ACER consultation on amendments to Europe’s electricity capacity calculation regions

Eurelectric consultation response

September 2025

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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Amendment of the determination of CCR methodology

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

Eurelectric supports, in principle, the proposal to pursue the merger of the Core and Italy North CCRs into the Central Europe CCR, although we continue to regret the lack of an impact assessment regarding the potential negative effects of such an integration.

Eurelectric also endorses the proposed step-by-step approach and the decision to maintain priority on implementing the already approved IDCC, ROSC, RDCT and CS methodologies. It is essential that this prioritization is not undermined by the initiation of work on additional methodologies.

Furthermore, Eurelectric shares the TSOs' view that it is premature to revise the CCR proposal for LTCC. This is particularly relevant given that the target model for long-term markets is still under discussion, and a revision of the FCA Regulation is expected in the coming months. The development of a CE LTCC solution will be highly dependent on this regulatory review.

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

Eurelectric welcomes ACER's consultation on the definition of Capacity Calculation Regions (CCRs), which reflects the proposal submitted by the TSOs and on which Eurelectric provided feedback last June (see our detailed response in the appendix to the explanatory note).

As a result, our position remains broadly consistent: 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, and would have welcomed a detailed quantitative impact assessment to fully assess the actual benefits of such integration in terms of system security and to support a well-informed opinion.

During the 40th meeting of the Market European Stakeholder Committee (MESC), Eurelectric understood that ACER may be considering an alternative approach—namely, merging the ECE and SEE regions to encompass the entire Balkan area. This option was neither presented nor evaluated in the consultation documents. Eurelectric therefore seeks clarification on whether this alternative

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remains under consideration, and the rationale behind it. More broadly, Eurelectric encourages ACER to ensure that its consultations include its own proposals, and not only those originating from TSOs, which are already subject to consultation via ENTSO-E.

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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