_{M(n)} – LTTRs capacity offered in relevant monthly timeframe for year n in MW;

Ω - the maximum actual share of cross-zonal capacity (as a percentage of day-ahead NTC) in the direction from Estonia to Latvia reserved for the exchange of balancing capacity within the Baltic CCR, per market time unit, during the six-month period preceding the month in which the forward capacity allocation takes place, excluding the top 1% of market time units with the highest allocated share of cross-zonal capacity;

minLTCZC_{Y(n)} – the minimum forecasted monthly NTC value in MW of the long-term cross-zonal capacity for respective border and respective year (n) calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10;

minLTCZC_{Q(n)} – the minimum forecasted monthly NTC value in MW of the long-term cross-zonal capacity for respective border and respective year (n) or quarter (n) calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10;

minLTCZC_{M(n)} – the minimum forecasted daily NTC value in MW of the long-term cross-zonal capacity for respective border and respective month n calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10.

c. The following splitting shares of long-term cross-zonal capacity for FI-EE border shall be applied when allocating yearly and monthly shares of LTTRs capacity (in MW):

$$LTTR_{Y(n)} = \min (\min LTCZC_{Y(n)}; 350)$$

$$LTTR_{M(n)} = \min (\min LTCZC_{M(n)} - LTTR_{Y(n)}; 300)$$

Where:

LTTR_{Y(n)} – LTTRs capacity offered in yearly timeframe for year n in MW;

LTTR_{M(n)} – LTTRs capacity offered in relevant monthly timeframe for year n in MW;

minLTCZC_{Y(n)} – the minimum forecasted monthly NTC value in MW of the long-term cross-zonal capacity for respective border and respective year (n) calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10;

minLTCZC_{M(n)} – the minimum forecasted daily NTC value in MW of the long-term cross-zonal capacity for respective border and respective month n calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10.

Article 5

Rules for avoiding undue discrimination of access to purchase of long term transmissions right

1. In accordance with article 16(2c) of FCA Regulation there shall be no restrictions on the access to purchase LTTRs that lead to undue discrimination of access to purchase LTTRs or undue restrictions in competition between purchasers of LTTRs in the auctions of LTTRs.
2. All market players shall be given access to purchase LTTRs if they fulfil the general condition set out in Chapter 2 and 3 of the HAR.

Article 6

Methodology for the validation of cross-zonal capacity allocated as LTTR's for long term time frame

Baltic CCR TSOs shall perform the validation of amount of LTTRs on its bidding zone border(s) to ensure that the results of regional calculation of LTTRs and splitting between time frames will ensure operational security. When performing the validation, the TSO shall consider operational security, taking into account new and relevant information obtained during or after the most recent capacity calculation.

TITLE 3

Miscellaneous

Article 7

Publication of data

1. The TSOs shall, in compliance with Article 47 of the FCA Regulation and in accordance with Article 3(f) of the FCA Regulation, and in addition to the data items and definitions of Transparency Regulation, publish data regarding the LTTR auctions on a regular basis and as soon as possible.
2. The publication of the data referred to in paragraph 1 can be done on behalf of the TSOs on SAP's web page.

Article 8

Capacity calculation process

1. Within the capacity calculation process, reduction periods may be defined in accordance with HAR Article 30. The reduction periods will not be taken into account when using the LTCS cf. Article 4.
2. When the amount of LTTRs are provided to the SAP for the auction the reduction periods will be included in the final product. This ensures that the final product allocated to the market via the SAP includes reduction periods as given by the capacity calculation process.

TITLE 4

Final provisions

Article 9

Publication and Implementation

1. Baltic CCR TSOs shall publish the LTCS without undue delay after the Baltic CCR NRAs has approved the LTCS or a decision has been taken by the Agency for the Cooperation of Energy Regulators in accordance with Article 4(9), Article 4(10) and Article (11) of the FCA Regulation regarding the methodology.
2. The methodology will be implemented from the first LTTR auction after the Baltic CCR NRAs has approved the LTCS or a decision has been taken by the Agency for the Cooperation of Energy Regulators in accordance with Article 4(9), Article 4(10) and Article (11) of the FCA Regulation regarding the methodology, and after the implementation of the Long-term CCM of Baltic CCR.

Article 10

Language

The reference language for this LTCS shall be English. For the avoidance of doubt, where TSOs need to translate this LTCS into their national language(s), in the event of inconsistencies between the English version published by TSOs in accordance with Article 4(13) of the FCA Regulation and any version in another language, the relevant TSOs shall be obliged to dispel any inconsistencies by providing a revised translation of this LTCS to their relevant national regulatory authorities.

Finnish, Estonian and Latvian TSOs of
Baltic CCR TSOs' Common Methodology
for Splitting Long-Term Cross-Zonal
Capacity in Accordance with Article 16 of
Commission Regulation (EU) 2016/1719 of
26 September 2016 Establishing a
Guideline on Forward Capacity Allocation

October 2025

Whereas

(1) This document by Finnish, Estonian and Latvian Transmission System Operators of Baltic Capacity Calculation Region (hereafter referred to as “Baltic CCR”) as defined in accordance with Article 15 of Commission Regulation (EU) 2015/1222 establishing a guideline on Capacity Allocation and Congestion Management (hereafter referred to as the “CACM Regulation”) describes a common Methodology for Splitting Long-Term Cross-Zonal Capacity (hereafter referred to as the “LTCS”) in accordance with Article 16 of the Commission Regulation 2016/1719 (hereafter referred to as the “FCA Regulation”).

(2) This LTCS takes into account the general principles, goals and other methodologies set in the FCA Regulation, CACM Regulation, Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a Guideline on Electricity Transmission System Operation (hereafter referred to as “SO Regulation”), and Regulation 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (hereafter referred to as “Regulation No 2019/943”).

(3) The goal of the FCA Regulation is the coordination and harmonisation of cross-zonal capacity calculation and capacity allocation in the forward markets, and it sets requirements for the TSOs to cooperate on the level of capacity calculation regions (hereinafter referred to as “CCRs”), on a pan-European level and across bidding zone borders. The FCA Regulation also sets rules for establishing capacity calculation methodologies based either on the coordinated net transmission capacity approach (hereafter referred to as “CNTC approach”) or on the flow-based approach (hereafter referred to as “FB approach”). In case of the TSO(s) allocating long term transmissions rights (hereinafter referred to as “LTTRs”), the FCA Regulation also sets rules for establishing a methodology for the splitting of long term capacity on different time frames, e.g. month and year.

(4) This LTCS fulfills the requirement of Article 16(2)(a) of the FCA Regulation as it ensures the availability of LTTRs for market participants at least for the yearly and monthly timeframes.

(5) This LTCS fulfills the requirement of Article 16(2)(b) by taking into account the Capacity Calculation Methodology developed in accordance with Article 10 of the FCA Regulation (hereinafter „Long-term CCM“), and approved pursuant to Article 4(7)(a) of FCA Regulation, thereby being coherent with the said methodology.

(6) This LTCS fulfills the requirement of Article 16(2)(c) as it ensures that yearly capacity shall not be allocated for the entire volume in the yearly auction in order to allow market participants to cover their hedging needs at least on yearly and monthly timeframes and thus allowing the market participant to access hedging opportunities in both timeframes. Further, this LTCS does not lead to restrictions in competition, in particular for access to long-term transmission rights, as the splitted long-term cross-zonal capacity is allocated in public auctions.

(7) Article 4(8) of the FCA Regulation requires that the expected impact of the LTCS on the objectives of the FCA Regulation is described. The impact is presented below (points (8) to (12) of this Whereas Section).

(8) The LTCS contributes to and does not in any way hamper the achievement of the objectives of Article 3 of the FCA Regulation. In particular, the LTCS serves the objectives of optimising the calculation and allocation of long-term transmission rights (Article 3(b) of the FCA Regulation), providing non-discriminatory access to long-term transmission rights (Article 3(c) of the FCA Regulation), respecting the need for a fair and orderly forward capacity allocation and orderly price formation (Article 3(e) of the FCA Regulation), ensuring and enhancing the transparency and reliability of information on forward capacity allocation (Article 3(f) of the FCA Regulation) and contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union (Article 3(g) of the FCA Regulation).

(9) The LTCS serves the objective of optimising the calculation and allocation of long-term transmission rights in accordance with Article 3(b) of the FCA Regulation by using the Long-term CCM of the Baltic CCR for calculating the available long-term cross-zonal capacities and using these values as a point of departure for determining the capacities provided for the purpose of allocating LTTRs.

(10) The LTCS provides non-discriminatory access to LTTRs (Article 3(c) of the FCA Regulation) as there are no barriers for access to the auction of LTTRs if the conditions, cf. the Harmonised Allocations Rules, are fulfilled. Moreover it ensures fair and nondiscriminatory treatment of TSOs, the Agency, regulatory authorities and market participants (Article 3(d) of the FCA Regulation) as the rules provide no undue discrimination for market participants and allows for access to data by the Agency regulatory authorities and market participants.

(11) The LTCS contributes to the objective of respecting the need for a fair and orderly forward capacity allocation and price formation (Article 3(e) of the FCA Regulation) by making available in due time the cross-zonal capacity to be released in the long-term time frame and forward markets, where appropriate.

(12) The LTCS serves the objective of transparency and reliability of information (Article 3(f) of the FCA Regulation) as the LTCS determines the main principles and main processes for allocating LTTRs. The LTCS enables Baltic CCR TSOs to provide market participants with the same reliable information on cross-zonal capacities and allocation constraints for long-term allocation and forecasting purposes in a transparent way. To facilitate transparency, Baltic CCR TSOs will publish data to the market on a regular basis to help market participants to evaluate the LTTR process and long-term capacity forecasts. Baltic CCR TSOs will engage stakeholders in dialogue to specify necessary hedging needs to this effect.

(13) The LTCS does not hinder an efficient long-term operation in Baltic CCR and adjacent CCRs, and the development of the transmission system in the European Union (Article 3(g) of the FCA Regulation). The LTCS serves the objective of efficient long-term operation and development of the electricity transmission system and electricity sector in the European Union (Article 3 (g) of the FCA Regulation) by taking into account the Long – term CCM developed in accordance with Article 10 of the FCA Regulation and approved pursuant to Article 4(7)(a) of FCA Regulation when determining the capacities for the purpose of allocating LTTRs, and by contributing to the hedging opportunities of the market participants.

(14) In conclusion, the methodology for splitting rules contributes to the general objectives of the FCA Regulation to the benefit of market participants and electricity end consumers.

(15) The calculation of the LTTR volumes on the Finland–Estonia bidding zone border takes into account the technical capabilities of the two HVDC interconnectors (i.e. ESTLINK 1 and ESTLINK 2) of this border by limiting the volumes of the FI-EE LTTRs to reflect the maximum physical flow of electricity in a situation where only one interconnector is in use. Initially, the TSOs active on this border considered it feasible to limit the sum of yearly and monthly LTTRs to 650 MW, which corresponds to the maximum physical electricity flow hosted by the larger of the two interconnectors (i.e. ESTLINK 2).

TITLE I

General

Article 1

Subject matter and scope

1. The LTCS is the methodology of Baltic CCR in accordance with Article 16(2) of the FCA Regulation.
2. This LTCS applies solely to the bidding zones borders:
 - a. Finland – Estonia
 - b. Estonia - Latvia
3. This LTCS covers the methodology for splitting capacity calculated as long-term cross-zonal capacity for the long-term time frame, for which the LTTRs are foreseen in the regional design of long-term transmission rights pursuant to Article 31 of FCA Regulation.

Article 2

Definitions and interpretation

1. For the purposes of the Proposal, the terms used shall have the meaning given to them in Article 2 of Regulation 2019/943 , Article 2 of the FCA Regulation, Article 2 of the CACM Regulation, Article 2 of the Harmonised Allocation Rules for long - term transmission rights in accordance with Article 51 of FCA Regulation (EU) and Article 2 of Commission Regulation (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council (hereafter referred to as "Transparency Regulation") and Article 2 of capacity calculation methodology developed in Baltic CCR in accordance with Article 20(2) of the CACM Regulation.
2. In addition, in this LTCS, the following terms shall have the meaning below:
 - a. "LTTR" means a Physical or a Financial Long Term Transmission Rights;
 - b. "HAR" means Harmonised Allocation Rules;
 - c. "SAP" means Single Allocation Platform;
 - d. "FCA Regulation" means guideline on Forward Capacity Allocation;
 - e. "Long-term CCM " means the Capacity Calculation Methodology in accordance with Article 10 of the FCA Regulation.
3. In this LTCS, unless the context requires otherwise:
 - a. the singular indicates the plural and vice versa;
 - b. headings are inserted for convenience only and do not affect the interpretation of this LTCS; and
 - c. any reference to legislation, regulations, directives, orders, instruments, codes or any other enactment shall include any modification, extension or re-enactment of it when in force.
4. For the sake of clarity this LTCS does not affect TSOs' right to delegate all or part of their task in accordance with the Article 62 of the FCA Regulation. In this LTCS "TSO" shall refer to Transmission System Operator or to a third party whom the TSO has delegated task(s) to in accordance with the FCA

Regulation, where applicable. However, the delegating TSO shall remain responsible for ensuring compliance with the obligations under the FCA Regulation and under the HAR.

TITLE 2

Applying of capacity calculated for long-term time frame

Article 3

Applying of capacity calculated for long-term time frame

1. The Baltic CCR TSOs shall apply the long term capacity calculated by the methodology set out by the Long-term CCM for each long term time frame as a point of departure for calculating the amount of LTTRs for the different time frames. This methodology applies to all time frames foreseen in the regional design of long-term transmission rights in accordance with Article 31(2) of the FCA Regulation.

2. The Baltic CCR TSOs shall apply the following procedure when splitting and issuing the amount of LTTRs for each different time frames:

- a. A week prior to the yearly allocation, the amount of yearly LTTRs for the upcoming yearly allocation shall be published to the market.
- b. If relevant, once a quarter and no later than two (2) Working Days prior to the quarterly allocation, the amount of quarterly LTTRs shall be publish to the market.
- c. Once a month and no later than two (2) Working Days prior to the monthly allocation, the amount of LTTRs with a monthly time frame shall be published to the market.
- d. In case other time frames than year, quarter and month are introduced, the amount of LTTRs within that time frame shall be published to the market no later than two working days prior to the allocation in the month before the time frame of where the LTTRs apply.

Article 4

Methodology for splitting long-term cross-zonal capacity

1. The relevant TSOs shall split the calculated long-term cross-zonal capacity for each forward capacity allocation by applying the methodology for splitting cross-zonal capacity pursuant to point 3 in this Article 4.

2. The splitting of long-term cross-zonal capacity shall be performed primarily by relevant TSOs. The relevant TSOs may delegate the splitting of long-term cross-zonal capacity to the coordinated capacity calculator provided that they have evaluated the effectiveness of this function as performed by the coordinated capacity calculator, in accordance with Article 62(1) of the FCA Regulation. Delegation to the coordinated capacity calculator (Baltic Regional Coordination Centre, hereafter referred to as "BRCC") shall only take place if the TSOs determine that the BRCC can effectively carry out this function.

3. The calculation of amount of LTTRs for each timeframe shall be done in the following way:

- a. The long-term cross-zonal capacity (hereinafter referred to as "LTCZC") for respective timeframe and respective border shall be calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10.

b. The following splitting shares of long-term cross-zonal capacity for EE-LV border shall be applied when allocating yearly, quarterly and monthly shares of LTTRs capacity (in MW). When allocating shares of LTTR capacity, the limiting factor is the forecast value of LTCZC. For EE-LV border maximum % of LTCZC that can be reserved for Baltic frequency reserves market for balancing reserves sharing and exchange is set in the Methodology for the market-based allocation process of cross-zonal capacity for the exchange of balancing capacity for the Baltic CCR in accordance with Article 41(1) of the Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing:

$$LTTR_{Y(n)} = \min (\Omega * \min LTCZC_{Y(n)}; 300)$$

$$LTTR_{Q(n)} = \min (\Omega * \min LTCZC_{Q(n)} - LTTR_{Y(n)}; 50)$$

$$LTTR_{M(n)} = \min (\Omega * \min LTCZC_{M(n)} - LTTR_{Y(n)} - LTTR_{Q(n)}; 100)$$

Where:

LTTR_{Y(n)} – LTTRs capacity offered in yearly timeframe for year n in MW;

LTTR_{Q(n)} – LTTRs capacity offered in relevant quarterly timeframe for year n in MW;

LTTR_{M(n)} – LTTRs capacity offered in relevant monthly timeframe for year n in MW;

Ω - the maximum actual share of cross-zonal capacity (as a percentage of day-ahead NTC) in the direction from Estonia to Latvia reserved for the exchange of balancing capacity within the Baltic CCR, per market time unit, during the six-month period preceding the month in which the forward capacity allocation takes place, excluding the top 1% of market time units with the highest allocated share of cross-zonal capacity;

minLTCZC_{Y(n)} – the minimum forecasted monthly NTC value in MW of the long-term cross-zonal capacity for respective border and respective year (n) calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10;

minLTCZC_{Q(n)} – the minimum forecasted monthly NTC value in MW of the long-term cross-zonal capacity for respective border and respective year (n) or quarter (n) calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10;

minLTCZC_{M(n)} – the minimum forecasted daily NTC value in MW of the long-term cross-zonal capacity for respective border and respective month n calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10.

c. The following splitting shares of long-term cross-zonal capacity for FI-EE border shall be applied when allocating yearly and monthly shares of LTTRs capacity (in MW):

$$LTTR_{Y(n)} = \min (\min LTCZC_{Y(n)}; 350)$$

$$LTTR_{M(n)} = \min (\min LTCZC_{M(n)} - LTTR_{Y(n)}; 300)$$

Where:

LTTR_{Y(n)} – LTTRs capacity offered in yearly timeframe for year n in MW;

LTTR_{M(n)} – LTTRs capacity offered in relevant monthly timeframe for year n in MW;

minLTCZC_{Y(n)}– the minimum forecasted monthly NTC value in MW of the long-term cross-zonal capacity for respective border and respective year (n) calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10;

minLTCZC_{M(n)}– the minimum forecasted daily NTC value in MW of the long-term cross-zonal capacity for respective border and respective month n calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10.

Article 5

Rules for avoiding undue discrimination of access to purchase of long term transmissions right

1. In accordance with article 16(2c) of FCA Regulation there shall be no restrictions on the access to purchase LTTRs that lead to undue discrimination of access to purchase LTTRs or undue restrictions in competition between purchasers of LTTRs in the auctions of LTTRs.
2. All market players shall be given access to purchase LTTRs if they fulfil the general condition set out in Chapter 2 and 3 of the HAR.

Article 6

Methodology for the validation of cross-zonal capacity allocated as LTTR's for long term time frame

Baltic CCR TSOs shall perform the validation of amount of LTTRs on its bidding zone border(s) to ensure that the results of regional calculation of LTTRs and splitting between time frames will ensure operational security. When performing the validation, the TSO shall consider operational security, taking into account new and relevant information obtained during or after the most recent capacity calculation.

TITLE 3

Miscellaneous

Article 7

Publication of data

1. The TSOs shall, in compliance with Article 47 of the FCA Regulation and in accordance with Article 3(f) of the FCA Regulation, and in addition to the data items and definitions of Transparency Regulation, publish data regarding the LTTR auctions on a regular basis and as soon as possible.
2. The publication of the data referred to in paragraph 1 can be done on behalf of the TSOs on SAP's web page.

Article 8

Capacity calculation process

1. Within the capacity calculation process, reduction periods may be defined in accordance with HAR Article 30. The reduction periods will not be taken into account when using the LTCS cf. Article 4.

2. When the amount of LTTRs are provided to the SAP for the auction the reduction periods will be included in the final product. This ensures that the final product allocated to the market via the SAP includes reduction periods as given by the capacity calculation process.

TITLE 4

Final provisions

Article 9

Publication and Implementation

1. Baltic CCR TSOs shall publish the LTCS without undue delay after the Baltic CCR NRAs has approved the LTCS or a decision has been taken by the Agency for the Cooperation of Energy Regulators in accordance with Article 4(9), Article 4(10) and Article (11) of the FCA Regulation regarding the methodology.

2. The methodology will be implemented from the first LTTR auction after the Baltic CCR NRAs has approved the LTCS or a decision has been taken by the Agency for the Cooperation of Energy Regulators in accordance with Article 4(9), Article 4(10) and Article 4(11) of the FCA Regulation regarding the methodology, and after the implementation of the Long-term CCM of Baltic CCR.

Article 10

Language

The reference language for this LTCS shall be English. For the avoidance of doubt, where TSOs need to translate this LTCS into their national language(s), in the event of inconsistencies between the English version published by TSOs in accordance with Article 4(13) of the FCA Regulation and any version in another language, the relevant TSOs shall be obliged to dispel any inconsistencies by providing a revised translation of this LTCS to their relevant national regulatory authorities.