# CONSULTATION RESPONSE



### **Core 5th amendment of the Intraday Flow-based Capacity Calculation Methodology**

Brussels, 15 October 2025

#### **General comments**

Energy Traders Europe welcomes the opportunity to provide comments regarding the Core CCR data quality. The use of minimum capacity (minRAM) remains necessary during the interim period and until the advent of Regional Operational Security Coordination (ROSC).

### **Advance hybrid coupling**

Advanced Hybrid Coupling (AHC) should avoid adding to much complexity on the algorithm that would risk the introduction of flow-based in IDAs. In accordance with Art.3(d) of the CACM Regulation, TSOs and NEMOs should optimize the calculation and allocation of cross-zonal capacity. In this regard, the implementation of FB allocation in IDAs will enable to provide more capacities for trading in ID.

#### **Allocation constraints**

A cost-benefit analysis of the impact of Irish and Polish allocation constraints on the whole Core region and its bidding zone should be performed. This impact assessment should also monitor all indicators of the SIDC algorithm. It is important to have a view on when allocation constraints can be removed, given the new initiatives in Poland to procure balancing capacity (balancing auction in the morning and PICASSO).

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#### 110kV network elements in final CNEC list

The inclusion of elements of the 110 kV network in the final CNEC list must be strictly restricted and sufficiently substantiated. TSOs shall clearly and transparently indicate the reason for such inclusion and the duration thereof.

Such inclusions shall not be permanent and shall be justified by appropriate assessments.

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