CONSULTATION RESPONSE

Response to Regional Specific Annex for the CCR Core to the Harmonised Allocation Rules for long-term transmission rights in accordance with Article 52 of Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a Guideline on Forward Capacity Allocation

Brussels, 20th October 2025

Response

As Energy Traders Europe, we welcome the inclusion of the Single Electricity Market of Ireland and Northern Ireland (SEM) in the HAR regional annex. We recognise the technical requirements and challenges involved in commissioning and integrating the SEM-FR interconnector.

To help market participants prepare and adjust their strategies, we strongly urge the Core TSOs and regulators to provide a clear and transparent timeline for the commissioning and start of operations of the SEM-FR border.

Additionally, timely communication and advance notice of any developments or changes are essential to maintaining market confidence and supporting efficient market functioning. We note the TSOs' request, at HDVC borders in the Core CCR (SEM-FR and BE-DE), that LTTRs where reduction periods have been applied may only be returned when the returned rights contain the same Reduction Period(s) as the subsequent auction.

However, to promote transparency and consistency, we encourage the Core TSOs and regulators to clearly explain how these deviations will be implemented in practice, including any potential impacts on market participants' rights and obligations.

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