ENTSO-E consultation on the proposed amendments to the methodology for the determination of CCRs

Eurelectric response paper

June 2025

eurelectric
powering people

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:
- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

WG Market Integration & Network Codes

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ENTSO-E consultation on the proposed amendments to the methodology for the determination of CCRs

A Eurelectric position paper June 2025

KEY MESSAGE

- Eurelectric reiterates its support for a highly coordinated capacity calculation process both within the EU and at its external borders.
- However, any expansion of CCRs or mergers must be carefully evaluated in light of the potential interactions between borders and the possible adverse effects on regional capacity calculation processes and their ongoing developments.
- In this context, Eurelectric is in favour of a coordination in capacity calculation to the widest relevant geographical scope considering interdependencies, either through the merger of CCRs or through the implementation of processes such as AHC, whatever is the most relevant.
- Nevertheless, this must be done with the necessary caution to avoid undermining key processes, such as the operational capacity calculation and the EU SDAC and SIDC mechanisms.

Eurelectric welcomes the ENTSO-E consultation on the proposed amendments to the Methodology for the Determination of Capacity Calculation Regions (CCRs).

Eurelectric acknowledges that the initiative aims to accelerate the integration of non-EU Transmission System Operators (TSOs) into the EU regulatory framework in order to strengthen system security, improve the efficiency of capacity calculation, and prevent the fragmentation of closely interconnected bidding zone borders across multiple CCRs.

From a broader perspective, Eurelectric supports the integration of the Energy Community (EnC) into the EU framework, recognizing its potential to enhance coordination and system reliability. However, Eurelectric emphasizes the importance of a gradual and well-managed integration process, underpinned by prior alignment with EU legislation. The recent adoption by the Energy Community's Ministerial Council of a legislative package reflecting the latest EU electricity acquis is an important first step. Ensuring its full and effective implementation is essential for successful integration.

That said, **the consultation documents currently lack quantitative impact assessments that would allow stakeholders to evaluate the actual benefits of this integration in terms of system security**. Furthermore, the long-term plan to merge the transitory ECE CCR with the future Central Europe CCR raises uncertainties, particularly since those CCR are not yet operational. A comprehensive impact assessment of this merger will be necessary once more information on these two CCR becomes available. Additionally, given the uncertainty around the timeline for Energy Community countries to fully transpose the Electricity integration Package into their national legislation, the timeframe for the implementation of this evolution remains difficult to assess.

Regarding the Core and Italy North CCRs, following ongoing merger activities in the CE CCR in the day-ahead timeframe, Eurelectric supports, in principle, the proposal to pursue their merger including for the intraday timeframe as well as for the methodologies for regional operational security coordination, coordinated redispatching and countertrading, and cost-sharing mechanisms. Nevertheless, Eurelectric emphasizes that this approach must be pursued with caution to avoid any adverse effects on the existing CORE capacity calculation process and the EU SIDC mechanisms. Without thorough impact assessments and a clear understanding of how it interacts with current processes, Eurelectric finds it challenging to provide a well-informed opinion.

General position on the proposal:

Eurelectric reiterates its support for a highly coordinated capacity calculation process both within the EU and at its external borders. However, any expansion of CCRs or mergers must be carefully evaluated in light of the potential interactions between borders and the possible adverse effects on regional capacity calculation processes and their ongoing developments. In this context, Eurelectric is in favour of coordination in capacity calculation to the widest relevant geographical scope considering interdependencies either through the merger of CCRs or through the implementation of processes such as AHC, whatever is the most relevant. Nevertheless, this must be done with the necessary caution to avoid undermining key processes, such as the operational capacity calculation and the EU SDAC and SIDC mechanisms.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability

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