

CONSULTATION RESPONSE



Response to ACER's public consultation on amendments to Europe's electricity capacity calculation regions

Brussels, 2 September 2025

Questions

Do you have any comments regarding the proposed merger of Core CCR and Italy North CCR into the Central Europe CCR for intraday capacity calculation, as well as for ROSC, RDCT and RDCT CS?

We welcome the Roadmap for a full merger of Italy North into the CE CCR. Integration into larger regions brings additional benefits in the form of improved grid security and cross-border capacity availability.

Furthermore, we would like to mention our support for integrating „buffer regions“ such as Hansa into larger areas, as full integration down the line was an intended goal when the concept of CCR was introduced as an interim stage.

Do you have any comments regarding the proposed determination of CCRs which incorporate the bidding zone borders and the TSOs of the Energy Community Contracting Parties (EnC CPs) and neighbouring EU countries?

We support the proposal to include the capacity calculation regions of the Energy Community Contracting Parties (although newly established CCRs will only exist during the interim period until full integration into the CE CCR) and neighbouring countries. Including non-EU TSOs in capacity calculation improves system security, as these flows directly influence the European grid and create more cross-border trading opportunities, thereby increasing social welfare.

We would further like to reiterate our support for coordinating with TSOs from Switzerland and the UK. While we recognise the political complexities involved, further coordination in the future is essential for efficient cross-border electricity trading and to ensure system security.

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