

CONSULTATION RESPONSE



Response to the amended Nordic Capacity Calculation Region Day-ahead and Intraday capacity calculation methodology

Brussels, 16 March 2026

Detailed comments

We welcome the opportunity to provide feedback on the Nordic TSOs' amendments to the Nordic Capacity Calculation Region Day-ahead and Intraday Capacity Calculation Methodology.

[Article 2 Definitions and interpretation](#)

No comment.

[Article 3 Methodology for determining reliability margin](#)

We reiterate the need for transparency and clarity towards market participants. We had previously flagged in Article 3 (5) the risk of leaving open the possibility of applying different risk levels for different constraints, as well as the need for clarity on the method and criteria. We welcome the introduction of more coordinated risk level criteria, with the 95% risk level value.

[Article 4 Methodology for determining operational security limits](#)

Transparency on the reasons behind the implementation of operational security limits on network lines is crucial for market participants, as it directly impacts the functioning of the market and cross-border trading.

[Article 5 Methodology for determining critical network elements and contingencies relevant to capacity calculation](#)

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We've always supported making as much capacity as possible available for cross-zonal exchanges. The minimum 70% rule is a starting point for this implementation, and it is essential to go beyond that minimum threshold.

[Article 6 Methodology for allocation constraints](#)

No comment.

[Article 7 Combined dynamic constraints](#)

We raise a reminder point about the use of IVAs that they should be used when necessary and not excessively.

[Article 8 Methodology for determining generation shift keys \(GSKs\)](#)

In the previous CCM proposal, we had requested full transparency on the GSK methodologies. We are opposed to vague elements such as "custom" GSK. A fully transparent and prescriptive methodology should be adopted. In addition, having operational transparency on GSKs, i.e. the value per node and per hour.

[Article 9 Rules for avoiding undue discrimination between internal and cross-zonal exchanges](#)

We fully support the principle behind this article. The minimum 70% rule and providing beyond that minimum threshold for available capacities are essential. We've also previously highlighted that undue discrimination may only be avoided if there is a clear justification - based on an economic efficiency assessment - for the selection of internal network elements as critical network elements.

[Article 10 Methodology for determining remedial actions \(RAs\) to be considered in capacity calculation](#)

We agree with the removal of the bidding zone review process from this article and reiterate the need to provide as much capacity as possible through and beyond the minimum 70% threshold for available capacity.

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[Article 12 Description of the applied capacity calculation approach with different capacity inputs](#)

We also call for a common grid model to be used, and understand the TSO argument for the need for good quality and reliability of the model. It is good to start now with a regional model and implement the pan-EU level model once it is ready.

[Article 14 Definition of the final list of CNECs for day-ahead and intraday capacity calculation](#)

Concerning the new wording "may/shall" on the removal of CNECs (not applying to those reflecting bidding zone borders), we wonder if it will bring more flexibility or uncertainty, which should be monitored.

[Article 18 Rules for sharing the power flow capabilities of CNECs among different CCRs and third countries](#)

We support the implementation of advanced hybrid coupling on interconnectors and would appreciate clarification on the timeline when it is available. We also welcome the removal of the previous Article 18(2), as well as consideration of interconnection impacts between different CCRs and third countries.

[Article 20 Transitional solution for calculation of intraday cross-zonal capacities in the Intraday timeframe](#)

We encourage the implementation of flow-based intraday as soon as possible, notably the rapid introduction of flow-based in intraday auctions. Further flow-based implementation in the other timeframes (intraday continuous and balancing) should be first discussed with market participants.

We also had a question on whether the CCM states the frequency at which capacity will be reassessed in the ID timeframe.

[Article 24 Reviews and updates](#)

We emphasise support of the consultative process that involves market participants.

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[Article 26 Publication and Implementation](#)

We encourage publication of changes to be accompanied by a clear timeline, with a sufficient time lead for implementation.

[Additional](#)

While it is not an article with proposed amendments, we also flag additional elements for Article 25 on the publication of data. To improve resource utilisation, better forecasts and more comprehensive Nordic grid data, both short-term TSO forecasts and long-term grid models, are required. Which is why we would welcome the publication of

1. A forecast of flow-based parameters for the next 10 days, updated on a daily rolling basis.
2. A Nordic grid model made available to stakeholders engaged in production optimisation, similar to the model available in the Core region.

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