# CONSULTATION RESPONSE



# Amendments to the Fallback procedures for Italy North Capacity Calculation Region (CCR)

Brussels, 12 December 2025

### **General comments**

We welcome the Italy North TSOs plan to amend the Regional Shadow Allocation Rules for the Italy North CCR in order to merge them with other Shadow Allocation Rules currently applied across Europe into one set of Shadow Allocation Rules.

We have been supportive for some time now of granting the day-ahead coupling process more time to improve its resilience and the capacity of the algorithm to find the most optimal solutions. The proposal to shift the shadow auction results publication deadline from D-1 14h00 to D-1 14h20 seems to indicate a move in that direction by granting more time to the "standard" coupling process. However, the proposal seems to have been deleted or merged in this new proposal.

In general, it would be useful to incorporate the graphic representation of the processes in case of decoupling in the Italy North CCR fallback procedures as described in the fallback manual published by all NEMOs and TSOs<sup>1</sup>.

#### 1) Shadow auction:

- ▶ In case of risk of decoupling for an entire bidding zone, MPs can revise and update their offers to participate in the Shadow Auction at JAO. JAO will indicate the bid submission deadline.
- The order books will be re-opened for MPs to update their submitted offers. MPs will know the results from the Shadow Auction before the order book process will be closed
- Main timings:
  - Final confirmation 10 minutes: 12:55 13:05
  - Deadline for PD: 13:00
  - Deadline for FD: 14:20
- Order books will be reopened as follows:
  - in a PD case, for 15 minutes and in a FD case, for 15 minutes
- Publication time: ASAP from 15:00
- Nomination deadline is postponed to 15:30

#### 2) Partial decoupling

- ▶ PD 1 Partial Decoupling for CZC-related reasons 11:30 deadline
- ▶ PD 2 Partial Decoupling for reasons not related to the CZCs 13:00 deadline
- ▶ PD 3 Partial Decoupling known in advance 10:30 deadline

#### 3. Full Decoupling cases

- ▶ FD1 Full Decoupling known during the Market Coupling Session 14:20 deadline and
- ► FD2 Full Decoupling known in Advance 10:30 deadline

<sup>&</sup>lt;sup>1</sup> https://www.nemo-committee.eu/assets/files/sdac-fallback-manual.pdf

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### **Detailed comments**

Whereas 2: we suggest removing the rules specific to the Slovenia–Italy border to reflect the changes made in the fallback procedures.

Article 1: The Italy North fallback procedure should be amended to read "are the procedures to ensure a single price per bidding zone; efficient, transparent and non-discriminatory cross-border capacity allocation and clear dispatch and scheduling signals in case of partial or full decoupling".

Art. 2: we suggest checking whether the NO2-NL and NO2-DE of the CCR Hansa should be part of this Italy North fallback procedures.

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