
**Consultation responses to the Amended Regional
and Bidding Zone Border Specific Annex for CCR
Hansa to the Harmonised Allocation Rules for long-
term transmission rights in accordance with Article
52 of Commission Regulation (EU) 2016/1719 of 26
September 2016 establishing a Guideline on For-
ward Capacity Allocation**

16th of September 2019

1. Introduction

As a result of ACER decision 04/2019, the bidding zone border DK1-NL, which is created due to the construction of the COBRACable, will be (temporarily) added to CCR Hansa. As a consequence, this also introduces the Dutch TSO (TenneT TSO B.V.) and the Dutch NRA (Autoriteit Consument en Markt, ACM) as official parties within CCR Hansa.

To integrate the DK1-NL bidding zone border in CCR Hansa most existing methodologies of CCR Hansa have to be approved by ACM. Additionally, some methodologies have to be amended to account for additional border specific information stated within the methodologies.

The Regional and Bidding Zone Border Specific Annex for CCR Hansa to the Harmonised Allocation Rules for long-term transmission rights in accordance with Article 52 of Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a Guideline on Forward Capacity Allocation (GL FCA) is one of the methodologies that need amendment. The DK1-NL bidding zone border has to be added.

The amendment to the methodology is in accordance with FCA Article 4(12) of FCA and is consulted on in accordance with Article 6 of FCA¹. The response of this consultation, Hansa NRAs shadow opinion and CCR Hansa TSOs answers, are given in this addendum.

2. Consultation responses and answers

In the consultation period from the 20th of May 2019 to the 20th of June 2019, CCR Hansa received no consultation responses from market parties on the CCR Hansa Regional Annex, However, a shadow opinion from Hansa NRAs was received, and processed in a similar manner as consultation responses. Please find the consultation response and successive CCR Hansa actions below.

¹ <https://consultations.entsoe.eu/markets/har-review-main-body-and-annexes/>

Comment number	Reviewer (organization)	Comment received	Hansa TSO´s reply
1	ACM, BNetzA and DUR	<p><i>"Whereas (8)</i> It is the opinion of NRAs, that all Hansa NRAs, which do not have an exemption in line with FCA Art. 30(7), have to explicitly approve the changes. This would mean ACM, Bnetza and DUR. If something different is meant by the TSOs, then the wording has to be improved.</p>	<p>Hansa TSOs agrees. The wording has been improved to avoid ambiguity. The wording in Whereas (8) is now: "For the purposes of the approval or the future amendment of bidding zone border specific requirements of this proposal, all Hansa NRAs, which have not issued an exemption for LTTRs on CCR Hansa bidding zone borders in accordance with FCA Art. 30(7), have to explicitly approve the changes. Non-concerned NRA(s) of the CCR will be duly informed"</p>
2	ACM, BNetzA and DUR	<p><i>"Article 2 – Duration</i> the HAR was already adopted by ACER on 2nd of October 2017 and has already entered into force, in line with Article 5 of the HAR. The current wording of Article 2 suggests potential retroactivity of the amended Hansa annex, and should be changed. It could for example be in line with what is stated in the CCR Core HAR Annex: <i>"This annex, as amended, shall enter into force at the date and time specified in the amendment notice sent to Registered Participants by the Allocation Platform according to the procedure laid down in Article 68(2) of the HAR and subject to prior approval by the relevant National Regulatory Authorities in accordance with the procedure laid down in Article 4 of the FCA Regulation."</i></p>	<p>Hansa TSOs agrees and wording has been changes according to the text suggestion provided by ACM, BNetzA and DUR.</p>