

Response to the amended Nordic methodology on splitting long-term cross-zonal capacity by Energinet

Brussels, 03 October 2025

Detailed comments

We would like to reiterate key messages concerning Long-Term Flow Based Allocation. Our main concerns are: uncertain economic efficiency gains, risk of border capacity competition leading to insufficient available capacity, and high collateral requirements reducing bidding and distorting optimal capacity use.

Regarding the proposed amendment, we stress the necessity of a clear implementation plan. We require a defined timeline, with a public and detailed plan for both the Long-Term Flow-Based Capacity Calculation Methodology (LT FB CCM) and the Allocation Mechanism.

We also seek clarification on whether temporary Long-Term rights products can be offered until the Long-Term Flow-Based Allocation is ready, or a clear explanation as to why this would not be possible. From a trading perspective, it is important to us that the product is introduced, and naturally, the sooner the better.

Contact

Coline Gailleul
Electricity Policy Associate
c.gailleul@energytraderseurope.org