

Public consultation on **CACM 2.0**

Fields marked with * are mandatory.

This consultation aims to gather views, feedback and input from all stakeholders on proposed reasoned amendments for the ACER recommendation to the European Commission for the amendments of the Regulation (EU) 2015/1222 establishing a guideline on capacity allocation and congestion management ('CACM Regulation').

This consultation is addressed to all interested stakeholders including market participants, transmission system operators, nominated electricity market operators, consumers, end-users and, where relevant, competition authorities. The feedback to the consultation will inform ACER in preparing the final recommendation to the European Commission.

Replies to this consultation should be submitted by 10 June 2021 23:59 hrs (CET).

General terms of the consultation

Objective

This consultation aims to gather views and information from stakeholders on proposed reasoned amendments to the the Commission for the amendments of the Regulation (EU) 2015/1222 establishing a guideline on capacity allocation and congestion management ('CACM Regulation').

On 22 January 2020 ACER has been requested by the European Commission to provide a recommendation on reasoned amendments to the CACM Regulation in accordance with Article 60(3) of the Regulation (EU) 2019/943 on the internal market for electricity ('Electricity Regulation').

The objective of this consultation is to gather views and information from all stakeholders. The feedback to the consultation will inform ACER in preparing the final recommendation to the European Commission.

As the survey is long,

1. you have the possibility to edit your answer after submission. When clicking on "submit", you will be given a contribution ID, which you can then use to access your contribution [here](#). This allows you to proceed in steps.
2. we kindly suggest that you download questions as .pdf (link on the right), prepare your answers then upload them at once, to avoid a session timeout on submission. Thank you for your kind understanding.

The maximum length of each cell is 5000 characters. This is the maximum technical limit set by the EUsurvey tool, which cannot be increased.

Background

At the Florence Forum on 7 December 2020 the European Commission has invited ACER to prepare reasoned proposals for amendments to the CACM Regulation. Prior to that, the preparation for drafting of CACM Regulation amendments had been largely informal in nature and several topics were discussed.

The preparation on the topics of MCO governance, cost recovery and single day-ahead and intraday coupling started with the establishment of the MCO Governance Group in 2018. The group is chaired by the European Commission and consists also of ACERs', NRAs', NEMOs' and TSOs' representatives. The objective of the group was to discuss possible improvements of the CACM Regulation with respect to the subjects outlined. It also builds on the European Commission's Report on the development of single day-ahead and intraday coupling in the Member States and the development of competition between NEMOs in accordance with Article 5(3) of the CACM Regulation. Following that report, the NRAs presented in the course of 2019 the three papers on "Efficient MCO governance" developing recommendations, further elaborating the virtual single entity and providing proposals for enhanced amendments of the CACM Regulation. In early March 2020, the European Commission published a report on "Cost sharing and cost recovery arrangements in the European Union in accordance with the CACM Regulation. On the 12th of November 2020, the European Commission organised the latest MCO governance group to gather input from stakeholders on the subject and to announce the next steps towards the CACM amendment.

On the topics related to capacity calculation and remedial actions, the input to the scoping phase has mainly been gathered by ACER and NRAs during the development and implementation of the determination of capacity calculation regions, common grid model methodology, the regional day-ahead and intraday capacity calculation methodologies, and the regional methodologies on coordinated redispatching and countertrading and related cost sharing pursuant to the CACM Regulation.

On the topics related to the bidding zone review, the input to this scoping phase is twofold. First, it aims to align the CACM Regulation with the principles and governance envisaged in the Electricity Regulation regarding the bidding zone review process. Second, taking stock of the lessons learnt during the development and adoption of the bidding zone review methodology and configurations, the proposed scope for amendments of the CACM Regulation aims to seek ways to streamline the requirements envisaged for the bidding zone review methodology, while ensuring consistency with the Electricity Regulation.

Based on the results of the preparations described above, and confirmed by a feedback received from stakeholders in the Market European Stakeholders Committee's meeting on 14 December 2020, ACER proposed the general improvements to the CACM Regulation and different scoping areas for amending the CACM Regulation (references to existing CACM regulation):

- General improvements
- MCO Governance (Title I Art 7-10, Title II, Ch7)
- Single day-ahead and intraday coupling (Title II, Ch4-6)
- Costs & Congestion Income distribution (Title II, Ch8, Title III ex. Art 74)
- Capacity Calculation (Title II, CH1 (Art 14-31))

- Remedial Actions (Title II, Ch3 (Art 35, 74))
- Bidding Zone Review (Title II, Ch2 (Art 32-34))

On 20 January the European Commission has acknowledged the outcome of the scoping phase and asked ACER to prepare reasoned recommendations for amendments to the CACM Regulation in line with Article 60(3) of the Regulation (EU) 2019/943. Delivery of this recommendation to the European Commission is expected by autumn 2021.

In this letter the Commission also confirmed that limited changes to the Commission Regulation (EU) 2017/1485 establishing a guideline on electricity transmission system operation and the Commission Regulation (EU) 2017/2195 establishing a guideline on electricity balancing could be considered as far as intrinsically linked to the changes under discussion for the CACM Regulation.

Legal Framework

Pursuant to Article 60(1) of the Electricity Regulation the Commission is empowered to amend the network codes within the areas listed in Article 59(1) and (2) in accordance with the relevant procedure set out in that Article. In addition, this article states that ACER may also propose amendments to the networks codes in accordance with Article 60(2) and (3) of the Electricity Regulation.

Pursuant to Article 60(3), the first sentence states that ACER may make reasoned proposals to the Commission for amendments, explaining how such proposals are consistent with the objectives of the network codes set out in Article 59(4) of this Regulation. Pursuant to this article, these amendments shall be assessed whether they contribute to market integration, non-discrimination, effective competition, and the efficient functioning of the market.

Article 1 of the current CACM Regulation describes these objectives in more details:

- promoting effective competition in the generation, trading and supply of electricity;
- ensuring optimal use of the transmission infrastructure; ensuring operational security;
- optimising the calculation and allocation of cross-zonal capacity;
- ensuring fair and non-discriminatory treatment of TSOs, NEMOs, the Agency, regulatory authorities and market participants;
- ensuring and enhancing the transparency and reliability of information;
- contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union;
- respecting the need for a fair and orderly market and fair and orderly price formation; creating a level playing field for NEMOs;
- providing non-discriminatory access to cross-zonal capacity.

Pursuant to Article 60(3), the second sentence states that where ACER considers an amendment proposal to be admissible and where it proposes amendments on its own initiative, it shall consult all stakeholders in accordance with Article 14 of Regulation (EU) 2019/942.

Pursuant to Article 14(1) ACER shall [...] in the process of proposing amendments of network codes under Article 60 of Regulation (EU) 2019/943 [...] extensively consult at an early stage market participants,

transmission system operators, consumers, end-users and, where relevant, competition authorities, without prejudice to their respective competence, in an open and transparent manner, in particular when its tasks concern transmission system operators.

This public consultation is performed with the objective of providing input to a recommendation on reasoned amendments on the CACM Regulation in accordance with Article 60(3) of the Electricity Regulation, in accordance with Article 2(c) of the ACER Regulation and which was requested by the European Commission.

Related documents

Legislation and guidances note:

- [Regulation \(EU\) 2019/942 of the European Parliament and of the Council of 5 July 2019 establishing a European Union Agency for the Cooperation of Energy Regulators \(recast\)](#)
- [Regulation \(EU\) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity \(recast\)](#)
- [Commission Regulation \(EU\) 2015/1222 of 24 July 2015 establishing a Guideline on Capacity Allocation and Congestion Management \(CACM Regulation\)](#)
- [ACER Guidance Note on Consultations](#)
- [EC Report on the development of single day-ahead and intraday coupling in the Member States and the development of competition between NEMOs \(5\(3\) CACM\)](#)

ACER scoping letter to EC and EC letter to ACER

[Letter to EC 201223 CACM 2.0 amendment scoping phase.pdf](#)
[20210120 Letter to ACER CACM amendments.pdf](#)

Introduction to the consultation

Consultation approach

The starting premise for this consultation is that it consults all stakeholders on proposed amendments. These amendments are provided in separate files linked to in each section of the consultation. These amendments are the result of the drafting phase conducted by ACER and EU NRAs together in the first quarter of 2021 and based on the interactions with TSOs and NEMOs in the preceding years during the implementation of the CACM Regulation.

Each amendment file includes two columns showing current CACM Regulation text on the left and the proposed new text with amendments and deletions in track change (bold for insertions and #/hidden for deletions) on the right. The amendment files also include the reasoning(s) for the amendments provided. The source word-files are provided separately for your convenience under the download section below.

The consultation itself requests stakeholders to provide feedback in two ways for each section of the (new) CACM regulation:

- Obligatory input on

- general opinion on the proposed amendments per article ranging from strong disagreement to strong agreement or no opinion;
- whether the reasoning is considered sufficient;
- how the proposed amendments contribute to the achievement of the objectives pursuant to Article 59(4) [market integration, non-discrimination, effective competition, and the efficient functioning of the market]; and
- Under the 'summary' tab, stakeholders are requested to signal the importance of each of the new sections in the (new) CACM regulation;
- Optional input to
 - Provide additional consideration on the reasoning provided;
 - Provide additional proposals for amendments including reasoning for each article.

Although this approach requires stakeholders to provide their position on all amendments and in a more closed manner we hope that this approach provides a lower entry barrier to participation while at the same time allowing other stakeholders to make detailed suggestions. In the obligatory section stakeholders always have the choice of 'no opinion' if they have none. ACER also considers that this approach allows it to quickly process the input to the consultation, providing publicly at an aggregate level, the direction coming from this consultation.

ACER welcomes all stakeholders to take part in this consultation and provide their feedback in order to be able to provide a well-balanced recommendation on a new CACM regulation taking into account the stakeholders views.

Proposed structure of the new CACM regulation

For the purpose of this consultation - and in the process of drafting amendment - ACER and NRAs have elaborated a new and improved structure of the CACM regulation whereby the different elements of the regulation would be structured into a number of new titles, chapters and sections. The picture below provides a visual overview of the new structure and provides detailed correlation tables from old to new and vice versa.

The new CACM regulation would be structured in seven titles and a separate section for new SO regulation amendments:

- TITLE I - GENERAL PROVISIONS
- TITLE II – ORGANISATION OF MARKET COUPLING & OF CAPACITY CALCULATION
- TITLE III – CAPACITY CALCULATION
- TITLE IV – MARKET COUPLING
- TITLE V – BIDDING ZONE REVIEW PROCESS
- TITLE VI - REPORTING & IMPLEMENTATION MONITORING
- TITLE VII - TRANSITIONAL AND FINAL PROVISIONS
- SO REGULATION amendments

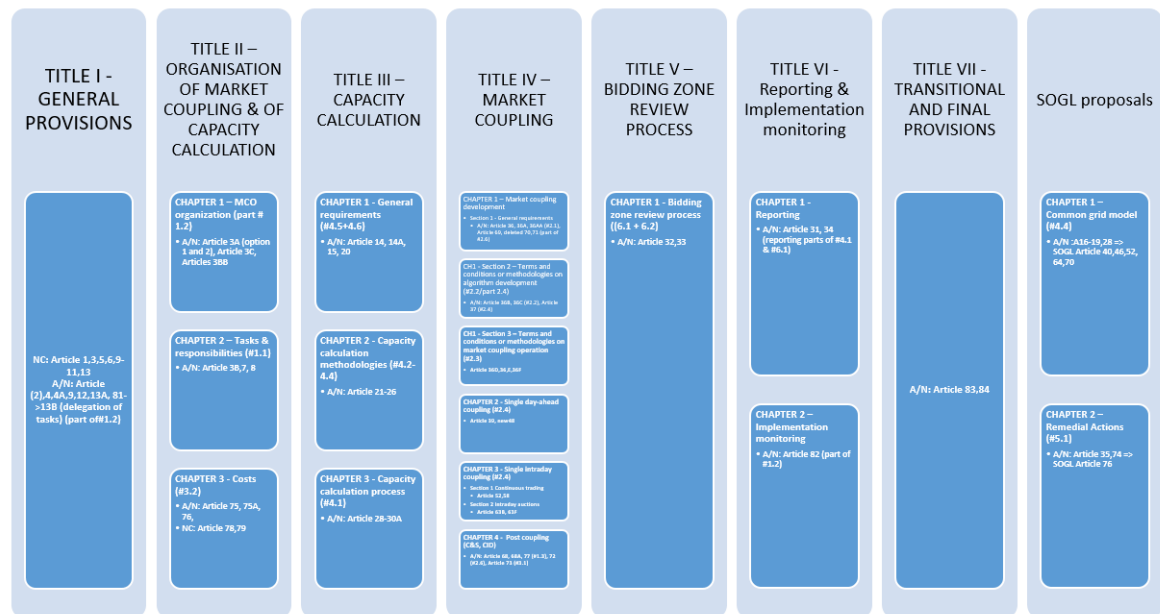
Note: the proposed amendments to SOGL result directly from the CACM amendment changes where those

provisions seem more suitable to be included in the already existing and corresponding framework in that Regulation. The EC letter requesting ACER to draft a recommendation provides explicitly for this possibility. [see under related documents]

Under the links below you will find two correlation tables showing the link between the existing (old) CACM regulation and the proposed (new) CACM regulation ordered each way:

[210415_correlation_table_v2.0_new_to_old.pdf](#)

[210415_correlation_table_v2.0_old_to_new.pdf](#)



Would you like to provide any comments on the proposed structure?

Options in the draft amendments

In the the proces of drafting the amendments by ACER and NRAs, there were areas where there are two different proposed amendments (options). Because these optional amendments are sometimes interrelated or only deal with a specific paragraph they are listed below for clarity. Questions on these options are included as separate questions under each respective section.

Title II MCO & Title IV Market coupling (Decentralized vs Centralized)

- II.1 MCO organisation (Article 3A)
 - O1: multiple entities performing MCO tasks
 - O2: Legal Single Entity as MCO
- II.2 Tasks and responsibilities (Article 3B)
 - O1: clear allocation of tasks to MCO + some tasks to TSOs and NEMOs
 - O2: all tasks on the MCO
- II.3 Costs (Article 75A)
 - O1: decentralized cost recovery
 - O2: centralized cost recovery

- IV.4 post coupling (Article 68/68A)
 - O1: clearing and settlement BRP on each NEMO/ / Congestion income distribution on each TSO
 - O2: clearing and settlement /BRP(XB) Congestion income distribution done by MCO

Title III Capacity Calculation

- III.2 Capacity calculation inputs on reliability margins (Article 22(5)):
 - O1:FRM per CNEC for both CNTC and FB
 - O2:TRM for CNTC vs FRM for FB
- III.3 Capacity Calculation process (Article 28(6)&(7)):
 - O1: ACER proposal including minRAM/70% as in Core CCM & CTNC built on FB
 - O2: only general 70% requirement

Title VI Bidding Zone Review

- Content of technical report (Article 34.2)
 - O1: include threshold for reporting on physical congestion
 - O2: no explicit threshold

SOGL proposals

- SOGL.1 CGM - Best forecast (Article 67(3) & 70(3)):
 - O1 Keep current CACM text in SOGL
 - O2 Inclusion of best forecast of RAs in CGM
- SOGL.2 RDCT cost sharing (article 76.4)
 - O1: Keep current CACM text in SOGL
 - O2: adapted text in line with ACER decisions on RDCT cost sharing

Amendment files for download

Please find below for download the full amendment files in word track change format for your convenience.
The pdf documents in the survey are created from these word-files

[Title I II.zip](#)

[Title III.zip](#)

[Title IV.zip](#)

[Title V VI VII.zip](#)

[Title X SOGL.zip](#)

Contact details

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Italy

* Should the following answers to this public consultation be treated as confidential?

- ☒ Yes
☐ No

ACER will publish all non-confidential responses. It will process personal data of the respondents in accordance with Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data, taking into account that this processing is necessary for performing ACER's consultation task. For more details on how the contributions and the personal data of the respondents will be dealt with, please see [ACER's Guidance Note on Consultations](#) and the specific privacy statement referred to this consultation.

Countries where your company is active

Italy

* Activity

Utility (or association)

TITLE I - General provisions

Download

[210413_PC_AM_I_General_provisions_final.pdf](#)

Amended/New articles:

- Article 1 Subject matter and scope
- Article 2 Definitions
- Article 4 NEMOs designation and revocation of the designation
- Article 4A Last resort NEMOs service provider (options in this article depend on options under II.1)
- Article 5 NEMOs designation in case of a national legal monopoly for trading services
- Article 9 Adoption of terms and conditions or methodologies
- Article 12 Consultation
- Article 13A Publication of information

- Article 13B Delegation of tasks

No changes to articles:

- Article 3 Objectives of capacity allocation and congestion management cooperation
- Article 6 NEMO designation criteria
- Article 10 Day-to-day management of the single day-ahead and intraday coupling
- Article 11 Stakeholder involvement
- Article 13 Confidentiality obligations

I What is your opinion on the proposed amendments?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 4	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 4A	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 5	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 9	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 12	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 13A	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 13B	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* I Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☒ Yes
☐ No opinion

I Please provide your (additional) consideration on the reasoning if necessary.

In Article 2, a clear definition of uniform pricing and of non-uniform pricing should be added for sake of clarity if such a new approach was introduced because it is not defined in other Regulation or Methodology. If needed, a definition of uplifts and downlifts introduced by non-uniform pricing models should be added as well.

In Article 13A, transparency should be improved.

I How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* I Do you want to provide a different proposal?

☒ Yes

☐ No

I Please write your amendment proposal and the reasoning in the table below. You can also provide amendments for articles for which no amendments are proposed.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 1		
Article 2		
Article 3		
Article 4		
Article 4A		
Article 5		
Article 6		
Article 9		
Article 10		
Article 11		
Article 12		
Article 13A	<p>4d. by each NEMO as soon as it becomes available the most up-to-date information related to:</p> <p>i. after the orders are matched, all the blocks with their status of execution and prices per trade produced by each SDAC and SIDC algorithm, including all details of complex orders (exclusive, linked, family, etc.) in an easily accessible format</p> <p>the information on aggregated bid/offer curves (with executed volumes and prices) from SDAC and SIDC in an easily accessible format for at least 5 years, including all executed orders (both simple and complex), for each bidding zone</p>	<p>NEMOs should publish per bidding zone and for DA and IDA:</p> <ul style="list-style-type: none">one file with the blocks, including all details of complex orders (exclusive, linked, family, etc...), details about the execution (or not) of the blocks, and pricesone file with the bid/offer curve, with executed volumes and prices <p>Elettricità Futura suggests the publication of the aggregated bid curves (for DA and IDA), including complex orders, at a bidding zone level in order to improve transparency.</p>
Article 13B		

TITLE II - Organisation of market coupling and of capacity calculation

Chapter 1 - MCO organisation

Download

[210413_PC_AM_II.1_MCO_Organisation_final.pdf](#)

Amended/New articles:

- Article 3A MCO governance principles
 - Option 1 - Multiple entities performing MCO tasks
 - Option 2 - Legal Single Entity as MCO
- Article 3C MCO plan
- Article 3BB Assignment of MCO operational tasks

II.1 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 3A Option 1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 3A Option 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 3C	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 3BB	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* II.1 Do you consider the reasoning for the amendment sufficient?

- ☐ No
- ☐ Neutral
- ☐ Yes
- ☒ No opinion

II.1 Please provide your (additional) consideration on the reasoning if necessary.

Elettricità Futura requests an improvement of the involvement of market participants in the MCO governance. Modifying MCO governance in CACM GL gives this opportunity.

Elettricità Futura notes that market participants are currently excluded from the MCO governance. CACM should mandate that the interests and constraints of all users of the electricity system should be considered in the decisions related with the MCO function, which should not favour some stakeholders to the detriment of others. This has not been the case until now.

Even though the MCO organisation already involves stakeholders in terms of reporting and information, e.g. through the regular Market European Stakeholder Committees (MESC) meetings, it is necessary to go further with the participation of representatives of the market participants in the MCO governance.

Elettricità Futura requests that representatives of market participants should participate to the MCO governance and be able to voice preferences in the governance body of the MCO function. More stakeholder involvement is required in the strategic decisions on the MCO function.

Article 11 “Stakeholder involvement” (which is not subject to amendments in current ACER proposal) should be modified according. Concretely, we ask for:

- the official launch of a “MCO consultative group” on European DA and ID market coupling implementation with the participation of all stakeholders (NEMOs, TSOs and representative of market participants) with a governance and organization model similar to the one set in the CORE consultative group (in particular, regular meetings and chair and vice-chair rotating among stakeholders);
- the organization of regular meetings, four times a year, of a “MCO advisory council”, with the participation of all stakeholders, to share and discuss in upstream strategic decisions on the MCO function.

II.1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article 59(4) of the Electricity Regulation?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* II.1 Do you want to provide a different proposal?

☐ Yes

☒ No

II.1 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 3A Option 1		
Article 3A Option 2		
Article 3C		
Article 3BB		

Chapter 2 - Tasks and responsibilities

Download

[210413_PC_AM_II.2_Tasks_and_responsibilities_final.pdf](#)

Amended/New articles:

- Article 3B MCO tasks (options in this article depend on options under II.1)
- Article 7 NEMO tasks
- Article 8 TSOs' and RCCs' tasks related to single day-ahead and intraday coupling

II.2 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 3B	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 7	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 8	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* II.2 Do you consider the reasoning for the amendment sufficient?

- ☐ No
- ☐ Neutral
- ☒ Yes
- ☐ No opinion

II.2 Please provide your (additional) consideration on the reasoning if necessary.

II.2 How do the proposed amendments contribute to the achievement of the objectives pursuant the article 59(4) of the Electricity Regulation?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* II.2 Do you want to provide a different proposal?

- ☐ Yes
☒ No

Chapter 3 - Costs

Download

[210413_PC_AM_II.3_MCO_function_costs_final.pdf](#)

Amended/New articles:

- Article 75 TSO costs
- Article 75A MCO costs (options in this article depend on options under II.1)
- Article 76 Costs of establishing, amending and operating single day-ahead and intraday coupling (proposed to be deleted)

No changes to articles:

- Article 78 Costs of establishing and operating the coordinated capacity calculation process
- Article 79 Costs of ensuring firmness

II.3 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 75	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 75A	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 76	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* II.3 Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☐ Yes
☒ No opinion

II.3 Please provide your (additional) consideration on the reasoning if necessary.

II.3 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* II.3 Do you want to provide a different proposal?

- ☐ Yes
☒ No

TITLE III - Capacity calculation

Chapter 1 - General requirements

Download

[210413_PC_AM_III.1_CC_general_requirements_final.pdf](#)

Amended/New articles:

- Article 15 Capacity calculation regions
- Article 15A General capacity calculation provisions
- Article 20 Capacity calculation approach

III.1 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 15	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 15A	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 20	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* III.1 Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☒ Yes
☐ No opinion

III.1 Please provide your (additional) consideration on the reasoning if necessary.

III.1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* III.1 Do you want to provide a different proposal?

- ☐ Yes
☒ No

Chapter 2 - Capacity calculation methodologies

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Amended/New articles:

- Article 21 Capacity calculation methodology
- Article 22 Reliability margin methodology
 - Option 1 FRM per CNEC for both CNTC and FB
 - Option 2 TRM/NTC vs FRM/FB
- Article 23 Methodologies for critical network elements, contingencies and operational security limits
- Article 24 Allocation constraints
- Article 25 Generation and load shift keys methodology
- Article 26 Methodology for remedial actions in capacity calculation

III.2 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 21	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 22 Option 1	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 22 Option 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 23	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 24	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 25	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 26	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* III.2 Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☒ Yes
☐ No opinion

III.2 Please provide your (additional) consideration on the reasoning if necessary.

Article 21(3): CACM 2.0 does not make the 70% principle mandatory also in ID because of potential inefficiencies.

Article 22, Option 1 seems to be too complex to be implemented for those CCRs that decide to adopt the cNTC methodology because of low additional benefit in terms of available cross-zonal capacity identified in moving from cNTC to FB approach.

III.2 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* III.2 Do you want to provide a different proposal?

☒ Yes

☐ No

III.2 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
Article 21	3. For the day-ahead timeframe, the capacity calculation methodology shall include the principles to comply with the minimum capacity target set at the minimum level of available capacity for cross-zonal trade pursuant to Article 16(8) of Regulation 2019/943 as modified according to the action plans pursuant to Article 15 of Regulation 2019/943 or the derogations granted by the regulatory authorities pursuant to Article 16(9) of Regulation 2019/943.	Regarding the 70% constraint, CACM should not introduce any additional measure more restrictive than in Electricity Regulation. Therefore, the obligation to comply with the 70% target of the Electricity Regulation should be mandatory only in the day-ahead timeframe.
Article 22 Option 1		
Article 22 Option 2		
Article 23		
Article 24		
Article 25		
Article 26		

Chapter 3 - Capacity calculation process

Download

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Amended/New articles:

- Article 28 Regional calculation of cross-zonal capacity
 - Option 1 Proposal including minRAM/70%+CTNC built on FB
 - Option 2 Only general 70% requirement
- Article 29 Coordinated validation of cross-zonal capacity
- Article 30 Individual validation of cross-zonal capacity
- Article 30A Delivery of cross-zonal capacity
- Article 30B Reports about validation

III.3 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 28 Option 1	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 28 Option 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 29	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Article 30	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Article 30A	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Article 30B	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* III.3 Do you consider the reasoning for the amendment sufficient?

- ☐ No
- ☐ Neutral
- ☒ Yes
- ☐ No opinion

III.3 Please provide your (additional) consideration on the reasoning if necessary.

Article 28, Option 1 seems to be too complex to be implemented for those CCR that adopt the cNTC approach and its implementation requires time and resources from TSOs. Option 2 represents a preferable solution since it allows to keep the cNTC approach in the CCR where this is justified, while improving the monitoring of the 70% rule. Moreover, capacity calculation should remain adapted to regional specificities.

We agree with the amendments to articles from 29 to 30B. In particular, Article 30B (Reports about validation), allows an improvement in transparency since RCC shall report all reductions made during the coordinated and individual validations of cross-zonal capacity. In our view, it is essential that TSOs report and justify all reductions.

III.3 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* III.3 Do you want to provide a different proposal?

- ☐ Yes
☒ No

TITLE IV Part 1 - Market coupling

Chapter 1 - Market coupling development

Section 1 - General requirements

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Amended/New articles:

- Article 36 General provisions
- Article 36A Pricing of cross-zonal capacity
- Article 36AA Algorithm objectives
- Article 36AAA Firmness of day-ahead and intraday capacity

IV.1.1 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 36	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 36A	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 36AA	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 36AAA	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* IV.1.1 Do you consider the reasoning for the amendment sufficient?

- ☒ No
☐ Neutral
☐ Yes
☐ No opinion

IV.1.1 Please provide your (additional) consideration on the reasoning if necessary.

place at the same time. In our view, implicit intraday auctions help maximizing social welfare. Moreover, implicit auctions provide other benefits: they are more scalable, more liquid and easier to manage. For these reasons, a market design encompassing implicit auctions in parallel with continuous trading is a desirable design feature, provided that the correct functioning of both market segments is ensured

In article 36AA(1), c), i), b. ACER opens to the possibility to introduce non-uniform pricing. However, this new pricing method is not sufficiently clear and it should be analyzed in a more detailed manner by ACER itself. An assessment of the impact and the efficiency of this kind of methodology on zonal pricing and market functioning is needed (application of the uplifts and their financing, significance of DA and ID prices, etc.). Indeed, these methodologies raise a set of unresolved issues to date:

- Definition of significant price signals per bidding zones;
- Calibration of the uplifts;
- Payment owners of the uplifts.

Dedicated consultation process or workshop should be organized by ACER to involve stakeholders.

One potential benefit that seems to be related with this mechanism could be the reduction of paradoxically rejected block bids, yet further evidences on this aspect should be provided.

In the following, Elettricità Futura's view on ACER requests:

1. "the consequences of uplifts slightly deviating from the uniform clearing price and the impact on the usage of the DA prices as forward-looking hedging products?"

DA market prices are not only the reference prices for the settlement of forward products used for hedging but also used as an index for a major part of electricity contracts. The consequences depend on the impact in terms of DA price levels and volatilities. If the impact is non negligible, the consequences could be detrimental for market participants and for the global efficiency of the DA and ID markets in terms of zonal price formation and market functioning. Moreover, we ask that the calculation methodology of the (unique) zonal DA and ID prices in output of non-uniform pricing model should be transparent as the way to calibrate the uplifts/downlifts

2. "the fairness of uplifts in general and more specific in comparison to the current design with Paradoxically Rejected Blocks":

Uplifts/down-lifts should be taken in charge by the budget of the MCO function/the network tariff or if they are to be paid by market participants, explicit guarantees on the amount of side-payments should be set.

3. "the balance between introduction of uplift vs the impact on algorithm performance (when introduction uplifts would allow higher welfare and better performance of the SDAC in the long run)"

There is not enough information available to assess the fairness of uplifts the balance between introduction of uplift vs the impact on algorithm performance.

IV.1.1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* IV.1.1 Do you want to provide a different proposal?

- ☐ Yes
☒ No

Section 2 - Terms and conditions or methodologies on algorithm development

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Amended/New articles:

- Article 36B Products accommodated
- Article 36C Harmonised technical price limits
- Article 37 Algorithm methodology

IV.1.2 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 36B	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 36C	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 37	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* IV.1.2 Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☒ Yes
☐ No opinion

IV.1.2 Please provide your (additional) consideration on the reasoning if necessary.

The SDAC implementation and the algorithm development should be conditioned to the demonstration that new releases do not lead to a step back in terms of products available for market participants (with regulation unchanged). As for products accommodated by the price coupling algorithm for SDAC (Art. 40), both simple and existing complex products shall be accommodated to ensure maximum efficiency of the MCO function (see December 2020 ACER Decision on the terms and conditions for day-ahead products that can be used in the day-ahead coupling with the products detailed in Annex I with their category).

Elettricità Futura agrees with the proposed amendments on Article 37 (Algorithm methodology) since the identification in Article 37(3) of a set of minimum elements for the algorithm methodology improves transparency. Consultations and stakeholder involvement are needed for revising existing methodologies.

IV.1.2 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* IV.1.2 Do you want to provide a different proposal?

- ☐ Yes
☒ No

Section 3 - Terms and conditions or methodologies on market coupling operation

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Amended/New articles:

- Article 36E Day-ahead timings and procedures
- Article 36F Intraday timings and procedures

IV.1.3 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 36E	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 36F	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* IV.1.3 Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☒ Yes
☐ No opinion

IV.1.3 Please provide your (additional) consideration on the reasoning if necessary.

IV.1.3 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* IV.1.3 Do you want to provide a different proposal?

- ☐ Yes
☒ No

TITLE IV Part 2 - Market coupling

Chapter 2 - Single day-ahead coupling

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[210413_PC_AM_IV.2 - Single day-ahead coupling_final.pdf](#)

Amended/New articles:

- Article 39 Inputs in the SDAC algorithm
- Article 39A Results of the price coupling algorithm

IV.2 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 39	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 39A	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* IV.2 Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☒ Yes
☐ No opinion

IV.2 Please provide your (additional) consideration on the reasoning if necessary.

IV.2 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* IV.2 Do you want to provide a different proposal?

- ☐ Yes
☒ No

Chapter 3 - Single intraday coupling

Download

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Amended/New articles:

- Article 58 Provision of input data
- Article 58A Results of the continuous trading matching algorithm
- Article 63B Provision of input data
- Article 63F Results of the intraday auction algorithm

IV.3 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 58	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 58A	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 63B	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 63F	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* IV.3 Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☒ Yes
☐ No opinion

IV.3 Please provide your (additional) consideration on the reasoning if necessary.

IV.3 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* IV.3 Do you want to provide a different proposal?

- ☐ Yes
☒ No

Chapter 4 - Post-coupling activities

Download

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Amended/New articles:

- Article 67A Methodology for calculating scheduled exchanges resulting from single day-ahead coupling and single intraday coupling
- Article 68 Clearing and settlement
 - Option 1 Clearing and settlement on each NEMO
 - Option 2 Clearing and settlement on MCO
- Article 68A NEMO balance responsibility
 - Option 1 Balance responsibility on each NEMO
 - Option 2 Balance responsibility (cross-border) on MCO
- Article 72 Firmness in the event of force majeure or emergency situations
- Article 73 Congestion income distribution
 - Option 1 CID on each TSO
 - Option 2 CID on MCO
- Article 77 (proposed to be deleted)

IV.4 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion	Answer 7
* Article 67A	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 68 Option 1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Article 68 Option 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Article 68A Option 1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Article 68A Option 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Article 72	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Article 73 Option 1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Article 73 Option 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Article 77	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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* IV.4 Do you consider the reasoning for the amendment sufficient?

- ☐ No
- ☐ Neutral
- ☒ Yes
- ☐ No opinion

IV.4 Please provide your (additional) consideration on the reasoning if necessary.

IV.4 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* IV.4 Do you want to provide a different proposal?

- ☐ Yes
☒ No

TITLE V - Bidding zone review process

Chapter 1 - Bidding zone review process

Download

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Amended/New articles:

- Article 32 Reviewing existing bidding zone configurations
- Article 33 Criteria for reviewing bidding zone configurations

V.1 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 32	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 33	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* V.1 Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☒ Yes
☐ No opinion

V.1 Please provide your (additional) consideration on the reasoning if necessary.

Stakeholders should be more involved in the preparation of the ENTSO-E technical report on structural congestion and other major physical congestions (Art. 32). Moreover, stakeholders should be also involved in the first step of the review process in order to improve transparency and to better take into account the impacts on electricity market. Elettricità Futura acknowledges an improvement in terms of stakeholders' engagement in Article 32(6)b.

Elettricità Futura does not agree with Paragraph 7, which means that every three years there would be for EC the possibility to change the BZ configuration.

We notice that in art. 33 a partial copy-paste of ER Article 14(8) is used by ACER. With this formulation, this includes provisions about decision-making going further than those in ER whereas those were largely debated during the CEP on ER. We do not agree to include new provisions with respect to those in ER.

The choice for a bidding zone configuration change in a MS is under the prerogative of the concerned MS. EC decision to change bidding zone configuration should be limited to the cases mentioned in ER Article 14 (8) and new borders (if any) should be within the respective Member States. Therefore, we suggest amending Article 33(7) by deleting the last two periods in the text ("In the event that the relevant Member States fail to reach a unanimous decision within six months, they shall immediately notify the Commission. As a measure of last resort, the Commission after consulting the Agency, shall adopt a decision whether to amend or maintain the bidding zone configuration within six months after receipt of such a notification")

V.1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* V.1 Do you want to provide a different proposal?

☒ Yes

☐ No

V.1 Please write your amendment proposal and the reasoning in the table below.

Please note that you won't be able to see the full size of your response in the Survey Tool but once you download the PDF of your response, a full table with your input will be shown.

	Amendment	Reasoning
--	-----------	-----------

Article 32	<p>1(d) [...] This should be assessed after a consultation including NRAs and TSOs concerned, at least in neighbouring countries.</p> <p>5.[...] after a public consultation</p> <p>6.a.</p> <p>(i) The participating TSOs shall develop a proposal for the methodology and assumptions to be used for the specific bidding zone review. Such a proposal shall be in line with the methodology foreseen in Article 14(5) of Regulation 2019/943.</p> <p>(ii) The participating TSOs shall develop a proposal for the alternative bidding zone configurations to be considered for the review.</p> <p>iii) The participating TSOs shall hold a consultation on the proposals on methodology and assumptions to be used for the bidding zone review.</p> <p>(iv) The proposals on methodology and assumptions and alternative bidding zone configurations shall be submitted to the relevant regulatory authorities, no later than three months after the launch of the review. A consultation open to all concerned stakeholders has to be held;</p> <p>(v) the relevant regulatory authorities shall take a unanimous decision within three months. from the receipt by the regulatory authorities, or, where applicable, by the last relevant regulatory authority;</p> <p>(vi) Where the regulatory authorities have not been able to reach agreement within the period referred to in paragraph 4(a)(iv), or upon their joint request, the Agency shall, within additional three months, adopt a decision on the methodology and assumptions and the alternative bidding zone configurations to be considered.</p> <p>7. On receiving the joint proposal to maintain or to amend the bidding zone configuration in accordance with paragraph 6(b)(iv), the relevant Member States or their designated competent authorities shall within six months reach an agreement on the proposal to maintain or amend the bidding zone configuration. The decision shall be reasoned and shall be notified to the Commission and the Agency.</p>	<p>7. We do not agree with ACER about the engagement of the European Commission in the decision on the review of the bidding zone configuration. In our view, such a decision should be under the prerogative of the concerned MS. Therefore, we suggest amending paragraph 7 by deleting the last two periods in the text (“In the event that the relevant Member States fail to reach a unanimous decision within six months, they shall immediately notify the Commission. As a measure of last resort, the Commission after consulting the Agency, shall adopt a decision whether to amend or maintain the bidding zone configuration within six months after receipt of such a notification”)</p>
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Article 33	4. A bidding zone review in accordance with Article 32 shall include scenarios which take due account of tangible progress on infrastructure development projects that are expected to be realised within the period of 10 years starting from the year following the year in which the decision to launch the review was taken	We believe that three years is a too short period to be considered for assessing the effects of network infrastructure development. It would be better to keep the reference to a period of 10 years (consistence with the TYNDP).
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TITLE VI - Reporting and implementation monitoring

Chapter 1 - Reporting

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Amended/New articles:

- Article 31 Biennial report on capacity calculation and allocation
- Article 34 Regular reporting on current bidding zone configuration by ENTSO for Electricity
 - Option 1 Includes threshold for reporting on physical congestion
 - Option 2 No explicit threshold

VI.1 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 31	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Article 34 Option 1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 34 Option 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* VI.1 Do you consider the reasoning for the amendment sufficient?

- ☐ No
- ☐ Neutral
- ☒ Yes
- ☐ No opinion

VI.1 Please provide your (additional) consideration on the reasoning if necessary.

VI.1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* VI.1 Do you want to provide a different proposal?

- ☐ Yes
☒ No

Chapter 2 - Implementation monitoring

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Amended/New articles:

- Article 82 Monitoring of the implementation of single day-ahead and intraday coupling

VI.2 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 82	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* VI.2 Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☒ Yes
☐ No opinion

VI.2 Please provide your (additional) consideration on the reasoning if necessary.

How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Do you want to provide a different proposal?

- ☐ Yes
☒ No

TITLE VII - Transitional and final provisions

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Amended/New articles:

- Article 83 Transitional provisions
- Article 84 Entry into force

VII What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 83	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 84	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* VII Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☒ Yes
☐ No opinion

VII. Please provide your (additional) consideration on the reasoning if necessary.

VII. How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* VII Do you want to provide a different proposal?

- ☐ Yes
☒ No

SOGL amendments

Chapter 1 - Common grid model

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Article 16, Article 17, Article 18, Article 19 and Article 28 of CACM Regulation are proposed to be deleted from CACM Regulation and below articles from the SOGL Regulation amended.

Amended SOGL articles:

- Article 40 Organisation, roles, responsibilities and quality of data exchange
- Article 46 Scheduled data exchange
- Article 52 Data exchange between TSOs and transmission-connected demand facilities
- Article 64 General provisions regarding individual and common grid models
- Article 67 Year-ahead and month-ahead individual and common grid models
 - Option 1 Not to include the best forecast of remedial actions in IGM
 - Option 2 Include the best forecast of remedial actions in IGM
- Article 69 Week-ahead individual and common grid models
- Article 70 Methodology for building two-days ahead, day-ahead and intraday common grid models (options in this article depend on options under X.1 Article 67)

X.1 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 40 SOGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 46 SOGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 52 SOGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 64 SOGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 67 SOGL Option 1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 67 SOGL Option 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 69 SOGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 70 SOGL	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* X.1 Do you consider the reasoning for the amendment sufficient?

- ☐ No
- ☒ Neutral
- ☐ Yes
- ☐ No opinion

X.1 Please provide your (additional) consideration on the reasoning if necessary.

X.1 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* X.1 Do you want to provide a different proposal?

- ☐ Yes
☒ No

Chapter 2 - Remedial actions

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[210413_PC_AM_X_SOGL.2_redispatching_and_countertrading_final.pdf](#)

Article 35 and Article 74 are proposed to be deleted from CACM Regulation and Article 76 from the SOGL Regulation is proposed to be amended.

- Article 76 Proposal for regional operational security coordination
 - Option 1 Keeping the existing text from CACM Regulation and move to SO Regulation
 - Option 2 Improved text in line with ACER Decisions

X.2 What is your opinion on the proposed amendment?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree	No opinion
* Article 76 SOGL Option 1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Article 76 SOGL Option 2	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* X.2 Do you consider the reasoning for the amendment sufficient?

- ☐ No
☐ Neutral
☒ Yes
☐ No opinion

X.2 Please provide your (additional) consideration on the reasoning if necessary.

X.2 How do the proposed amendments contribute to the achievement of the objectives pursuant the article [59\(4\) of the Electricity Regulation](#)?

	Strong negative contribution	Negative contribution	No change	Positive contribution	High positive contribution	No opinion
* Market integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Non-discrimination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Effective competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Efficient functioning of the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* X.2 Do you want to provide a different proposal?

☐ Yes

☒ No

Summary

Please rate the importance of the following topics:

	Not at all important	Slightly important	Important	Fairly important	Very important	No opinion
* TITLE I - General Provisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* TITLE II, Chapter 1 - MCO organisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* TITLE II, Chapter 2 - Tasks and responsibilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* TITLE II, Chapter 3 - Costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* TITLE III, Chapter 1 - General requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* TITLE III, Chapter 2 - Capacity calculation methodologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* TITLE III, Chapter 3 - Capacity calculation process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* TITLE IV, Chapter 1 - Market coupling development, Section 1 - General Requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* TITLE IV, Chapter 1 - Market coupling development, Section 2 - TCMs on algorithm development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* TITLE IV, Chapter 1 - Market coupling development, Section 3 - TCMs on market coupling operation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* TITLE V, Chapter 1 - Bidding zone review process	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* TITLE VI, Chapter 1 - Reporting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* TITLE VI, Chapter 2 - Implementation monitoring	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* TITLE VII - Transitional and final provisions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* SOGL proposals, Chapter 1 - Common grid model	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* SOGL proposals, Chapter 2 - Remedial actions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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Please find below for download the full amendment files in word track change format for your convenience.

The pdf documents in the survey are created from these word-files

[Title I II.zip](#)

[Title III.zip](#)

[Title IV.zip](#)

[Title V VI VII.zip](#)

[Title X SOGL.zip](#)

Useful links

[ACER regulation \(https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0942&from=EN\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0942&from=EN)

[Electricity Regulation \(https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0943&from=EN\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R0943&from=EN)

[CACM Regulation \(https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:02015R1222-20210315&from=EN#tocId22\)](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:02015R1222-20210315&from=EN#tocId22)

[ACER Guidance Note on Consultations \(https://www.acer.europa.eu/Official_documents/Other documents /Guidance Note on Consultations by ACER.pdf\)](https://www.acer.europa.eu/Official_documents/Other_documents/Guidance_Note_on_Consultations_by_ACER.pdf)

Background Documents

[ACER scoping letter to European Commission](#)

[EC Letter on recommendation to ACER](#)

Contact

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