

Response to All TSOs' proposal for amendment of the Determination of capacity calculation regions methodology

Brussels, 13 June 2025

General comment :

As Energy Traders Europe, we welcome the opportunity to provide feedback on the ENTSO-E Capacity Calculation Regions amendments. Overall, we support enhanced regional coordination, as this may lead to increased cross-border trading capacities, yielding greater economic and societal benefits while furthering European market integration, including outside the borders of the European Union.

In this light, we support the current proposal to incorporate the capacity calculation regions of the Energy Community Contracting Parties (while newly created CCRs will only exist during the interim period until full integration into the CE CCR) and the neighbouring countries. Including non-EU TSOs in capacity calculation enhances system security, as these flows have a direct impact on the European grid and provide more cross-border trading opportunities, thereby increasing social welfare.

We also welcome the Roadmap for a full merger of Italy North into the CE CCR, as integration into larger regions brings additional benefits.

We would like to reiterate our position regarding „buffer regions“ (Hansa) as interim solutions, progressively being integrated into larger areas. In this light, we would welcome the integration of these „buffer zones“ into larger regions during the review of CCR delineations of Hansa, Core, and Nordics. We remind that the development of the methodologies at CCR was intended as an interim stage towards a harmonisation at a later stage.

Furthermore, these reviews should occur more periodically (every 4-5 years), accompanied by a comprehensive impact assessment of the current situation and potential changes.

CONSULTATION RESPONSE



Other Comment :

While we welcome the proposed system integration with non-EU TSOs from the Balkan Region and Energy Community contracted parties, we emphasise the necessity of coordinating with all non-EU TSOs, including Switzerland and the UK. We believe that the forthcoming proposals should encompass those borders, which are crucial for the proper functioning of the internal energy market. We recognise the political complexities involved, but to ensure system security and facilitate smooth and efficient cross-border electricity trading, further coordination is essential.

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