

# **Intraday capacity calculation methodology of the CE capacity calculation region**

in accordance with Article 20ff. of the Commission Regulation  
(EU) 2015/1222 of 24 July 2015 establishing a guideline on  
capacity allocation and congestion management

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## Whereas

- (1) This document sets out the capacity calculation methodology in accordance with Article 20ff. of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on Capacity Allocation and Congestion Management (hereafter referred to as the “CACM Regulation”). This methodology is hereafter referred to as the “intraday capacity calculation methodology”.
- (2) The intraday capacity calculation methodology takes into account the general principles and goals set in the CACM Regulation as well as in Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (Electricity Regulation). The goal of the CACM Regulation is the coordination and harmonisation of capacity calculation and allocation in the day-ahead and intraday cross-border markets. It sets, for this purpose, the requirements to establish an intraday capacity calculation methodology to ensure efficient, transparent and non-discriminatory capacity allocation.
- (3) According to Article 9(9) of the CACM Regulation, the expected impact of the intraday capacity calculation methodology on the objectives of the CACM Regulation has to be described and is presented below.
- (4) The intraday capacity calculation methodology serves the objective of promoting effective competition in the generation, trading and supply of electricity (Article 3(a) of the CACM Regulation) since it ensures that the cross-zonal capacity is calculated in a way that avoids undue discrimination between market participants and since the same intraday capacity calculation methodology will apply to all market participants on all respective bidding zone borders in the CE CCR, thereby ensuring a level playing field amongst market participants. Market participants will have access to the same reliable information on cross-zonal capacities and allocation constraints for intraday allocation, at the same time and in a transparent way.
- (5) The intraday capacity calculation methodology contributes to the optimal use of transmission infrastructure and to operational security (Article 3(b) and (c) of the CACM Regulation) since the flow-based approach aims at providing the maximum available capacity to market participants on the intraday timeframe within the operational security limits.
- (6) The intraday capacity calculation methodology contributes to avoiding that cross-zonal capacity is limited in order to solve congestion inside control areas by (i) defining clear criteria under which the network elements located inside bidding zones can be considered as limiting for capacity calculation, and (ii) ensuring that a minimum share of the capacity is made available for commercial exchanges while ensuring operational security (Article 3(a) to (c) of the CACM Regulation and Article 16(8) of the Regulation (EU) 2019/943).
- (7) The intraday capacity calculation methodology serves the objective of optimising the allocation of cross-zonal capacity (Article 3(d) of the CACM Regulation), since it is using the flow-based approach, which optimises the way in which the cross-zonal capacities are allocated to market participants, and since it facilitates the efficiency of congestion management by comparing the capacity allocation with other congestion management alternatives, such as the application of remedial actions, bidding zone reconfiguration and network investments.
- (8) The intraday capacity calculation methodology is designed to ensure a fair and non-discriminatory treatment of TSOs, nominated electricity market operators (‘NEMOs’), the Agency, regulatory authorities and market participants (Article 3(e) of the CACM Regulation) since the intraday capacity calculation methodology has been developed and adopted within a process that ensures the involvement of all relevant stakeholders and independence of the approving process.

- (9) The intraday capacity calculation methodology determines the main principles and main processes for the intraday timeframe. It requires that the CE TSOs and iTCP provide market participants with reliable information on cross-zonal capacities and allocation constraints for intraday allocation in a transparent way and at the same time. This includes information on all steps of capacity calculation and regular reporting on specific processes within capacity calculation. The intraday capacity calculation methodology therefore contributes to the objective of transparency and reliability of information (Article 3(f) of the CACM Regulation).
- (10) The intraday capacity calculation methodology provides requirements for efficient use of existing electricity infrastructure and facilitates competitive and equal access to transmission infrastructure in particular in case of congestions. This provides a long-term signal for efficient investments in transmission, generation and consumption, and thereby contributes to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union (Article 3(g) of the CACM Regulation).
- (11) The intraday capacity calculation methodology also contributes to the objective of respecting the need for a fair and orderly market and price formation (Article 3(h) of the CACM Regulation) by making available in due time the information about cross-zonal capacities to be released in the market, by maximising the available cross-zonal capacities and by ensuring a backup solution for the cases where capacity calculation fails to provide flow-based parameters.
- (12) The intraday capacity calculation methodology facilitates a level playing field for NEMOs (Article 3(i) of the CACM Regulation) since all NEMOs and all their market participants will face the same rules and non-discriminatory treatment (including timings, data exchanges, results formats etc.) within the CE CCR.
- (13) Finally, the intraday capacity calculation methodology contributes to the objective of providing non-discriminatory access to cross-zonal capacity (Article 3(j) of the CACM Regulation) by ensuring a transparent and non-discriminatory approach towards facilitating cross-zonal capacity allocation.
- (14) In conclusion, the intraday capacity calculation methodology contributes to the general objectives of the CACM Regulation to the benefit of all market participants and electricity end consumers.
- (15) The intraday capacity calculation methodology is structured into three stages: (i) the definition and provision of capacity calculation inputs by the CE TSOs and iTCP, including the underlying principles and calculation methods for these inputs, (ii), the capacity calculation process by the coordinated capacity calculator in coordination with the CE TSOs and iTCP, and (iii) the capacity validation by the CE TSOs and iTCP in coordination with the coordinated capacity calculator. The roles and responsibilities of the CE TSOs and iTCP and of the coordinated capacity calculator need to be clearly defined.
- (16) The intraday capacity calculation methodology is based on forecast models of the transmission system. The inputs are generated up to one day before the electricity delivery date and are based on the information available at the time of creation.. Therefore, the outcomes are subject to inaccuracies and uncertainties. The aim of the reliability margin is to cover a level of risk induced by these forecast errors.
- (17) The methodology applies temporary solutions for reliability margins, generation shift keys and allocation constraints. As regards reliability margins, the first real calculation can only be done after some operational experience is gained with the application of this methodology. For generation shift keys, TSOs also need some operational experience in order to be able to improve them. The final definition of these capacity calculation inputs should therefore be reviewed and redefined if needed after the effective implementation of this methodology.

- (18) Some operational security limits can be transformed into limitations on active power flows on critical network elements, whereas some other cannot and may be modelled as allocation constraints. Some of the operational security limits (inter alia frequency control, voltage and dynamic stability, and inter-synchronous area ramping restrictions) may depend on the level of production and consumption in a given bidding zone, and as such cannot be controlled by limitations on active power flows on critical network elements. Thus, specific limitations on production and consumption are needed, and these are expressed as maximum import and export constraints of bidding zones respectively from/to interconnectors. Net position constraints are therefore a type of allocation constraints limiting the total import and export of a bidding zone. Their application is considered in this methodology as a temporary solution in order to allow TSOs to explore alternative solutions to the underlying problems. If none of the alternative solutions is more efficient to tackle the underlying problems, the concerned TSOs may propose to continue applying them. In addition to external constraints, ramping constraints which limit the maximum flow change on HVDC interconnectors between synchronous areas from one TU to the next, also constitute a specific type of allocation constraints.
- (19) To avoid undue discrimination between internal and cross-zonal exchanges (and the underlying discrimination between market participants trading inside or between bidding zones), the day-ahead capacity calculation methodology introduces two important measures. The first measure aims to limit the situations where cross-zonal exchanges are limited by congestions inside bidding zones. The second measure aims to minimise the degree to which the flows resulting from exchanges inside a bidding zone on network elements located inside that zone (i.e. internal flows) or on network elements on the borders of bidding zones and inside neighbouring bidding zones (i.e. loop flows) are reducing the available cross-zonal capacity. This methodology also introduces the first measure, which is to limit the cases where congestions inside bidding zones impact cross-zonal capacity only to those situations that are proven to be the most efficient. Other principles from the day-ahead capacity calculation methodology (e.g. introduction of minimum cross-zonal capacities and NRAO optimization) cannot be applied in the intraday capacity calculation methodology, since these principles require measures such as extensive application of remedial actions, yet the time between the intraday capacity calculation and the first delivery hour is too short to identify, coordinate and apply the remedial actions that would be necessary to guarantee the minimum cross-zonal capacity.
- (20) In the zonal congestion management model established by the CACM Regulation, bidding zones should be established such that physical congestions occur only on network elements located on the borders of such bidding zones. The network elements located within bidding zones should therefore *a priori* not limit cross-zonal capacity and should therefore not be considered in capacity calculation. Nevertheless, at the time of adoption of this methodology, some network elements located inside the CE bidding zones are often congested and therefore TSOs need some transition period to shift gradually from limiting cross-zonal capacity, as the main method to address these internal congestions, to other methods in which internal congestions limit cross-zonal capacity only when this is the most efficient solution considering other alternatives (such as remedial actions, reconfiguration of bidding zones or network investments). Only in case those alternatives are proven inefficient, TSOs should be able to continue addressing internal congestions by limiting cross-zonal capacity beyond the transition period.
- (21) Despite coordinated application of capacity calculation, TSOs remain responsible for maintaining operational security. For this reason they need to validate the calculated cross-zonal capacities to ensure that they do not violate operational security limits. Each TSO may individually validate cross-zonal capacities. This may lead to reductions of cross-zonal capacities below the values needed to avoid undue discrimination. Thus transparency, monitoring and reporting, as well as the exploration of alternative solutions are needed in case of reductions of cross-zonal capacities.
- (22) Transparency and monitoring of capacity calculation are essential for ensuring its efficiency and understanding. This methodology establishes significant requirements on TSOs to publish the

information required by stakeholders to analyse the impact of capacity calculation on the market functioning. Furthermore, additional information is required to allow regulatory authorities to perform their monitoring duties. Finally, the methodology establishes significant reporting requirements in order for stakeholders, regulatory authorities and other interested parties to verify whether the transmission infrastructure is operated efficiently and in the interest of consumers.

- (23) To enable a more accurate and efficient representation of connections with neighbouring CCRs, the advanced hybrid coupling (AHC) is foreseen in the Central Europe ID CCM to replace the standard hybrid coupling and provide efficiency gains in the capacity calculation and allocation phase on the borders where AHC is applied. AHC principles can also rather efficiently be applied to a lowly meshed alternating current (AC) border between a Central Europe and a non-Central Europe bidding zone, while its efficiency and accuracy of network representation diminishes with the increased meshness of AC borders. Implementation of AHC is foreseen on all borders linking Central Europe bidding zones and bidding zones of neighbouring CCRs and which are part of SIDC, except for the common borders with GRIT CCR, where only a low efficiency gain is expected in comparison with the challenges imposed by AHC.
- (24) A high interdependency of the capacity calculation with Switzerland with the regions Italy North and Core exists. The merger of Core and Italy North CCRs enables CE TSOs to maximally include and coordinate Swiss borders in the capacity calculation process, thus providing the most efficient capacity calculation for the whole Central Europe CCR among all viable alternatives and hence contributing to the objectives of the CACM Regulation and the Electricity Regulation. Through a contractual framework, Swissgrid shall be included as an integrated technical counterparty.
- (25) CE TSOs and Integrated Technical Counterparty(ies) are developing and implementing processes for intraday capacity calculation. In order to for this methodology to become effective and obligatory for the Integrated Technical Counterparty(ies) a contractual framework is needed. An Integrated Technical Counterparty Agreement, which shall be concluded separately between the Parties, is needed to enable coordination between the Integrated Technical Counterparty(ies) and CE TSOs with regard to the processes, operations and obligations as described in the methodology.

## TITLE 1 – General provisions

### Article 1. Subject matter and scope

1. The intraday capacity calculation methodology shall be considered as a Central Europe TSOs' methodology in accordance with Article 20ff. of the CACM Regulation and shall cover the intraday capacity calculation methodology for the CE CCR and iTCP bidding zone borders.
2. This methodology is without prejudice to the TSOs' rights and obligations under Commission Regulation (EU) 2017/1485 establishing a guideline on electricity transmission system operation, such as taking any remedial actions pursuant to this Regulation to maintain operational security and ensure that the system operates in a normal state. Accordingly, the management of cross-zonal capacities by the TSOs after their delivery to the allocation process is beyond the scope of this methodology.

### Article 2. Definitions and interpretation

For the purposes of the intraday capacity calculation methodology, terms used in this document shall have the meaning of the definitions included in Regulation (EU) 2019/943, Directive (EU) 2019/944, Commission Regulation (EU) 2015/1222, Commission Regulation (EU) 2017/2195, Commission Regulation (EU) 543/2013. In addition, the following definitions, abbreviations and notations shall apply:

- (a) 'AACID' is the already allocated capacity which has been allocated in SIDC;
- (b) 'AHC' means the advanced hybrid coupling, which is a solution to take fully into account the influences of the adjacent CCRs during the capacity allocation;
- (c) 'AHC border' means a border between a bidding zone within and outside of CE CCR where both bidding zones are part of Single-Intraday-Coupling and the AHC is applied;
- (d) 'external virtual hub (EVH)' means a virtual bidding zone without any buy and sell orders, used to represent the imports and exports on an AHC border as specified in Article 14 of this Methodology or exchanges on HVDC interconnectors on the bidding zone borders of the CE CCR when either end of a HVDC interconnector is in a different synchronous area as specified in Article 13 (5);
- (e) ' $AMR_{DA}$ ' means the adjustment for the minimum remaining available margin in accordance with the day-ahead capacity calculation methodology of the CE CCR;
- (f) 'annual report' means the report issued on an annual basis by the CCC and the CE TSOs and iTCP on the intraday capacity calculation;
- (g) 'ATC' means the available transmission capacity, which is the transmission capacity that remains available after the allocation procedure and which respects the physical conditions of the transmission system;
- (h) 'CCC' means the coordinated capacity calculator, as defined in Article 2(11) of the CACM Regulation, of the CE CCR, unless stated otherwise;
- (i) 'CCR' means the capacity calculation region as defined in Article 2(3) of the CACM Regulation;

- (j) ‘CGM’ means the common grid model as defined in Article 2(2) of the CACM Regulation and means the intraday CGM established in accordance with the CGMM;
- (k) ‘CGMM’ means the common grid model methodology, pursuant to Article 17 of the CACM Regulation;
- (l) ‘CNE’ means a critical network element;
- (m) ‘CNEC’ means a CNE associated with a contingency used in capacity calculation. For the purpose of this methodology, the term CNEC also cover the case where a CNE is used in capacity calculation without a specified contingency;
- (n) ‘CE DA CCM’ means the CE day-ahead capacity calculation methodology;
- (o) ‘CE CCR’ means the CE capacity calculation region as established by the Determination of capacity calculation regions pursuant to Article 15 of the CACM Regulation;
- (p) ‘CE net position’ means a net position of a bidding zone or VH in CE CCR resulting from the allocation of cross-zonal capacities within the CE CCR and on AHC borders;
- (q) CE TSOs are 50Hertz Transmission GmbH (“50Hertz”), Amprion GmbH (“Amprion”), Austrian Power Grid AG (“APG”), CREOS Luxembourg S.A. (“CREOS”), ČEPS, a.s. (“ČEPS”), EirGrid PLC (“EirGrid”), Eles d.o.o. sistemski operater prenosnega elektroenergetskega omrežja (“ELES”), Elia System Operator S.A. (“ELIA”), Croatian Transmission System Operator Plc (HOPS d.d.) (“HOPS”), MAVIR Hungarian Independent Transmission Operator Company Ltd. (“MAVIR”), Polskie Sieci Elektroenergetyczne S.A. (“PSE”), RTE Réseau de transport d’électricité (“RTE”), Slovenská elektrizačná prenosová sústava, a.s. (“SEPS”), System Operator for Northern Ireland Ltd. (“SONI”), TenneT TSO GmbH (“TenneT GmbH”), TenneT TSO B.V. (“TenneT B.V.”), TERNA - Rete Elettrica Nazionale S.p.A. (“TERNA”), National Power Grid Company Tranelectrica S.A. (“Tranelectrica”), TransnetBW GmbH (“TransnetBW”);
- (r) ‘cross-zonal CNEC’ means a CNEC of which a CNE is located on the bidding zone border or connected in series to such network element transferring the same power (without considering the network losses);
- (s) ‘curative remedial action’ means a remedial action which is only applied after a given contingency occurs;
- (t) ‘D-1’ means the day before electricity delivery;
- (u) ‘D-2’ means the day two-days before electricity delivery;
- (v) ‘DACF’ means day ahead congestion forecast;
- (w) ‘default flow-based parameters’ means the pre-coupling backup values calculated in situations when the intraday capacity calculation fails to provide the flow-based parameters in three or more consecutive hours. These flow-based parameters are based on previously calculated flow-based parameters;
- (x) ‘ $F_{0,all}$ ’ means the flow per CNEC in a situation without any commercial exchange between bidding zones within Continental Europe, between bidding zones within Continental Europe and bidding zones located in other synchronous areas, and between the island of Ireland and bidding zones located in other synchronous areas;

- (y) ' $F_i$ ' means the expected flow in commercial situation  $i$ ;
- (z) 'flow-based domain' means a set of constraints that limit the cross-zonal capacity calculated with a flow-based approach;
- (aa) 'FRM' or ' $FRM$ ' means the flow reliability margin, which is the reliability margin as defined in Article 2(14) of the CACM Regulation applied to a CNE;
- (bb) ' $F_{max}$ ' means the maximum admissible power flow;
- (cc) ' $F_{ref}$ ' means the reference flow;
- (dd) 'GSK' or ' $GSK$ ' means the generation shift key as defined in Article 2(12) of the CACM Regulation;
- (ee) 'HVDC' means a high voltage direct current network element;
- (ff) 'IDA' means intraday auction;
- (gg) 'ID CC TU' is the intraday capacity calculation time unit, which means the time unit for the intraday capacity calculation and is equal to 15 minutes;
- (hh) 'TU' is the intraday time unit, which means the time unit for the intraday market;
- (ii) 'IGM' means the intraday individual grid model as defined in Article 2(1) of the CACM Regulation;
- (jj) 'internal CNEC' means a CNEC, which is not cross-zonal;
- (kk) ' $I_{max}$ ' means the maximum admissible current;
- (ll) 'IVA' means individual validation adjustment;
- (mm) 'third-country TSO' means a TSO which is not a CE TSO and operates in a country which is not a Member State of the European Union;
- (nn) 'integrated technical counterparty' (iTCP) means a TSO which is not a CE TSO and operates in a country which is not a Member State of the European Union, but is included in the CE intraday capacity calculation pursuant to Article 14(2) and (3);
- (oo) 'integrated technical counterparty bidding-zone' (iTCP bidding-zone) means the bidding-zone of a country which is not a Member State of the European Union and in which the iTCP operates;
- (pp) 'integrated technical counterparty agreement' means the agreement between all CE TSOs and the iTCP to jointly apply the CE intraday capacity calculation methodology at the borders between the relevant CE TSOs and the iTCP and contractually settled between all CE TSOs and the iTCP as described in Article 14 of this methodology;
- (qq) 'NP' or ' $NP$ ' means a net position of a bidding zone, which is the net value of generation and consumption in a bidding zone;
- (rr) 'NPAAC,DA' means net position resulting from already allocated capacities in SDAC;
- (ss) 'NPAAC,ID' means net position resulting from already allocated capacities in SIDC;

- (tt) ‘oriented bidding zone border’ means a given direction of a bidding zone border (e.g. from Germany to France);
- (uu) ‘pre-solved domain’ means the final set of binding constraints for capacity allocation after the pre-solving process;
- (vv) ‘pre-solving process’ means the identification and removal of redundant constraints from the flow-based domain;
- (ww) ‘preventive remedial action’ means a remedial action which is applied on the network before any contingency occurs;
- (xx) ‘PST’ means a phase-shifting transformer;
- (yy) ‘PTDF’ or ‘*PTDF*’ means a power transfer distribution factor;
- (zz) ‘**PTDF<sub>CE</sub>**’ means a matrix of power transfer distribution factors resulting from the intraday flow-based calculation for CE bidding zones;
- (aaa) ‘**PTDF<sub>all</sub>**’ means a matrix of power transfer distribution factors resulting from the intraday flow-based calculation for all bidding zones of Continental Europe, and connection points of the bidding zones of Continental Europe with the bidding zones of other synchronous areas;
- (bbb) ‘**PTDF<sub>f,DA</sub>**’ means a matrix of power transfer distribution factors describing the final day-ahead flow-based domain;”
- (ccc) ‘quarterly report’ means a report on the intraday capacity calculation issued by the CCC and the CE TSOs and iTCP on a quarterly basis;
- (ddd) ‘RA’ means a remedial action as defined in Article 2(13) of the CACM Regulation;
- (eee) ‘RAM’ or ‘*RAM*’ means a remaining available margin;
- (fff) ‘RCC’ means Regional Coordination Centre;
- (ggg) ‘reference net position or exchange’ means a position of a bidding zone or an exchange over HVDC interconnector assumed within the CGM;
- (hhh) ‘SDAC’ means the single day-ahead coupling;
- (iii) ‘SIDC’ means the single intraday coupling;
- (jjj) ‘shadow price’ means the dual price of a CNEC or allocation constraint representing the increase in the economic surplus if a constraint is increased by one MW;
- (kkk) ‘slack node’ means the reference node used for determination of the PTDF matrix, i.e. shifting the power infeed of generators up results in absorption of the power shift in the slack node. Each synchronous area has one designated single slack node, which remains constant for each ID CC TU;
- (III) ‘SO Regulation’ means Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation;

- (mmm) ‘standard hybrid coupling’ means a solution to capture the influence of exchanges with non-CE bidding zones on CNECs that is not explicitly taken into account during the capacity allocation phase;
- (nnn) ‘static grid model’ means a list of relevant grid elements of the transmission system, including their electrical parameters;
- (ooo) ‘U’ is the reference voltage;
- (ppp) ‘UAF’ is an unscheduled allocated flow;
- (qqq) ‘vertical load’ means the total amount of electricity which exits the transmission system of a given bidding zone to connected distribution systems, end consumers connected to the transmission system, and to electricity producers for consumption in the generation of electricity;
- (rrr) ‘zone-to-slack *PTDF*’ means the *PTDF* of a commercial exchange between a bidding zone and the slack node or between a VH and the slack node;
- (sss) ‘zone-to-zone *PTDF*’ means the *PTDF* of a commercial exchange between two bidding zones, between two VHs or between a VH and a bidding zone;
- (ttt) the notation  $x$  denotes a scalar;
- (uuu) the notation  $\vec{x}$  denotes a vector;
- (vvv) the notation  $\mathbf{x}$  denotes a matrix;
- (www) ‘ $SEC_{DA}$ ’ means scheduled exchange resulting from already allocated capacities in the single day ahead coupling (SDAC). The parameter is provided by the SDAC based on the all TSO methodology for calculating scheduled exchanges resulting from single day-ahead coupling according to Article 43 of CACM Regulation;
- (xxx) ‘XNEC’ means cross-border relevant network element with contingency, as defined in the Core ROSC methodology.
- (yyy) ‘internal virtual hub (IVH)’ means a virtual bidding zone without any buy and sell orders, used to represent the commercial exchanges on an internal CE HVDC interconnector, where the evolved flow based approach is applied as specified in Article 13 of this Methodology;
- (zzz) ‘SEM’ means the Single Electricity Market, the bidding zone consisting of both Ireland and Northern Ireland as a single all-island electricity market;
- (aaaa) ‘virtual hub’ (VH) means external or internal virtual hub.
- (bbbb) ‘Ramping Constraints’ means the constraints to be respected during capacity allocation to limit the variation of the net position or import/export from/to a set of interconnectors from one MTU to the next

1. In this intraday capacity calculation methodology unless the context requires otherwise:

- (a) the singular also includes the plural and vice versa;
- (b) the acronyms used both in regular and italic font represent respectively the term used and the respective variable;

- (c) the table of contents and the headings are inserted for convenience only and do not affect the interpretation of this intraday capacity calculation methodology;
- (d) any reference to the intraday capacity calculation, intraday capacity calculation process or the intraday capacity calculation methodology shall mean a common intraday capacity calculation, common intraday capacity calculation process and common intraday capacity calculation methodology respectively, which is applied by all CE TSOs and iTCP in a common and coordinated way on all bidding zone borders of the CE CCR; and
- (e) any reference to legislation, regulation, directive, decision, order, instrument, code, or any other enactment shall include any modification, extension or re-enactment of it when in force.

### **Article 3. Application of this methodology**

This intraday capacity calculation methodology solely applies to the intraday capacity calculation within the CE CCR. The relevant provisions of this methodology apply to the iTCP, by virtue of the integrated technical counterparty agreement. Capacity calculation methodologies within other CCRs or for other time frames are not in the scope of this methodology.

## **TITLE 2— General description of the capacity calculation methodology**

### **Article 4. Intraday capacity calculation process**

1. For the intraday market time frame, the cross-zonal capacities shall be calculated using the flow-based approach as defined in this methodology.
2. The intraday cross-zonal capacity calculation shall be performed in the following sequence, by the times established in the process description document as referred to in paragraph 7:
  - (a) IDCC(a): updating of cross-zonal capacities remaining after the SDAC for all ID CC TUs between 00:00 and 24:00 of day D and providing them as intraday cross-zonal capacities to relevant NEMOs with a target end of time of 15 minutes before the intraday cross-zonal gate opening time, at 15:00 market time of day D-1. In case intraday cross-zonal capacities cannot be provided before the intraday cross-zonal gate opening time, the intraday cross-zonal capacities can be provided to the continuous trading platform until 17:20;
  - (b) IDCC(b): calculation of intraday cross-zonal capacities for all ID CC TUs between 00:00 and 24:00 of day D. The cross-zonal capacities resulting from this calculation shall be published and submitted to NEMOs with a target end of time of 15 minutes before the target start of allocation at 22:00 market time of day D-1. In case intraday cross-zonal capacities cannot be provided before the target start of allocation at 22:00 market time of day D-1, the intraday cross-zonal capacities can be provided until 22:30 D-1 to the continuous trading platform;
  - (c) IDCC(c): re-calculation of intraday cross-zonal capacities for all ID CC TUs between 06:00 and 24:00 of day D. The cross-zonal capacities resulting from this calculation shall be published and submitted to NEMOs no later than 04:30 on day D for immediate use on the continuous trading platform;
  - (d) IDCC(d): re-calculation of intraday cross-zonal capacities for all ID CC TUs between 12:00 and 24:00 of day D. The cross-zonal capacities resulting from this re-calculation shall be published and submitted to NEMOs with a target end of time of 15 minutes before the target start of allocation at 10:00 market time of day D. In case intraday cross-zonal

capacities cannot be provided before the target start of allocation at 10:00 market time of day D, the intraday cross-zonal capacities can be provided until 10:30 D to the continuous trading platform; and

- (e) IDCC(e): re-calculation of intraday cross-zonal capacities for all ID CC TUs between 18:00 and 24:00 of day D. The cross-zonal capacities resulting from this calculation shall be published and submitted to NEMOs no later than 16:00 on day D for immediate use on the continuous trading platform.
3. Each calculation or re-calculation of cross-zonal capacities pursuant to paragraphs 2(a) to (2)(e), shall consist of three main stages:
  - (a) the creation of capacity calculation inputs by the CE TSOs and iTCP;
  - (b) the capacity calculation process by the CCC; and
  - (c) the capacity validation by the CE TSOs and iTCP in coordination with the CCC.
4. For each calculation pursuant to paragraphs 2(b) to (2)(e), each CE TSO and iTCP shall provide the CCC the following capacity calculation inputs by the times established in the process description document, with the reservation that CE TSOs in the SEM bidding zone may delegate their obligation of providing the following inputs to each other, subject to prior agreement and in accordance with applicable procedures:
  - (a) individual list of CNECs in accordance with Article 5;
  - (b) operational security limits in accordance with Article 6;
  - (c) allocation constraints in accordance with Article 7;
  - (d) FRMs in accordance with Article 8;
  - (e) GSKs in accordance with Article 9; and
  - (f) non-costly and costly RAs in accordance with Article 10.
5. In addition to the capacity calculation inputs pursuant to paragraph 4, the CE TSOs and iTCP, or an entity delegated by the CE TSOs and iTCP, shall send to the CCC, for each ID CC TU of the delivery day, the following additional inputs by the times established in the process description document:
  - (a) the CE net positions or, alternatively, the already allocated capacities on the SDAC bidding zone borders resulting from the SDAC;
  - (b) the CE net positions or, alternatively, the already allocated capacities on the SIDC bidding zone borders resulting from the SIDC which are already included in the CGM;
  - (c) the CE net positions or, alternatively, the already allocated capacities on the SIDC bidding zone borders resulting from the SIDC not already included in the CGM.
  - (d) the nominations resulting from explicit market-based allocation processes on the borders of the iTCP, for both Day-Ahead and Intraday timeframes.
6. If the CE TSOs and the iTCP provided to the CCC the already allocated capacities on the CE bidding zone borders, or the nominations resulting from explicit allocation processes, instead of the CE net positions, the CCC shall convert them into CE net positions.

7. When providing the capacity calculation inputs pursuant to paragraphs 4 and 5, the CE TSOs and iTCP shall respect the formats commonly agreed between the CE TSOs and iTCP and the CCC while fulfilling the requirements and guidance defined in the CGMM.
8. No later than six months before the implementation of this methodology in accordance with Article 24(3)(b), the CE TSOs and iTCP shall jointly establish a process description document as referred to in paragraphs 2, 4 and 5 and publish it on the online communication platform as referred to in Article 23. This document shall reflect an up-to-date detailed process description of all capacity calculation steps including the timeline of each step of the intraday capacity calculation.
9. The CE RCCs, acting as the CCC shall use the latest available CGMs, proposed and coordinated XRAs from the day ahead and intraday CROSAs, in accordance with the CSAM. During the interim period until ROSC CROSA process is implemented in accordance with Article 37 of Core ROSC methodology, only the latest available CGM shall be delivered.
10. In case the necessary outputs of the ROSC ICS/CROSA process cannot be provided within the foreseen timeframe, the delivery of the CGMs and XRAs pursuant to paragraph 8, and subsequent intraday capacity calculation and delivery of intraday capacities may be delayed only up to a point in time at which the target start of allocation pursuant to paragraphs 2(b), 2(c), 2(d) and 2(e) is not yet affected. If the target start of allocation becomes affected by such a delay, the fallback procedure pursuant to Article 19 applies.
11. The intraday capacity calculation process pursuant to paragraphs 2(b), 2(c), 2(d) and 2(e) and validation in the CE CCR shall be performed by the CCC and the CE TSOs and iTCP according to the following procedure:
  - Step 1. The CCC shall define the initial list of CNECs pursuant to Article 15;
  - Step 2. The CCC shall calculate the first flow-based parameters ( $PTDF_{init}$  and  $F_{ref,init}$ ) for each initial CNEC pursuant to Article 15;
  - Step 3. The CCC shall determine the final list of CNECs for subsequent steps of the capacity calculation pursuant to Article 16;
  - Step 4. The CCC shall calculate the  $RAM$  before validation ( $RAM_{bv}$ ) based on the results of the previous processes pursuant to Article 17;
  - Step 5. The CE TSOs and iTCP shall, according to Article 18, validate the  $RAM_{bv}$  with individual validation, and decrease  $RAM$  when operational security is jeopardised, which results in the final  $RAM_f$ ;
  - Step 6. The CCC shall, according to Article 18, remove the redundant CNECs and redundant allocation constraints from final  $PTDF_f$  and  $RAM_f$ ;
  - Step 7. The CCC shall publish the  $PTDF_f$  and  $RAM_f$  values in accordance with Article 23 and provide them to NEMOs for capacity allocation in accordance with paragraph 2.
12. All capacity updates, calculations and re-calculations pursuant to paragraph 2, including all steps pursuant to paragraph 3, shall be performed per ID CC TU. Cross-zonal capacities shall be provided to the NEMOs for each ID CC TU, but for capacity allocation they may be converted into a higher time resolution in accordance with the market time unit applicable on specific bidding zone border(s).

## TITLE 3 – Capacity calculation inputs

### Article 5. Definition of critical network elements and contingencies

1. Each CE TSO and iTCP shall define a list of CNEs, which are fully or partly located in its own control area, and which can be overhead lines, underground cables, or transformers. All cross-zonal network elements shall be defined as CNEs, whereas only those internal network elements, which are defined pursuant to paragraph 6 or 7 shall be defined as CNEs. Until 30 days after the approval of the proposal pursuant to paragraph 6, all internal network elements may be defined as CNEs.
2. CNEs pursuant to paragraph 1 shall additionally include those elements on AHC borders. In case the capacity constraints resulting from cross-zonal network elements on an AHC border are already considered in another CCR, a CE TSO or iTCP may decide not to define such network elements as CNE or CNEC in CE. Such a CNE or CNEC on an AHC border shall be regularly monitored only in a single CCR. Any CE TSO or iTCP willing to deviate from this rule shall justify such deviation to other CE TSOs and iTCP
3. Each CE TSO and iTCP shall define a list of proposed contingencies used in operational security analysis in accordance with Article 33 of the SO Regulation, limited to their relevance for the set of CNEs as defined in paragraph 1 and pursuant to Article 23(2) of the CACM Regulation. The contingencies of a CE TSO or iTCP shall be located within the observability area of that CE TSO or iTCP. This list shall be updated at least on a yearly basis and in case of topology changes in the grid of the CE TSO or iTCP, pursuant to Article 22. A contingency can be an unplanned outage of:
  - (a) a line, a cable, or a transformer;
  - (b) a busbar;
  - (c) a generating unit;
  - (d) a load; or
  - (e) a set of the aforementioned elements.
4. Each CE TSO and iTCP shall establish a list of CNECs by associating the contingencies established pursuant to paragraph 2 with the CNEs established pursuant to paragraph 1 following the rules established in accordance with Article 75 of the SO Regulation. Until such rules are established and enter into force, the association of contingencies to CNEs shall be based on each TSO's operational experience. An individual CNEC may also be established without a contingency.
5. Each CE TSO and iTCP shall provide to the CCC a list of CNECs established pursuant to paragraph 3.
6. No later than twelve months after the list of internal network elements is established in CE DA, all CE TSOs and iTCP shall jointly develop a list of internal network elements (combined with the relevant contingencies) to be defined as CNECs and submit it by the same deadline to all CE regulatory authorities as a proposal for amendment of this methodology in accordance with Article 9(13) of the CACM Regulation. After its approval in accordance with Article 9 of the CACM Regulation, the list of internal CNECs shall form an annex to this methodology.
7. The list pursuant to the previous paragraph shall be updated at least every two years. For this purpose, no later than eighteen months after the approval by all CE regulatory authorities of the

proposal for amendment of this methodology pursuant to previous paragraph and this paragraph, all CE TSOs and iTCP shall jointly develop a new proposal for the list of internal CNECs and submit it by the same deadline to all CE regulatory authorities as a proposal for amendment of this methodology in accordance with Article 9(13) of the CACM Regulation. After its approval in accordance with Article 9 of the CACM Regulation, the list of internal CNECs shall replace the relevant annex to this methodology.

8. The proposed list of internal CNECs pursuant to paragraph 5 and 6 shall not include any internal network element with contingency with a maximum zone-to-zone PTDf below 5%, calculated as the time-average over the last twelve months. An exception is applied for CNECs that are considered in accordance with Article 16(2) to (3) and Article 18(4).
9. The proposal pursuant to paragraphs 5 and 6 shall include at least the following:
  - (a) a list of proposed internal CNECs with the associated maximum zone-to-zone PTDf's referred to in paragraph 7;
  - (b) an impact assessment of increasing the threshold of the maximum zone-to-zone PTDf for exclusion of internal CNECs referred to in paragraph 7 to 10% or higher; and
  - (c) for each proposed internal CNEC, an analysis demonstrating that including the concerned internal network element in capacity calculation is economically the most efficient solution to address the congestions on the concerned internal network element, considering, for example, the following alternatives:
    - i. application of remedial actions;
    - ii. reconfiguration of bidding zones;
    - iii. investments in network infrastructure combined with one or the two above; or
    - iv. a combination of the above.

Before performing the analysis pursuant to point (c), the CE TSOs and iTCP shall jointly coordinate and consult with all CE regulatory authorities on the methodology, assumptions and criteria for this analysis.

10. The proposals pursuant to paragraphs 5 and 6 shall also demonstrate that the concerned CE TSOs and iTCP have diligently explored the alternatives referred to in paragraph 8 sufficiently in advance taking into account their required implementation time, such that they could be applied or implemented by the time that the decisions of the CE regulatory authorities on the proposal pursuant to paragraphs 5 and 6 are taken.
11. The CE TSOs and iTCP shall regularly review and update the application of the methodology for determining CNECs as defined in Article 22.

## **Article 6. Methodology for operational security limits**

1. The CE TSOs and iTCP shall use in the intraday capacity calculation the same operational security limits as those used in the operational security analysis carried out in accordance with Article 72 of the SO Regulation.

2. To take into account the operational security of CNEs, the CE TSOs and iTCP shall use the maximum admissible current limit ( $I_{max}$ ), which is the physical limit of a CNE according to the operational security limits in accordance with Article 25 of the SO Regulation. The maximum admissible current shall be defined as follows:

- (a) the maximum admissible current can be defined as:
- i. Seasonal limit, which means a fixed limit for all ID CC TUs of each of the four seasons.
  - ii. Dynamic limit, which means a value per ID CC TU reflecting the varying ambient conditions.
  - iii. Fixed limits for all ID CC TUs, in case of specific situations where the physical limit reflects the capability of overhead lines, transformers, cables or substation equipment installed in the primary power circuit (such as circuit-breaker, or disconnector) with limits not sensitive to ambient conditions, or where operational security limits are not set by thermal rating.
- (b) when applicable,  $I_{max}$  shall be defined as a temporary current limit of the CNE in accordance with Article 25 of the SO Regulation. A temporary current limit means that an overload is only allowed for a certain finite duration. As a result, various CNECs associated with the same CNE may have different  $I_{max}$  values.
- (c)  $I_{max}$  shall represent only real physical properties of the CNE and shall not be reduced by any security margin.<sup>1</sup>
- (d) the CCC shall use the  $I_{max}$  of each CNEC to calculate  $F_{max}$  for each CNEC, which describes the maximum admissible active power flow on a CNEC.  $F_{max}$  shall be calculated by the given formula:

$$F_{max} = \sqrt{3} \cdot I_{max} \cdot U \cdot \cos(\varphi)$$

Equation 1

- (e) where  $I_{max}$  is the maximum admissible current of a critical network element (CNE),  $U$  is a fixed reference voltage for each CNE, and  $\cos(\varphi)$  is the power factor.
- (f) the CCC shall, by default, set the power factor  $\cos(\varphi)$  to 1 based on the assumption that the CNE is loaded only by active power and that the share reactive power is negligible (i.e.  $\varphi = 0$ ). If the share of reactive power is not negligible, a TSO may consider this aspect during the validation phase in accordance with Article 18.
3. The CE TSOs and iTCP shall aim at gradually phasing out the use of seasonal limits pursuant to paragraph 2(a)(i) and replace them with dynamic limits pursuant to paragraph 2(a)(ii) when the benefits are greater than the costs. Each CE TSOs and iTCP shall provide annually the status of operational limits in place. No later than 24 months after the implementation of this methodology in accordance with Article 24(2,e), CE TSOs and iTCP shall conduct an analysis on the efficiency of implementing dynamic limits for the maximum admissible current. This analysis shall include an identification of the CNECs where dynamic limits would bring the most value and possible solution to implement more granular operational security limits. Every two years after the end of

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<sup>1</sup> Uncertainties in capacity calculation are covered on each CNEC by the flow reliability margin (*FRM*) in accordance with Article 8. and adjustment values related to validation in accordance with Article 18.

the calendar year, all CE TSOs and iTCP shall analyse all CNEs which jointly collected 99% of cumulative shadow price in the period of last two calendar years.

4. TSOs shall regularly review and update operational security limits in accordance with Article 22.

### **Article 7. Methodology for allocation constraints**

1. In case operational security limits cannot be transformed efficiently into  $I_{max}$  and  $F_{max}$  pursuant to Article 6, the CE TSOs and iTCP may transform them into allocation constraints.
2. The CE TSOs and iTCP may apply allocation constraints as one of the following five options:
  - (a) a constraint on the CE net position (the sum of cross-zonal exchanges within the CE CCR and on AHC borders for a certain bidding zone in the SIDC), thus limiting the net position of the respective bidding zone with regards to its imports and/or exports to other bidding zones in the CE CCR. This option shall be applied until option (b) can be applied.
  - (b) a constraint on the global net position (the sum of all cross-zonal exchanges for a certain bidding zone in the SIDC), thus limiting the net position of the respective bidding zone with regards to all CCRs, which are part of the SIDC. This option shall be applied when:
    - (i) such a constraint is approved within all intraday capacity calculation methodologies of the respective CCRs, (ii) the respective solution is implemented within the SIDC algorithm and (iii) the respective bidding zone borders are participating in SIDC.
  - (c) A constraint limiting the sum of import/export from/to a set of interconnectors. This option shall be applied when: (i) the respective solution is implemented within the SIDC algorithm and (ii) the respective bidding zone borders are participating in SIDC.
  - (d) A ramping constraint (flow ramping limit) limiting the maximum variation of the CE net position of a bidding zone in the SIDC (or import/export from/to a set of interconnectors) from one MTU to the next.
  - (e) Ramping constraints (flow ramping limits) that limit the maximum flow change on HVDC interconnectors between synchronous areas from one MTU to the next.
3. For iTCP bidding zone borders with the CE CCR, that are not included in SIDC, allocation constraints used by Terna are directly applied in the calculation performed by the CCC pursuant to Article 22.
4. Allocation constraints referred to in Article 7(2)(a) to(2)(c) may be used by PSE, Terna, and EirGrid/SONI, and allocation constraints pursuant to Article 7(2)(d) only by Terna, as listed in Annex 1 during a transition period of two years following the implementation of this methodology in accordance with Article 27(2)(b) and in accordance with the reasons and the methodology for the calculation of allocation constraints as specified in Annex 1 to this methodology. During this transition period, the concerned CE TSOs and iTCP shall:
  - (a) calculate the value of allocation constraints in accordance with Annex 1;
  - (b) in case the allocation constraints had a non-zero shadow price in more than 0.1% of hours in a quarter, provide to the CCC a report analysing:
    - i. for each DA CC MTU when the allocation constraint had a non-zero shadow price the loss in economic surplus due to allocation constraint and the effectiveness of the allocation constraint in preventing the violation of the underlying operational security limits and

- ii. alternative solutions to address the underlying operational security limits. The CCC shall include this report as an annex in the quarterly report as defined in Article 25(5);
  - (c) if applicable and when more efficient, implement alternative solutions referred to in point (b).
  - (d) allocation constraints pursuant to Article 7(2)(e) may be used by EirGrid/SONI without a transitional period and reporting required in Article 7(4).
5. In case the concerned CE TSOs or iTCP could not find and implement alternative solutions referred to in the previous paragraph, it may, by eighteen months after the implementation of this methodology in accordance with Article 26(2)(b), together with all other CE TSOs and iTCP, submit to all CE regulatory authorities a proposal for amendment of this methodology in accordance with Article 9(13) of CACM Regulation. Such a proposal shall include the following:
  - (a) the technical and legal justification for the need to continue using the allocation constraints indicating the underlying operational security limits and why they cannot be transformed efficiently into  $I_{max}$  and  $F_{max}$ ;
  - (b) the methodology to calculate the value of allocation constraints including the frequency of recalculation.
6. In case such a proposal has been submitted by all CE TSOs and iTCP, the transition period referred to in paragraph 3 shall be extended until the decision on the proposal is taken by all CE regulatory authorities.
7. For the SIDC ATC extraction procedure, pursuant to Article 20, allocation constraints referred to in Article 7(2)(a) and 7(2)(b), shall be modelled as constraints limiting the CE net position as referred to in Article 7(2)(a).
8. A concerned CE TSO or iTCP may discontinue the use of an allocation constraint. In such a case, a concerned CE TSO or iTCP shall communicate this change to all CE regulatory authorities and to the market participants at least one month before discontinuation.
9. The CE TSOs and iTCP shall review and update allocation constraints in accordance with Article 22.

## **Article 8. Reliability margin methodology**

1. The *FRMs* shall cover the following forecast uncertainties:
  - (a) cross-zonal exchanges on bidding zone borders outside the CE CCR excluding AHC borders;
  - (b) generation pattern including specific wind and solar generation forecast;
  - (c) generation shift key;
  - (d) load forecast;
  - (e) topology forecast;
  - (f) unintentional flow deviation due to frequency containment process; and

- (g) flow-based capacity calculation assumptions including linearity and modelling of external (non-CE) TSOs' areas.
2. The CE TSOs and iTCP shall aim at reducing uncertainties by studying and tackling the drivers of uncertainty.
  3. The *FRMs* shall be calculated in two main steps. In the first step, the probability distribution of deviations between the expected power flows at the time of the capacity calculation and the realised power flows in real time shall be calculated. To calculate the expected power flows ( $F_{exp}$ ), for each ID CC TU of the observation period, the historical CGMs and GSKs used in capacity calculation shall be used. The historical CGMs shall be updated with the deliberated CE TSOs and iTCP's actions (including at least the RAs considered during the capacity calculation) that have been applied in the relevant ID CC TU<sup>2</sup>. The power flows of such modified CGMs shall be recalculated ( $F_{ref}$ ) and then adjusted to take into account the realised commercial exchanges inside the CE CCR and on AHC borders. The latter adjustment shall be performed by calculating *PTDFs* according to the methodology as described in Article 12, but using the modified CGMs and the historical GSKs. The expected power flows at the time of the capacity calculation shall therefore be calculated using the final realised commercial exchanges in the CE CCR and on AHC borders which are reflected in realised power flows. This above calculation of expected power flows ( $F_{exp}$ ) is described with Equation 2.

$$\vec{F}_{exp} = \vec{F}_{ref} + \mathbf{PTDF} (\overline{NP}_{real} - \overline{NP}_{ref})$$

Equation 2

with

$\vec{F}_{exp}$	expected power flow per CNEC in the realised commercial situation in CE CCR
$\vec{F}_{ref}$	flow per CNEC in the CGM updated to take deliberate TSO actions into account
<b>PTDF</b>	power transfer distribution factor matrix calculated with updated CGM
$\overline{NP}_{real}$	CE net position in the realised commercial situation
$\overline{NP}_{ref}$	CE net position in the updated CGM

4. The expected power flows on each CNEC of the CE CCR shall then be compared with the realised power flows observed on the same CNEC. When calculating the expected (respectively realised) flows for CNECs, the expected (resp. realised) flows shall be the best estimate of the expected (resp. realised) power flow which would have occurred, should the outage have taken place. Such estimate shall take curative remedial actions into account where relevant. All differences between these two flows for all ID CC TUs of the observation period shall be used to define the probability distribution of deviations between the expected power flows at the time of the capacity calculation and the realised power flows;
5. In the second step, the 90th percentiles of the probability distributions of all CNECs shall be calculated. This means that the CE TSOs and iTCP apply a common risk level of 10% and thereby

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<sup>2</sup> These actions are controlled by the CE TSOs and iTCP and thus not considered as an uncertainty.

the *FRM* values cover 90% of the historical forecast errors within the observation period. Subject to the proposal pursuant to paragraph 6, the *FRM* value for each CNEC shall either be:

- (a) the 90th percentile of the probability distributions calculated for such CNEC;
  - (b) the 90th percentile of the probability distributions calculated for the CNEs underlying such CNEC.
6. Each TSO may reduce the *FRM* values resulting from the second step for its own CNECs if it considers that the underlying uncertainties have been over-estimated. For CNECs used within both the CE day-ahead and intraday capacity calculations, the *FRM* values calculated pursuant to this methodology shall not be higher than the *FRM* values for the same CNECs used within the CE day-ahead capacity calculation.
7. No later than twelve months after the *FRM* calculation is done in CE DA, the CE TSOs and iTCP shall jointly perform the first *FRM* calculation pursuant to the methodology described above and based on the data covering at least the first year of operation of this methodology. By the same deadline, all CE TSOs and iTCP shall submit to all CE regulatory authorities a proposal for amendment of this methodology in accordance with Article 9(13) of the CACM Regulation as well as the supporting document as referred to in paragraph 9 below.
8. The proposal for amendment of this methodology pursuant to the previous paragraph shall specify whether the *FRM* value shall be calculated for each CNEC based on the underlying probability distribution, or whether all CNECs with the same underlying CNE shall have the same *FRM* value calculated based on the probability distribution calculated for the underlying CNE. In case the proposal suggests calculating the *FRMs* at CNEC level, the proposal shall describe in detail how to estimate the expected and realised flows adequately, including the RAs that would have been triggered in order to manage the contingency when relevant.
9. The supporting document for the proposal for amendment of this methodology pursuant to paragraph 7 above shall include at least the following:
  - (a) the *FRM* values for all CNECs calculated at the level of CNE and CNEC; and
  - (b) an assessment of the benefits and drawbacks of calculating the *FRM* at the level of CNE or CNEC.
10. Until the proposal for amendment of this methodology pursuant to paragraph 7 is approved, the CE TSOs and iTCP shall use the following *FRM* values:
  - (a) if and as long as all CE TSOs and iTCP apply *FRM* for the day-ahead capacity calculation equal to 10% of  $F_{max}$ , the *FRM* value for intraday capacity calculation for each CNEC shall be  $\min\{5\% \text{ of } F_{max}, \text{FRM at day-ahead level}\}$ ;
  - (b) as soon as the CE TSOs and iTCP start applying the *FRM* calculation for the day-ahead capacity calculation pursuant to Article 8 of CE DA CCM, the *FRM* value for intraday capacity calculation shall be equal or lower than the *FRM* value at the day ahead level.
11. After the proposal for amendment of this methodology pursuant to paragraph 7 is approved, the *FRM* values shall be updated at least once every year based on an observation period of one year in order to reflect the seasonality effects. The *FRM* values shall then remain fixed until the next update.

## Article 9. Generation shift key methodology

1. Each CE TSO and iTCP shall define for its bidding zone and for each ID CC TU a GSK, which translates a change in a bidding zone net position into a specific change of injection or withdrawal in the CGM. A GSK shall have fixed values, which means that the relative contribution of generation or load to the change in the bidding zone net position shall remain the same, regardless of the volume of the change.
2. For a given ID CC TU, the GSK shall only include actual generation and/or load<sup>3</sup> present in the CGM for that ID CC TU. The CE TSOs and iTCP shall take into account the available information on generation or load available in the CGM in order to select the nodes that will contribute to the GSK.
3. The GSKs shall describe the expected response of generation and/or load units to changes in the net positions. This expectation shall be based on the observed historical response of generation and/or load units to changes in net positions, clearing prices and other fundamental factors, and thereby contributing to minimising the FRM.
4. The GSKs shall be updated and reviewed on a daily basis or whenever the expectations referred to in paragraph 3 change. The CE TSOs and iTCP shall review and update the application of the generation shift key methodology in accordance with Article 22.
5. The CE TSOs and iTCP belonging to the same bidding zone shall jointly define a common GSK for that bidding zone and shall agree on a methodology for such coordination. For Germany and Luxembourg, each TSO shall calculate its individual GSK and the CCC shall combine them into a single GSK for the whole German-Luxembourgian bidding zone, by assigning relative weights to each TSO's GSK. The German and Luxembourgian TSOs shall agree on these weights, based on the share of the generation in each TSO's control area that is responsive to changes in net position, and provide them to the CCC.
6. The CCC shall define GSKs for the AHC EVHs according to Article 14 (3) b as follows:
  - (a) In case an EVH represents only HVDC interconnectors, the GSK shall be defined by all converter stations of the HVDC interconnectors, weighted based on the respective transmission capacity.
  - (b) In case an EVH represents only AC interconnectors, the CCC shall use the GSK of the adjacent bidding zone provided by the TSOs of that bidding zone. If this GSK is not available, the CCC shall define a GSK based on all positive injections in the IGM of the adjacent bidding zone.
7. In case an EVH represents both HVDC interconnectors and AC interconnectors, the respective CE TSO or iTCP shall define a single combined GSK based on the GSK for the HVDC and the GSK for the AC interconnectors.
8. Within 38 months after the implementation of this methodology in accordance with Article 24(2)(b) and as soon as the updated GSK is implemented in DA all CE TSOs and iTCP shall develop a proposal for further harmonisation of the generation shift key methodology and submit it by the same deadline to all CE regulatory authorities as a proposal for amendment of this methodology in accordance with Article 9(13) of the CACM Regulation. The proposal shall at least include:

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<sup>3</sup> And other elements connected to the network, such as storage equipment.

- (a) the criteria and metrics for defining the efficiency and performance of GSKs and allowing for quantitative comparison of different GSKs; and
- (b) a harmonised generation shift key methodology combined with, where necessary, rules and criteria for TSOs to deviate from the harmonised generation shift key methodology.
- (c) Changing the set point of a bidding zone internal HVDC line

#### **Article 10. Methodology for remedial actions in intraday capacity calculation**

1. In accordance with Article 25(1) of the CACM Regulation and Article 20(2) of the SO Regulation, the CE TSOs and iTCP shall individually define the RAs to be taken into account in the intraday capacity calculation.
2. In case a RA made available for the intraday capacity calculation in the CE CCR is also made available in another CCR, the TSO having control on this RA shall take care, when defining it, of a consistent use in its potential application in both CCRs to ensure operational security.
3. In accordance with Article 25(2) and (3) of the CACM Regulation, these RAs will be used for the coordinated calculation of cross-zonal capacities while ensuring operational security in real-time.
4. RAs used for intraday capacity calculation shall be aligned as much as technically feasible with the most recent ROSC CROSA. The latest version of coordinated RAs available at the time of starting step 2 according to Article 4(9) shall be used. Such RAs will be only available once ROSC CROSA is implemented in accordance with Article 37 of Core ROSC methodology.
5. In accordance with Article 25(4) of the CACM Regulation, a TSO may withhold only those RAs, which are needed to ensure operational security in real-time operation and for which no other (costly) RAs are available, or those offered to the intraday capacity calculation in other CCRs in which the concerned TSO also participates. The CCC shall monitor and report in the annual report on systematic withholdings, which were not essential to ensure operational security in real-time operation.
6. The intraday capacity calculation may only take into account those non-costly RAs which can be modelled. These non-costly RAs can be, but are not limited to:
  - (a) changing the tap position of a phase-shifting transformer (PST); and
  - (b) a topological action: opening or closing of one or more line(s), cable(s), transformer(s), bus bar coupler(s), or switching of one or more network element(s) from one bus bar to another.
  - (c) Changing the set point of an HVDC line within CE CCR
7. In accordance with Article 25(6) of the CACM Regulation, all RAs taken into account for day-ahead capacity calculation are also considered during the intraday timeframe, depending on their technical availability.
8. The RAs can be preventive or curative, i.e. affecting all CNECs or only pre-defined contingency cases, respectively.
9. CE TSOs and iTCP shall review and update the RAs taken into account in the intraday capacity calculation in accordance with Article 22.

## TITLE 4 – Update of intraday cross-zonal capacities

### Article 11. Update of intraday cross-zonal capacities remaining after the SDAC

1. The CCC shall use or recalculate the flow-based parameters resulting from CE day-ahead capacity calculation, the net positions resulting from already allocated capacities on CE CNECs in SDAC and the nominated exchanges from iTCP DA-Market to calculate the updated day-ahead cross-zonal capacities, in the form of flow-based parameters, to be used as intraday cross-zonal capacities at the intraday cross-zonal gate opening time.
2. For the updated CE intraday flow-based parameters, the PTDF values shall be the final PTDFs resulting from the day-ahead capacity calculation or the recalculation, and the RAM shall be derived as:

$$\overrightarrow{RAM}_{UID,BV} = \overrightarrow{RAM}_{f,DA} - \mathbf{PTDF}_f \overrightarrow{NP}_{AAC,DA} - \mathbf{PTDF}_{zone-to-zone} \cdot (\overrightarrow{EX}_{ref,iTCP} - \overrightarrow{EX}_{nom,iTCP})$$

*Equation 3*

with:

$\overrightarrow{RAM}_{UID,BV}$	updated remaining available margin for intraday cross-zonal capacities on CE bidding zone borders before validation
$\overrightarrow{RAM}_{f,DA}$	Re-calculated or Final remaining available margin resulting from the day-ahead capacity calculation on CE bidding zone borders
$\mathbf{PTDF}_f$	final power transfer distribution factor matrix resulting from the day-ahead capacity calculation on CE CNECs
$\overrightarrow{NP}_{AAC,DA}$	net positions resulting from already allocated capacities in SDAC
$\mathbf{PTDF}_{zone-to-zone}$	Final zone-to-zone power transfer distribution factor matrix resulting from the day-ahead capacity calculation on CE CNECs
$\overrightarrow{EX}_{ref,iTCP}$	Reference Exchanges on iTCP bidding-zone borders from day-ahead capacity calculation
$\overrightarrow{EX}_{nom,iTCP}$	Nominated Exchanges on iTCP bidding-zone borders

For each CNEC, each CE TSO and iTCP may decrease the  $RAM_{f,DA}$  by decreasing the  $AMR_{DA}$  as calculated pursuant to the day-ahead capacity calculation methodology while ensuring that there is no

undue discrimination between internal and cross-zonal exchanges in line with Article 21(1)(b)(ii) of the CACM Regulation.

Irrespective of the options provided to each TSO pursuant to this paragraph, each TSO shall ensure that on each CNEC  $\overrightarrow{RAM}_{UID}$  is non-negative.

The CE TSOs and iTCP shall validate and have the right to correct cross-zonal capacity for reasons of operational security according to Article 18.  $\overrightarrow{RAM}_{f,ID}$  shall be calculated by the CCC according to Article 18 paragraph 8.

$$\overrightarrow{RAM}_{f,ID} = \overrightarrow{RAM}_{UID,BV} - \overrightarrow{IVA}_{ID}$$

*Equation 4*

3. Where flow-based allocation is not possible on specific borders, the flow-based parameters for the borders subject to flow-based allocation shall be updated according to process described in Article 21.

## TITLE 5 - Description of the intraday capacity calculation process

### Article 12. Calculation of power transfer distribution factors and reference flows

1. The flow-based calculation is a centralised calculation, which delivers two main classes of parameters needed for the definition of the flow-based domain: the power transfer distribution factors (*PTDFs*) and the remaining available margins (*RAMs*).
2. In accordance with Article 29(3)(a) of the CACM Regulation, the CCC shall calculate the impact of a change in the net position of bidding zones and of VHs on the power flow on each CNEC (determined in accordance with the rules defined in Article 5). This influence is called the zone-to-slack *PTDF*. This calculation is performed from the CGM and the *GSK* defined in accordance with Article 9.
3. The zone-to-slack *PTDFs* are calculated by first calculating the node-to-slack *PTDFs* for each node defined in the *GSK*. These nodal *PTDFs* are derived by varying the injection of a relevant node in the CGM and recording the difference in power flow on every CNEC (expressed as a percentage of the change in injection). These node-to-slack *PTDFs* are translated into zone-to-slack *PTDFs* by multiplying the share of each node in the *GSK* with the corresponding nodal *PTDF* and summing up these products. This calculation is mathematically described as follows:

$$\mathbf{PTDF}_{\text{zone-to-slack}} = \mathbf{PTDF}_{\text{node-to-slack}} \mathbf{GSK}_{\text{node-to-zone}}$$

*Equation 4*

with

$\mathbf{PTDF}_{\text{zone-to-slack}}$  matrix of zone-to-slack *PTDFs* (columns: bidding zones and VHs; rows: CNECs)

<b>PTDF<sub>node-to-slack</sub></b>	matrix of node-to-slack <i>PTDFs</i> (columns: nodes; rows: CNECs)
<b>GSK<sub>node-to-zone</sub></b>	matrix containing the <i>GSKs</i> of all bidding zones (columns: bidding zones and VHs; rows: nodes; sum of each column equal to one)

4. The zone-to-slack *PTDFs* as calculated above can also be expressed as zone-to-zone *PTDFs*. A zone-to-slack  $PTDF_{A,l}$  represents the influence of a variation of a net position of bidding zone A on a CNEC  $l$  and assumes a commercial exchange between a bidding zone and a slack node. A zone-to-zone  $PTDF_{A \rightarrow B,l}$  represents the influence of a variation of a commercial exchange from bidding zone A to bidding zone B on CNEC  $l$ . The zone-to-zone  $PTDF_{A \rightarrow B,l}$  can be derived from the zone-to-slack *PTDFs* as follows:

$$PTDF_{A \rightarrow B,l} = PTDF_{A,l} - PTDF_{B,l}$$

Equation 5

5. The maximum zone-to-zone *PTDF* of a CNEC ( $PTDF_{z2zmax,l}$ ) is the maximum influence that any CE and iTCP exchange has on the respective CNEC, including exchanges over HVDC interconnectors which are integrated pursuant to Article 13. :

$$PTDF_{z2zmax,l} = \max_{X \in BZ \cup EVH} (PTDF_{X,l}) - \min_{X \in BZ \cup EVH} (PTDF_{X,l}) + \sum_{\substack{k \in K \\ H_{1k}, H_{2k} \in IVH}} |PTDF_{H_{1k},l} - PTDF_{H_{2k},l}|$$

Equation 6

with

$k$	a given HVDC interconnector within the CE CCR
$K$	set of all HVDC interconnectors within the CE CCR
$PTDF_{X,l}$	zone-to-slack <i>PTDF</i> of a CE bidding zone or external virtual hub X on a CNEC $l$
BZ	set of all CE bidding zones
EVH	set of all external virtual hubs
$\max_{X \in BZ \cup EVH} (PTDF_{X,l})$	maximum zone-to-slack <i>PTDF</i> of CE bidding zones or EVHs on a CNEC $l$
$\min_{X \in BZ \cup EVH} (PTDF_{X,l})$	minimum zone-to-slack <i>PTDF</i> of CE bidding zones or EVHs on a CNEC $l$
$PTDF_{H_{1k},l}$	zone-to-slack <i>PTDF</i> of internal virtual hub $H_1$ on a CNEC $l$ , with $H_1$ representing the converter station at the sending end of the HVDC interconnector $k$

$PTDF_{H2k,l}$  zone-to-slack  $PTDF$  of internal virtual hub  $H_2$  on a CNEC  $l$ , with  $H_2$  representing the converter station at the receiving end of the HVDC interconnector  $k$

6. The reference flow ( $F_{ref}$ ) is the active power flow on a CNEC based on the CGM. In case of a CNEC without contingency,  $F_{ref}$  is simulated by directly performing the direct current load-flow calculation on the CGM, whereas in case of a CNEC with contingency,  $F_{ref}$  is simulated by first applying the specified contingency and then performing the direct current load-flow calculation.
7. The expected flow  $F_i$  in the commercial situation  $i$  is the active power flow of a CNEC based on the flow  $F_{ref}$  and the deviation between the commercial situation considered in the CGM (reference commercial situation) and the commercial situation  $i$ :

$$\vec{F}_i = \vec{F}_{ref} + \mathbf{PTDF} (\overrightarrow{NP}_i - \overrightarrow{NP}_{ref})$$

*Equation 7*

with

$\vec{F}_i$  expected flow per CNEC in the commercial situation  $i$

$\vec{F}_{ref}$  flow per CNEC in the already shifted CGM (reference flow)

**PTDF** power transfer distribution factor matrix

$\overrightarrow{NP}_i$  CE net position per bidding zone in the commercial situation  $i$

$\overrightarrow{NP}_{ref}$  CE net position per bidding zone in the reference commercial situation

### **Article 13. Integration of HVDC interconnectors on bidding zone borders of the CE CCR**

1. The CE TSOs shall apply the evolved flow-based (EFB) methodology, in accordance with paragraphs 2 to 4 below, when including HVDC interconnectors on the bidding zone borders of the CE CCR, provided that both ends of the HVDC interconnector are within the same synchronous area<sup>4</sup>. In the EFB methodology, a cross-zonal exchange over an HVDC interconnector on the bidding zone borders of the CE CCR is modelled and optimised explicitly as a bilateral exchange in capacity allocation, and is constrained by the physical impact that this exchange has on all CNECs considered in the final flow-based domain used in capacity allocation and constraints modelling the maximum possible exchange of the HVDC interconnector.
2. In order to calculate the impact of the cross-zonal exchange over a HVDC interconnector pursuant to paragraph 1 on the CNECs, the converter stations of the cross-zonal HVDC shall be modelled as

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<sup>4</sup> EFB is different from AHC. AHC imposes the capacity constraints of one CCR on the cross-zonal exchanges of another CCR by considering the impact of exchanges between two capacity calculation regions. E.g. the influence of exchanges of a bidding zone which is part of a CCR applying a coordinated net transmission capacity approach is taken into account in a bidding zone which is part of a CCR applying a flow-based approach. EFB takes into account commercial exchanges over the cross-border HVDC interconnector, provided both ends are within the same CCR and synchronous area, applying the flow-based method of that CCR.

two internal virtual hubs, which function equivalently as bidding zones. Then the impact of an exchange between A and B, each being either a bidding zone or an external virtual hub, over such HVDC interconnector shall be expressed as an exchange from the bidding zone or external virtual hub A to the internal virtual hub representing the sending end of the HVDC interconnector plus an exchange from the internal virtual hub representing the receiving end of the interconnector to the bidding zone or external virtual hub B:

$$PTDF_{A \rightarrow B, l} = (PTDF_{A, l} - PTDF_{VH_1, l}) + (PTDF_{VH_2, l} - PTDF_{B, l})$$

Equation 8

With

$PTDF_{A, l}$  zone-to-slack PTDF of a bidding zone or external virtual hub A on a CNEC  $l$

$PTDF_{B, l}$  zone-to-slack PTDF of a bidding zone or external virtual hub B on a CNEC  $l$

$PTDF_{VH_1, l}$  zone-to-slack  $PTDF$  of internal Virtual hub 1 on a CNEC  $l$ , with virtual hub 1 representing the converter station at the sending end of the HVDC interconnector located in bidding zone A

$PTDF_{VH_2, l}$  zone-to-slack  $PTDF$  of internal Virtual hub 2 on a CNEC  $l$ , with virtual hub 2 representing the converter station at the receiving end of the HVDC interconnector located in bidding zone B

3. The PTDFs for the two internal virtual hubs  $PTDF_{VH_1, l}$  and  $PTDF_{VH_2, l}$  are calculated for each CNEC and they are added as two additional columns (representing two additional internal virtual bidding zones) to the existing  $PTDF$  matrix, one for each internal virtual hub.
4. The internal virtual hubs introduced by this methodology are only used for modelling the impact of an exchange through a HVDC interconnector and no orders shall be attached to these virtual hubs in the coupling algorithm. The two internal virtual hubs will have a combined net position of 0 MW, but their individual net position will reflect the exchanges over the interconnector. The flow-based net positions of these virtual hubs shall be of the same magnitude, but they will have an opposite sign.  $PTDF_{VH_1, l}$  and  $PTDF_{VH_2, l}$  of all or only a subset of CNECs can be set to zero if  $|PTDF_{VH_1, l} - PTDF_{VH_2, l}|$  is below a certain threshold. This PTDF threshold shall not exceed 1% and may be applied during the transition period preceding the Go-Live of the relevant ROSC process which implements the methodology developed pursuant to Article 76(1) of the SO Regulation. A reassessment of this PTDF threshold maximum value could be made during the implementation phase of the CE ID CC which would lead to an amendment of this article. CE TSOs shall report quarterly on the initial setup and any change of this threshold together with the impact which entails from a non-zero threshold and a due justification.
5. The CE TSOs and iTCP shall consider the HVDC interconnectors on the bidding zone borders of the CE CCR when either end of the HVDC interconnector is in different synchronous areas by using at least one external virtual hub (EVH) according to paragraphs (a) and (b) below.
  - (a) The CNECs of the CE Intraday capacity calculation in one synchronous area shall not only limit the net positions of bidding zones due to exchanges within this synchronous area but also the exchanges on CE bidding zone borders between the two synchronous areas.

- (b) CE TSOs and iTCP may impose a limit to the net position of the external virtual hub, that considers the physical limitations of the CE HVDC cables on the border and the converter stations on either endpoint of the CE HVDC cables.

#### **Article 14. Consideration of non-CE bidding zone borders**

1. Where critical network elements within the CE CCR are also impacted by electricity exchanges outside the CE CCR, the CE TSOs shall take such impact into account with a standard hybrid coupling (SHC) or with an advanced hybrid coupling (AHC).
2. Where CE TSOs consider it essential to integrate a third-country TSO in intraday capacity calculation, such integration shall be based on this methodology and mutual obligations and responsibilities for CE TSOs and the third-country TSO during the intraday capacity calculation steps pursuant to Article 4. An integrated technical counterparty agreement shall be jointly reached between all CE TSOs and the third-country TSO. It shall establish the third-country TSO as iTCP and shall ensure that the iTCP is contractually bound to this methodology and by the same obligations as the ones binding upon CE TSOs by virtue of EU regulations. All CE regulatory authorities and the iTCP regulatory authority shall regularly monitor the application of the current methodology by the iTCP.
3. When the third-country TSO operates in a country that applies the legal framework of the European Energy Market or has concluded an intergovernmental agreement on electricity markets with the European Union, the following provisions of Article 14(3) do not apply. The integrated technical counterparty agreement or the amendment of an already existing integrated technical counterparty agreement to include this methodology, respectively, is subject to the unanimous validation by all CE regulatory authorities and the iTCP regulatory authority. The integrated technical counterparty agreement or the amendment of an already existing integrated technical counterparty agreement to include this methodology, respectively, and all its subsequent amendments shall enter into force only if and insofar as they are validated by all CE regulatory authorities and the iTCP regulatory authority. Where the integrated technical counterparty agreement or the amendment of an already existing integrated technical counterparty agreement to include this methodology, respectively, has not been validated by all CE regulatory authorities and the iTCP regulatory authority, the CE TSOs shall not integrate the third-country TSO as iTCP in intraday capacity calculation.
4. In other cases, the CE TSOs shall consider using a standard hybrid coupling (SHC) or an advanced hybrid coupling (AHC).
  - (a) In the standard hybrid coupling, the CE TSOs shall consider the electricity exchanges on bidding zone borders outside the CE CCR as fixed input to the intraday capacity calculation. These electricity exchanges, defined as best forecasts of net positions and flows for HVDC lines, are defined and agreed pursuant to Article 19 of the CGMM and are incorporated in each CGM. They impact the  $F_{ref}$  and  $F_{0,Core}$  on all CNECs and thereby increase or decrease the *RAM* of the CE CNECs in order for those CNECs to accommodate the flows resulting from those exchanges. Uncertainties related to the electricity exchanges forecasts are implicitly integrated within the *FRM* of each CNEC.
  - (b) In the AHC, the CNECs of the CE Intraday capacity calculation region shall not only limit the net positions of CE bidding zones due to exchanges on bidding zone borders of the CE CCR but also the exchanges on bidding zone borders between the CE CCR and respective adjacent bidding zones.
    - i. The AHC shall only be applied in case it can be simultaneously considered in both intraday-auctions and the intraday continuous trade. In case the AHC can only be implemented in intraday auction but not yet to the intraday continuous trade, the

restrictions inherent to the AHC shall, for the intraday continuous trade, be reflected through an ATC extraction that incorporates CE and non-CE borders.

- ii. CE TSOs applying AHC shall introduce at least one external virtual hub for each AHC border, meaning that multiple interconnectors (be it HVDC or AC interconnectors) at a single AHC border can be assigned to separate EVHs.
  - iii. In the AHC, CE TSOs may impose a limit to the net position of the external virtual hubs:
    - a. for HVDC interconnectors, the limit takes into account the physical limitations of the HVDC cables on the border, and the converter stations on the CE side;
    - b. CE TSOs may consider a limit in the form of an NTC value based on the capacity calculation by the neighbouring CCR.
5. Based on the concept provided by Core TSOs including the study of its effects in intraday-capacities for the implementation of the AHC while intraday continuous trade is still in ATC-based allocation, the CE TSOs shall jointly provide a proposal for the implementation of the AHC simultaneously in both intraday-auctions and the intraday continuous trade and consider that the intraday continuous trade might be based on ATC-based allocation. The ID AHC shall aim to reduce the volume of unscheduled allocated flows on the CNECs of the CE CCR resulting from electricity exchanges on the bidding zone borders of adjacent CCRs. If before the implementation of this methodology, the AHC has been implemented on some bidding zone borders in existing flow-based capacity calculation initiatives, it may continue to be applied on those bidding zone borders as part of the day-ahead capacity calculation carried out according to this methodology until the amendments pursuant to this paragraph are implemented.
6. Until the AHC is implemented, the CE TSOs shall monitor the accuracy of non-CE exchanges in the CGM. The CE TSOs shall report in the annual report to all CE regulatory authorities the accuracy of such forecasts.

### **Article 15. Initial flow-based calculation**

1. As a first step in the intraday capacity calculation process, the CCC shall merge the individual lists of CNECs provided by all CE TSOs and iTCP in accordance with Article 5(4) into a single list, which shall constitute the initial list of CNECs.
2. Subsequently, the CCC shall use the initial list of CNECs pursuant to paragraph 1, the CGM (including the latest SIDC NP) pursuant to Article 4(7) and the GSK for each bidding zone in accordance with Article 9 to calculate the initial flow-based parameters for each ID CC TU.
3. The initial flow-based parameters shall be calculated pursuant to Article 12 and shall consist of the **PTDF** values and  $\vec{F}_{ref}$  values for each initial CNEC.

### **Article 16. Definition of final list of CNECs for intraday capacity calculation**

1. The CCC shall use the initial list of CNECs determined pursuant to Article 15 and remove those CNECs, for which the maximum zone-to-zone  $PTDF_{init}$  is below 5%. The remaining CNECs shall constitute the final list of CNECs.

2. In the first twelve months following the implementation of the ROSC methodology in accordance with Article 76(1) of the SO Regulation, the concerned CE TSO may also add an XNEC to the final list of CNECs, with no PTDF threshold, provided that:

- (a) It was loaded 100% or more before the latest CROSA and for which cross-border redispatch or countertrading were applied during that CROSA;
- (b) Its RAM shall be at least the difference between its Fmax and its loading after the CROSA.

After twelve months following the implementation of the ROSC methodology, the PTDF threshold of 5% shall apply to the XNEC to CNEC conversion, unless the amendment pursuant to paragraph (3) is approved and implemented.

3. The CE TSOs and iTCP shall study the effects and needs for the XNEC to CNEC and may propose an amendment to this methodology, which shall at least include:

- (a) the proposed PTDF threshold for XNEC to CNEC conversion;
- (b) rules for avoiding undue discrimination between internal and cross zonal exchanges for such XNECs, which shall include limitations of such exchanges in proportion to the burdening effect of their consequential flows (internal flows and allocated flows, respectively).

### **Article 17. Calculation of flow-based parameters before validation**

1. The flows assumed to result from commercial exchanges outside the CE CCR ( $F_{uaf}$ ) shall be calculated in the following steps. First, the flows on CNECs in situations without commercial exchanges are calculated by setting the corresponding net positions  $\overline{NP}_i$  to zero:

- (a) The flows without CE exchanges including exchanges on AHC borders are calculated as:

$$\vec{F}_{0,CE} = \vec{F}_{ref} - \vec{F}_{ref,CE}$$

*Equation 8a*

$$\vec{F}_{ref,CE} = \mathbf{PTDF}_{CE} \overline{NP}_{ref,CE}$$

*Equation 8b*

- (b) The flows without exchanges in the whole Continental Europe and on its links towards other synchronous areas, are calculated as:

$$\vec{F}_{0,all} = \vec{F}_{ref} - \mathbf{PTDF}_{all} \overline{NP}_{ref,all}$$

*Equation 8c*

For this calculation, the CCC shall use the GSKs provided by the concerned TSOs, and when these are not available, the CCC shall use a GSK where all nodes with positive injections participate in shifting in proportion to their injection.

- (c) The flow assumed to result from commercial exchanges outside the CE CCR ( $F_{uaf}$ ) is then calculated for each CNEC as follows:

$$\vec{F}_{uaf} = \vec{F}_{0,CE} - \vec{F}_{0,all}$$

Equation 8d

with

$\vec{F}_{0,CE}$	flow per CNEC in a situation without commercial exchanges within the CE CCR and on the AHC borders
$\vec{F}_{ref}$	flow per CNEC in the CGM from the latest AACs (which already contains the flows originated from DA and ID market)
$\vec{F}_{ref,CE}$	flow originated from the CE net positions including VHS which are already included in the CGM
<b>PTDF<sub>CE</sub></b>	power transfer distribution factor matrix for all bidding zones and VHS of the CE CCR
<b>PTDF<sub>all</sub></b>	power transfer distribution factor matrix for all bidding zones and VHS of Continental Europe, and connection points of the bidding zones of Continental Europe with the bidding zones of other synchronous areas
$\vec{NP}_{ref,CE}$	CE net position per bidding zone and VH included in the CGM (resulting from SDAC and the SIDC exchanges already included in the CGM), excluding the net positions' changes resulting from the application of remedial actions in the previous CROSA process
$\vec{NP}_{ref,all}$	total net positions included in the CGM, of all bidding zones and VHS of Continental Europe and the island of Ireland, and connection points of the bidding zones of Continental Europe with the bidding zones of other synchronous areas
$\vec{F}_{0,all}$	flow per CNEC in a situation without any commercial exchange between bidding zones and VHS within Continental Europe, and any commercial exchange between bidding zones within Continental Europe and bidding zones located in other synchronous areas, and between the island of Ireland and bidding zones located in other synchronous areas
$\vec{F}_{uaf}$	unscheduled allocated flow, i.e. the flow per CNEC resulting from commercial exchanges outside CE CCR excluding the AHC borders

- Based on the initial flow-based domain and on the final list of CNECs, the CE CCC shall calculate for each CNEC the RAM before validation, according to the equation:

$$\vec{RAM}_{bv} = \vec{F}_{max} - \vec{FRM} - \vec{F}_{ref}$$

Equation 12

$\vec{F}_{max}$  Maximum active power flow pursuant to Article 6

$\overline{FRM}$	Flow reliability margin pursuant to Article 8
$\overline{RAM}_{bv}$	Remaining available margin before validation

3. In case an allocation constraint restricts the CE net positions pursuant to Article 7(2)(a), it shall be added as an additional row to the  $\mathbf{PTDF}_f$  matrix and the  $\overline{RAM}_{bv}$  vector as follows:
  - (a) the *PTDF* value in the column related to the bidding zone applying the concerned allocation constraint is set to 1 for an export limit and -1 for an import limit, respectively;
  - (b) the *PTDF* values in the columns related to all other bidding zones are set to zero; and
  - (c) The *RAM* value is set to the amount of the allocation constraint, corrected for the net position included in the CGM.

### **Article 18. Validation of flow-based parameters**

1. The CE TSOs and iTCP shall validate and have the right to correct cross-zonal capacity for reasons of operational security during the validation process.
2. Each CE TSO shall validate and have the right to decrease the *RAM* for reasons of operational security during the individual validation. The adjustment due to individual validation is called ‘individual validation adjustment’ (*IVA*) and it shall have a positive value, i.e. it may only reduce the *RAM*. *IVA* may reduce the *RAM* only to the minimum degree that is needed to ensure operational security, and only after all the expected available costly and non-costly remedial actions pursuant to Article 22 of the SO Regulation are considered. In case certain remedial actions are not implemented, such as countertrading, CE TSOs and iTCP shall ensure their implementation within twelve months following the application of IDCC pursuant to Article 4(2).
3. The individual validation adjustment may be done in the following situations:
  - (a) an occurrence of an exceptional contingency or forced outage as defined in Article 3(39) and Article 3(77) of the SO Regulation;
  - (b) when all available costly and non-costly RAs are not sufficient to ensure operational security;
  - (c) a mistake in input data, that leads to an overestimation of cross-zonal capacity from an operational security perspective; and/or
  - (d) a potential need to cover reactive power flows on certain CNECs.
4. If all available costly and non-costly RAs are not sufficient to ensure operational security on an internal network element with a specific contingency, which is not defined as a CNEC, the concerned CE TSO may exceptionally add such internal network element to the final list of CNECs, provided that:
  - (a) Its maximum zone-to-zone *PTDF* is equal or above the threshold of 5% referred to in Article 16(1);

- (b) Its voltage level must be 110 kV or above;
  - (c) Its RAM shall be the highest RAM ensuring operational security considering all available costly and non-costly RAs, with the floor of zero.
5. When performing the validation, the CE TSOs and iTCP shall consider the operational security limits pursuant to Article 6(1). While considering such limits, they may consider additional grid models, and other relevant information. Therefore, the CE TSOs and iTCP shall use the tools developed by the CCC for analysis, but may also employ verification tools not available to the CCC.
  6. In case of a required reduction due to situations as defined in paragraph 3(a), a TSO may use a positive value for *IVA* for its own CNECs or adapt the allocation constraints, pursuant to Article 7, to reduce the cross-zonal capacity for its bidding zone.
  7. In case of a required reduction due to situations as defined in paragraph 3(b), (c), and (d), a TSO may use a positive value for *IVA* for its own CNECs. In case of a situation as defined in paragraph 3(c), a CE TSO may, as a last resort measure, request a common decision to launch the default flow-based parameters pursuant to Article 20.
  8. After individual validation adjustments, the remaining available margin before validation ( $\overrightarrow{RAM}_{bv}$ ) shall be adjusted for the flows resulting from net positions or already allocated capacities resulting from the SIDC in accordance with Article 4(5)c. The final  $RAM_f$  shall be calculated by the CCC for each CNEC and allocation constraint according to Equation 13.

$$\overrightarrow{RAM}_f = \overrightarrow{RAM}_{bv} - \overrightarrow{IVA} - \mathbf{PTDF}_{CE} \overrightarrow{NP}_{AAC,IDadd} - \mathbf{PTDF}_{zone-to-zone} \cdot (\overrightarrow{EX}_{ref,iTCP} - \overrightarrow{EX}_{nom,iTCP})$$

Equation 13

with

$\overrightarrow{RAM}_f$	final remaining available margin
$\overrightarrow{RAM}_{bv}$	remaining available margin before validation
$\overrightarrow{IVA}$	individual validation adjustment
$\mathbf{PTDF}_{CE}$	final power transfer distribution factor matrix resulting from the intraday capacity calculation
$\overrightarrow{NP}_{AAC,IDadd}$	CE net positions resulting from SIDC which are not already included in the CGM
$\overrightarrow{EX}_{ref,iTCP}$	Reference Exchanges on iTCP bidding-zone borders already present in CGM
$\overrightarrow{EX}_{nom,iTCP}$	Nominated Exchanges on iTCP bidding-zone borders

9. Any reduction of cross-zonal capacities during the validation process shall be communicated and justified to market participants and to all CE regulatory authorities in accordance with Article 23 and Article 25, respectively.

10. Every three months, the CCC shall provide in the quarterly report all the information on the reductions of cross-zonal capacity and exceptional additions of internal network elements. The quarterly report shall include at least the following information for each CNEC of the pre-solved domain affected by a reduction and for each ID CC TU:
  - (a) the identification of the CNEC;
  - (b) all the corresponding flow components pursuant to Article 23(2)(b)(vii);
  - (c) the volume of reduction and, if applicable, the shadow price of the CNEC resulting from SIDC and the estimated market loss of economic surplus due to the reduction;
  - (d) the detailed reason(s) for reduction, including the operational security limit(s) that would have been violated without reductions, specifying network elements on which these limits would have been violated, and under which circumstances they would have been violated, as well as the list of remedial actions with their detailed information, considered prior to the reduction;
  - (e) the forecast flow in the CGM used for D-1 capacity calculation, in the CGM considered for the intraday capacity calculation within which the capacity reduction occurred, in the first CGM established after the considered intraday calculation and the realised flow, before (and when relevant after) contingency;
  - (f) if an internal network element with a specific contingency was exceptionally added to the final list of CNECs pursuant to Article 16 and Article 18(4):
    - i. a justification why adding the network element with a specific contingency to the list was the only way to ensure operational security;
    - ii. the name or the identifier of the internal network element with a specific contingency;
    - iii. the ID CC TUs for which the internal network element with a specific contingency was added to the list;
    - iv. the maximum zone-to-zone PTDF calculated on the basis of the methodology in Article 12, calculated on the CGM for TUs defined in paragraph iii;
    - v. for the cases under Article 16(2), the amount of total, internal, loop and allocated flows at the considered exceptionally added XNEC; and
    - vi. the information referred to in paragraphs (b), (c) and (e) above.
  - (g) the remedial actions included in the CGM before the intraday capacity calculation;
  - (h) in case of reduction due to individual validation, the TSO invoking the reduction; and
  - (i) the proposed measures to avoid similar reductions in the future.
11. The quarterly report shall also include at least the following aggregated information:
  - (a) statistics on the number, causes, volume and estimated loss of economic surplus of applied reductions by different TSOs; and
  - (b) general measures to avoid cross-zonal capacity reductions in the future.

12. When a given CE TSO reduces capacity for its CNECs in more than 1% of ID CC TUs of the analysed quarter, the concerned TSO shall provide to the CCC a detailed report and action plan describing how such deviations are expected to be alleviated and solved in the future. This report and action plan shall be included as an annex to the quarterly report.
13. The final flow-based parameters shall consist of  $\mathbf{PTDF}_f$  and  $\overrightarrow{RAM}_f$  for CNECs and allocation constraints of the pre-solved domain.

### **Article 19. Intraday capacity calculation fallback procedure**

According to Article 21(3) of the CACM Regulation, when the intraday capacity calculation for specific ID CC TUs does not lead to the final flow-based parameters due to, inter alia, a technical failure in the tools, an error in the communication infrastructure, or corrupted, missing or delayed input data, the CE TSOs, iTCP and the CCC shall define the missing parameters by calculating the default flow-based parameters. The calculation of default flow-based parameters shall be based on previously calculated flow-based parameters for the same delivery market time unit. The latest (intraday or day-ahead) available flow-based domain, which may be corrected during local validation in accordance with Article 18, for the considered delivery ID CC TU is first converted to zero CE balance. The RAM on each CNEC (including allocation constraints) is then decreased by the adjustments for minRAM, if present. The redundant constraints are removed, and pre-solved constraints are adjusted for the CE net positions resulting from the SDAC and the SIDC.

### **Article 20. ATC extraction**

1. This Article describes the methodology for converting flow-based parameters into available transmission capacities (hereafter referred to as “ATCs”) for bidding-zone borders that are not operated using flow-based capacity allocation mechanisms. This includes both calculation of ATCs for intraday continuous trading in ATC allocation and for iTCP borders.
2. In case the SIDC intraday continuous trade is unable to accommodate flow-based parameters, the CCC shall convert the flow-based parameters into ATCs for each CE-oriented bidding zone border and each ID CC TU. SIDC intraday continuous trade without flow-based cannot open as long as this conversion towards available transmissions capacities is done. The CE TSOs may delegate this responsibility to a third party.
3. The CCC shall convert flow-based parameters into ATCs for each iTCP bidding zone border for each ID CC TU pursuant to paragraph 8.
4. If SIDC intraday continuous trade is able to accommodate flow-based parameters, the ATC extraction described in this Article shall continue to be performed for all CE and iTCP borders. For CE internal bidding-zone borders, the extracted ATCs may continue to be used as fallback values in case of operational fallback scenarios.
5. The flow-based parameters shall serve as the basis for the determination of the ATCs for SIDC without flow-based and iTCP borders. As the selection of a set of ATCs from the flow-based parameters leads to an infinite set of choices, the algorithm provided in paragraph 5 determines the ATCs.
6. The following inputs are required to calculate ATCs for each ID CC TU:
  - (a) final flow-based parameters ( $\mathbf{PTDF}_f$  and  $\overrightarrow{RAM}_f$ ) as calculated pursuant to Article 18 or final flow-based parameters ( $\mathbf{PTDF}_f$  and  $\overrightarrow{RAM}_{UID,BV}$ ) as calculated pursuant to Article 11.

- (b) if defined, the global allocation constraints shall be assumed to constrain the CE and iTCP net positions pursuant to Article 7(5), and shall be described following the methodology described in Article 17(3). Such constraints shall be adjusted for offered cross-zonal capacities on the non-CE bidding zone borders.
7. the final PTDFs ( $\mathbf{PTDF}_f$  and  $\mathbf{PTDF}_{f,DA}$ ) of all or only a subset of CNECs can be adjusted before the ID ATC extraction by setting the positive zone-to-zone PTDFs below a certain threshold to zero. The following outputs are the outcomes of the calculation for each TU:
- (a) ATCs ; and
- (b) constraints with zero margin before and after the calculation of ATCs.
8. The calculation of the ATCs is an iterative procedure, which gradually calculates ATCs for each ID CC TU, while respecting the constraints of the final flow-based parameters pursuant to paragraph 6:
- (a) The initial ATCs are set equal to zero for each CE and iTCP oriented bidding zone border, i.e.:

$$\overrightarrow{ATC}_{k=0} = 0$$

with

$$\overrightarrow{ATC}_{k=0} \quad \text{the initial ATCs before the first iteration}$$

- (b) The remaining available margin at iteration zero is either equal to the final remaining available margin ( $\overrightarrow{RAM}_f$ ) according to Article 18(8) or the updated remaining available margin for intraday cross-zonal capacities ( $\overrightarrow{RAM}_{UID}$ ) according to Article 11(1):

$$\begin{aligned} \overrightarrow{RAM}_{ATC}(0) &= \overrightarrow{RAM}_f \\ \text{or } \overrightarrow{RAM}_{ATC}(0) &= \overrightarrow{RAM}_{UID} \end{aligned}$$

*Equation 14*

with

$$\overrightarrow{RAM}_{ATC}(0) \quad \text{remaining available margin for ATC calculation at iteration } k=0$$

$$\overrightarrow{RAM}_f \quad \text{remaining available margin of the flow-based parameters pursuant to paragraph 3.}$$

$$\overrightarrow{RAM}_{UID} \quad \text{updated remaining available margin for intraday cross-zonal capacities}$$

- (c) In the case when there are negative RAMs, negative ATCs are calculated for CNECs with negative  $\overrightarrow{RAM}_{ATC}(0)$  according to the following procedure:
- i. Per CNEC with negative remaining available margin for ATC calculation at iteration  $k=0$  ( $\overrightarrow{RAM}_{ATC}(0)$ ) negative ATCs are calculated for all oriented bidding zone borders with positive PTDFs according to Equation 14a:

$$ATC_{A \rightarrow B, CNEC i} = \frac{pPTDF_{A \rightarrow B, CNEC i}}{\sum_{(A,B) \in CE \text{ contract paths with positive z2zPTDFs}} PTDF_{A \rightarrow B}^2} RAM_{ATC, CNEC i}(0)$$

Equation 14a

with

$ATC_{A \rightarrow B, CNEC i}$	negative ATC for the oriented bidding zone border A to B determined by CNEC i
$A, B$	CE & iTCP bidding zones
$RAM_{ATC, CNEC i}(0)$	remaining available margin for ATC calculation at iteration $k=0$ of CNEC i
$pPTDF_{A \rightarrow B, CNEC i}$	Final positive zone-to-zone PTDF of the oriented bidding zone border A to B

- ii. In case for an oriented CE and iTCP bidding zone border more than one negative ATC has been calculated according to Equation 14a, then for each oriented CE and iTCP bidding zone border the most negative ATC is determined over all CNECs with negative remaining available margin.

$$\overrightarrow{ATC}_{A \rightarrow B} = \min(\overrightarrow{ATC}_{A \rightarrow B, CNEC i})$$

Equation 14b

- iii. After extraction of negative ATCs a scaling factor ( $SF$ ) is calculated for each CNEC with negative remaining available margin:

$$SF_{CNEC i} = \left| \frac{RAM_{ATC, CNEC i}(0)}{\sum_{(A,B) \in Core \text{ contract paths with positive z2zPTDFs}} PTDF_{A \rightarrow B, CNEC i} \overrightarrow{ATC}_{A \rightarrow B}} \right|$$

Equation 14c

The final scaling factor ( $SF_{final}$ ) is the maximum of all calculated scaling factors:

$$SF_{final} = \max(SF_{CNEC i})$$

Equation 14d

- iv. The final negative ATCs are calculated by scaling the negative ATCs with the final scaling factor:

$$\overrightarrow{ATC}_{negative, final} = \overrightarrow{ATC}_{A \rightarrow B} SF_{final}$$

Equation 14e

- (d) Before starting the iterative method applied to calculate the positive ATCs all the remaining available margins for ATC calculation at iteration  $k=0$  ( $\overrightarrow{RAM}_{ATC}(0)$ ) shall be adjusted to be non-negative:

$$\overrightarrow{RAM}_{ATC}(0) = \max(0, \overrightarrow{RAM}_{ATC}(0))$$

Equation 14f

with

$\overrightarrow{RAM}_{ATC}(0)$  remaining available margin for ATC calculation  
at iteration  $k=0$

The iterative method applied to calculate the positive ATCs consists of the following actions for each iteration step  $k$ :

- i. for each CNEC and allocation constraint of the flow-based parameters pursuant to paragraph 5, calculate the remaining available margin based on ATCs at iteration  $k-1$

$$\overrightarrow{RAM}_{ATC}(k) = \overrightarrow{RAM}_{ATC}(0) - \mathbf{pPTDF}_{zone-to-zone} \overrightarrow{ATC}_{k-1}$$

*Equation 14g*

with

$\overrightarrow{RAM}_{ATC}(k)$  remaining available margin for ATC calculation  
at iteration  $k$

$\overrightarrow{ATC}_{k-1}$  ATCs at iteration  $k-1$

$\mathbf{pPTDF}_{zone-to-zone}$  positive zone-to-zone power transfer distribution  
factor matrix

- ii. for each CNEC, share  $\overrightarrow{RAM}_{ATC}(k)$  with equal shares among the CE and iTCP oriented bidding zone borders with strictly positive zone-to-zone power transfer distribution factors on this CNEC;
- iii. from those shares of  $\overrightarrow{RAM}_{ATC}(k)$ , the maximum additional bilateral oriented exchanges are calculated by dividing the share of each CE and iTCP oriented bidding zone border by the respective positive zone-to-zone PTDF.
- iv. for each CE and iTCP oriented bidding zone border,  $\overrightarrow{ATC}_k$  is calculated by adding to  $\overrightarrow{ATC}_{k-1}$  the minimum of all maximum additional bilateral oriented exchanges for this border obtained over all CNECs and allocation constraints as calculated in the previous step;
- v. iterate until the difference between the sum of ATCs of iterations  $k$  and  $k-1$  is smaller than 1kW;
- vi. the resulting positive ATCs for borders without flow-based allocation mechanisms stem from the ATC values determined in iteration  $k$ , after rounding down to integer values;
- vii. at the end of the calculation, there are some CNECs and allocation constraints with no remaining available margin left. These are, together with the CNECs and allocation constraints with initially negative  $\overrightarrow{RAM}_{ATC}(0)$ , the limiting constraints for the calculation of ATCs

- (e) Positive zone-to-zone PTDF matrix ( $\mathbf{pPTDF}_{zone-to-zone}$ ) for each CE and iTCP oriented bidding zone border shall be calculated from the  $\mathbf{PTDF}_{CE}$  as follows for HVDC interconnectors integrated pursuant to Article 13. , Equation 8 shall be used):

$$pPTDF_{zone-to-zone,A \rightarrow B} = \max(0, PTDF_{zone-to-slack,A} - PTDF_{zone-to-slack,B})$$

Equation 15a

with

$pPTDF_{zone-to-zone,A \rightarrow B}$  positive zone-to-zone *PTDFs* for CE and iTCP oriented bidding zone border *A* to *B*

$PTDF_{zone-to-slack,m}$  zone-to-slack *PTDF* for CE and iTCP bidding zone border *m*

- (f) For bidding-zone borders consisting of both HVDC and AC interconnectors, the capacity share of the respective bidding-zone border shall be split between AC and HVDC within the ATC Extraction algorithm.
- (g) The final ATCs per CE and iTCP oriented bidding zone border are the minimum from positive and negative ATCs:

$$\overrightarrow{ATC}_{final} = \min(\overrightarrow{ATC}_k, \overrightarrow{ATC}_{negative,final})$$

Equation 15b

9. With the aim to maximize capacities whilst maintaining operational security, a reassessment of all the parameters defined in Article 20 and Article 21 shall be performed during both parallel run steps outlined in Article 27 of this methodology.

### Article 21. Consideration of iTCP capacities

1. The ATCs for iTCP borders calculated pursuant to Art. 20(8) shall be considered in the flow-based domain for those IDCCs in which capacity is allocated via the flow-based allocation process by:
- (a) Adjusting the RAMs of each CNEC in the CE flow-based domain according to equation 16

$$\overrightarrow{RAM}_{fb,ID} = \overrightarrow{RAM}_{f,ID} - \mathbf{pPTDF}_{zone-to-zone} \overrightarrow{ATC}_{non-fb}$$

Equation 16

With

$\overrightarrow{RAM}_{fb,ID}$  Final remaining available margin for flow-based domain

$pPTDF_{zone-to-zone}$  Positive zone-to-zone power transfer distribution factor matrix

$\overrightarrow{ATC}_{non-fb}$  ATCs for bidding-zone borders where SIDC is unable to accommodate flow-based parameters and iTCP bidding-zone borders

- (b) removing the PTDFs of non-flow-based bidding zones from the flow-based parameters given to the SIDC
- (c) removing redundant  $\overrightarrow{RAM}_{fb,ID}$  and  $PTDF_f$  values which may be removed without impacting the possible allocation of cross-zonal capacity.

## Article 22. Reviews and updates

1. Based on Article 3(f) of the CACM Regulation and in accordance with Article 27(4) of the same Regulation, all TSOs shall regularly and at least once a year review and update the key input and output parameters listed in Article 27(4)(a) to (d) of the CACM Regulation.
2. If the operational security limits, critical network elements, contingencies and allocation constraints used for intraday capacity calculation inputs pursuant to Article 5 and Article 7 need to be updated based on this review, the CE TSOs and iTCP shall publish the changes at least 1 week before their implementation.
3. In case the review proves the need for an update of the reliability margins, the CE TSOs and iTCP shall publish the changes at least one month before their implementation.
4. The review of the list of RAs taken into account in the intraday capacity calculation, as defined in Article 10(4), shall include at least an evaluation of the efficiency of specific PSTs and the topological RAs considered from the CROSA process.
5. In case the review proves the need for updating the application of the methodologies for determining GSKs, critical network elements and contingencies referred to in Articles 22 to 24 of the CACM Regulation, changes have to be published at least three months before their implementation.
6. Any changes of parameters listed in Article 27(4) of the CACM Regulation shall be communicated to market participants, all CE and iTCP regulatory authorities and ACER.
7. The CE TSOs and iTCP shall communicate the impact of any change of allocation constraints and parameters listed in Article 27(4)(d) of the CACM Regulation to market participants, all CE and iTCP regulatory authorities and ACER. If any change leads to an adaptation of the methodology, the CE TSOs and iTCP shall make a proposal for amendment of this methodology according to Article 9(13) of the CACM Regulation.
8. The CE TSOs shall coordinate with iTCP when they review the methodology or its parameters.

## Article 23. Publication of data

1. In accordance with Article 3(f) of the CACM Regulation aiming at ensuring and enhancing the transparency and reliability of information to all regulatory authorities and market participants, all CE TSOs and iTCP and the CCC shall regularly publish the data on the intraday capacity calculation process pursuant to this methodology as set forth in paragraph 2 on a dedicated online communication platform where capacity calculation data for the whole CE CCR shall be published. To enable market participants to have a clear understanding of the published data, all CE TSOs and iTCP and the CCC shall develop a handbook and publish it on this communication platform. This handbook shall include at least a description of each data item, including its unit and underlying convention.
2. The CE TSOs and iTCP and the CCC shall publish at least the following data items (in addition to the data items and definitions of Commission Regulation (EU) No 543/2013 on submission and publication of data in electricity markets):
  - (a) cross-zonal capacities in accordance with Article 4(2) by the deadlines set therein;
  - (b) the following information for intraday cross-zonal capacity calculation and re-calculation pursuant to Article 4(2)(b) to (e) shall be published by the deadlines established therein:
    - i. maximum and minimum possible net position of each bidding zone;
    - ii. maximum possible bilateral exchanges between all pairs of CE bidding zones;
    - iii. if applicable, ATCs for intraday continuous trading in ATC allocation;
    - iv. ATCs for iTCP borders
    - v. names of CNECs (with geographical names of substations where relevant and separately for CNE and contingency) and allocation constraints of the final flow-based parameters before pre-solving and the TSO defining them;
    - vi. for each CNEC of the final flow-based parameters before pre-solving, the EIC code of CNE and Contingency;
    - vii. for each CNEC of the final flow-based parameters before pre-solving, the method for determining  $I_{max}$  in accordance with Article 6(2)(a);
    - viii. detailed breakdown of *RAM* for each CNEC of the final flow-based parameters before pre-solving:  $I_{max}$ ,  $U$ ,  $F_{max}$ ,  $FRM$ ,  $F_{ref}$ ,  $F_{0,CE}$ ,  $F_{0,all}$ ,  $F_{ref,CE}$ ,  $F_{uaf}$ ,  $IVA$ ;
    - ix. value of each allocation constraint before pre-solving;
    - x. indication of whether default flow-based parameters were applied;
    - xi. indication of whether a CNEC is redundant or not;
    - xii. information about the validation reductions:
      - the identification of the CNEC;
      - the TSO invoking the reduction;
      - the volume of reduction (*IVA*);

- the detailed reason(s) for reduction in accordance with Article 18(2) and 18(3), including the operational security limit(s) that would have been violated without reductions, and under which circumstances they would have been violated;
  - if an internal network elements with a specific contingency was exceptionally added to the final list of CNECs during validation: (i) a justification of the reasons of why adding the internal network elements with a specific contingency to the list was the only way to ensure operational security, (ii) the name or identifier of the internal network elements with a specific contingency, along with the calculated set of PTDFs;
- (c) the following forecast information contained in the CGM for each ID CC TU shall be published by the deadlines established in Article 4(2):
- i. vertical load for each CE bidding zone and each TSO;
  - ii. production for each CE bidding zone and each TSO;
  - iii. CE net position for each CE bidding zone and each TSO;
  - iv. reference net positions of all bidding zones in synchronous areas Continental Europe and island of Ireland and reference exchanges for all HVDC interconnectors within synchronous area Continental Europe, between synchronous area Continental Europe and other synchronous areas and between synchronous area island of Ireland and other synchronous areas; and
- (d) in case of intraday auctions, two hours after the auction, the information pursuant to paragraph 2(b)(vii) shall be complemented by the following information for each CNEC and allocation constraint of the final flow-based parameters.
- i. shadow prices;
  - ii. flows resulting from net positions obtained at intraday auctions.
- (e) every six months, the publication of an up-to-date static grid model by each CE TSO and iTCP.
- (f) The CCC shall include in its quarterly report as defined in Article 25(6) the flows resulting from net positions resulting from intraday auctions on each CNEC and allocation constraint of the final flow-based parameters.
3. Individual CE TSO or iTCP may withhold the information referred to in paragraph 2(b)(iv), 2(b)(v) and 2(e) if it is classified as sensitive critical infrastructure protection related information in their Member States as provided for in point (d) of Article 2 of the Council Directive 2008/114/EC of 8 December 2008 on the identification and designation of European critical infrastructures and the assessment of the need to improve their protection. In such a case, the information referred to in paragraph 2(b)(iv) and 2(b)(v) shall be replaced with an anonymous identifier which shall be stable for each CNEC across all ID CC TUs. The anonymous identifier shall also be used in the other TSO communications related to the CNEC, including the static grid model pursuant to paragraph 2(e) and when communicating about an outage or an investment in infrastructure. The information about which information has been withheld pursuant to this paragraph shall be published on the communication platform referred to in paragraph 1.

4. Any change in the identifiers used in paragraphs 2(b)(iv), 2(b)(v) and 2(e) shall be publicly notified at least one month before its entry into force. The notification shall at least include:
  - (a) the day of entry into force of the new identifiers; and
  - (b) the correspondence between the old and the new identifier for each CNEC.
5. Pursuant to Article 20(9) of the CACM Regulation, the CE TSOs and iTCP shall establish and make available a tool which enables market participants to evaluate the interaction between cross-zonal capacities and cross-zonal exchanges between bidding zones. The tool shall be developed in coordination with stakeholders and all CE and iTCP regulatory authorities and updated or improved when needed.
6. The CE regulatory authorities may request additional information to be published by the TSOs. For this purpose, all CE and iTCP regulatory authorities shall coordinate their requests among themselves and consult it with stakeholders and ACER. Each CE TSO or iTCP may decide not to publish the additional information, which was not requested by its competent regulatory authority.

#### **Article 24. Quality of the data published**

1. No later than six months before the implementation of this methodology in accordance with Article 26(2)(b), the CE TSOs and iTCP shall jointly establish and publish a common procedure for monitoring and ensuring the quality and availability of the data on the dedicated online communication platform as referred to in Article 23. When doing so, they shall consult with relevant stakeholders and all CE and iTCP regulatory authorities.
2. The procedure pursuant to paragraph 1 shall be applied by the CCC, and shall consist of continuous monitoring process and reporting in the annual report. The continuous monitoring process shall include the following elements:
  - (a) individually for each TSO and for the CE CCR as a whole: data quality indicators, describing the precision, accuracy, representativeness, data completeness, comparability and sensitivity of the data;
  - (b) the ease-of-use of manual and automated data retrieval;
  - (c) automated data checks, which shall be conducted in order automatically to accept or reject individual data items before publication based on required data attributes (e.g. data type, lower/upper value bound, etc.); and
  - (d) satisfaction survey performed annually with stakeholders and the CE and iTCP regulatory authorities.

The quality indicators shall be monitored in daily operation and shall be made available on the platform for each dataset and data provider such that users are able to take this information into account when accessing and using the data.

3. The CCC shall provide in the annual report at least the following:
  - (a) the summary of the quality of the data provided by each data provider;
  - (b) the assessment of the ease-of-use of data retrieval (both manual and automated);
  - (c) the results of the satisfaction survey performed annually with stakeholders and all CE and iTCP regulatory authorities; and

- (d) suggestions for improving the quality of the provided data and/or the ease-of-use of data retrieval.
4. The CE TSOs and iTCP shall commit to a minimum value for at least some of the indicators mentioned in paragraph 2, to be achieved by each TSO individually on average on a monthly basis. Should a TSO fail to fulfil at least one of the data quality requirements, this TSO shall provide to the CCC within one month following the failure to fulfil the data quality requirement, detailed reasons for the failure to fulfil data quality requirements, as well as an action plan to correct past failures and prevent future failures. No later than three months after the failure, this action plan shall be fully implemented and the issue resolved. This information shall be published on the online communication platform and in the annual report.

## **Article 25. Monitoring and reporting**

1. The CE TSOs and iTCP shall provide to the CE and iTCP regulatory authorities data on intraday capacity calculation for the purpose of monitoring its compliance with this methodology and other relevant legislation.
2. At least, the information on non-anonymized names of CNECs for final flow-based parameters before pre-solving as referred to in Article 23(2)(b)(iv) and (v) shall be provided to all CE and iTCP regulatory authorities on a monthly basis for each CNEC and each ID CC TU. This information shall be in a format that allows easily to combine the CNEC names with the information published in accordance with Article 23(2).
3. In addition, each month, starting in January 2025 with data for December 2024, the CE TSOs and iTCP shall provide the CE and iTCP regulatory authorities and ACER with the following data for each TU and each CNEC:
  - (a) final zone-to-hub PTDF values for all modelled bidding zones;
  - (b) CE net positions pursuant to Article 4(5); and
  - (c) flow components, consisting of the internal flow, loop flows (total loop flow and particular loop flows created by each bidding zone) and PST flow.
4. The CE and iTCP regulatory authorities may request additional information to be provided by the TSOs. For this purpose, all CE and iTCP regulatory authorities shall coordinate their requests among themselves. Each CE TSO and iTCP may decide not to provide the additional information, which was not requested by its competent regulatory authority.
5. The CCC, with the support of the CE TSOs and iTCP where relevant, shall draft and publish an annual report satisfying the reporting obligations set in Articles 10, 14, 23 and 26 of this methodology:
  - (a) according to Article 10(5), the CE TSOs and iTCP shall report to the CE CCC on systematic withholdings which were not essential to ensure operational security in real-time operation.
  - (b) according to Article 14(5), the CE TSOs and iTCP shall monitor the accuracy of non-CE exchanges in the CGM.
  - (c) according to Article 24(3), the CCC shall monitor and report on the quality of the data published on the dedicated online communication platform as referred to in Article 23, with supporting detailed analysis of a failure to achieve sufficient data quality standards by the concerned TSOs, where relevant.

- (d) according to Article 27(4), after the implementation of this methodology, the CE TSOs and iTCP shall report on their continuous monitoring of the effects and performance of the application of this methodology.
6. The CCC, with the support of the CE TSOs and iTCP where relevant, shall draft and publish a quarterly report satisfying the reporting obligations set in Articles 7, 19 and 27 of this methodology:
- (a) according to Article 7. (3)(b), the CCC shall collect all reports analysing the effectiveness of relevant allocation constraints, received from the concerned TSOs during the period covered by the report, and annex those to the quarterly report.
  - (b) according to Article 18(10), the CCC shall provide all information on the reductions of cross-zonal capacity, with a supporting detailed analysis from the concerned TSOs where relevant.
  - (c) according to Article 27(4), during the implementation of this methodology, the CE TSOs and iTCP shall report on their continuous monitoring of the effects and performance of the application of this methodology.
  - (d) according to Article 23(2)(f), CE TSOs and iTCP shall report on flows resulting from net positions resulting from the intraday auctions, on each CNEC and allocation constraint of the final flow-based parameters.
7. The published annual and quarterly reports may withhold commercially sensitive information or sensitive critical infrastructure protection related information as referred to in Article 23(3). In such a case, the CE TSOs and iTCP shall provide the CE and iTCP regulatory authorities with a complete version where no such information is withheld.

## **TITLE 7 - Implementation**

### **Article 26. TSOs' analyses**

1. Based on the results of the Capacity Improvement Study, which was conducted pursuant to Article 25 of the 4th Core IDCCM Amendment as a common assessment, the CE TSOs and iTCP shall continue in the CE CCR with the optimised process timings in order to utilise the latest possible Common Grid Models (CGMs).
2. CE TSOs and iTCP shall continue to analyse possible measures to improve cross-zonal capacities in the intraday timeframe. For this purpose, they shall study the outcomes of the minRAM study currently conducted in Core CCR. They shall afterwards decide whether to use the study results directly or conduct a new CE study on the subject.
3. CE TSOs and iTCP shall reflect in future amendments the ensuing decision resulting from that study. If required, following the expected amendments to the CACM Regulation, this methodology shall be revised accordingly.
4. CE TSOs and iTCP shall monitor on an annual basis for each CNEC the level of MACZT in the intraday timeframe and include it to the Annual reports.

## **Article 27. Timescale for implementation**

1. The TSOs of the CE CCR shall publish this methodology without undue delay after the decision has been taken by ACER in accordance with Article 9(12) of the CACM Regulation.
2. The TSOs of the CE CCR shall implement this methodology no later than 24 months after the successful implementation of CE day-ahead capacity calculation.
3. The implementation process, which shall start with the entry into force of this methodology and finish by the deadlines established in paragraph 2, shall consist of the following steps:
  - (a) internal parallel run, during which the TSOs shall test the operational processes for the intraday capacity calculation inputs, the intraday capacity calculation process and the intraday capacity validation and develop the appropriate IT tools and infrastructure;
  - (b) external parallel run, during which the TSOs will continue testing their internal processes and IT tools and infrastructure. In addition, the CE TSOs and iTCP will involve the CE NEMOs to test the implementation of this methodology, and market participants to test the effects of applying this methodology on the market. In accordance with Article 20(8) of CACM Regulation, this phase shall not be shorter than 6 months.
4. During the internal and external parallel runs, the CE TSOs and iTCP shall continuously monitor the effects and the performance of the application of this methodology. For this purpose, they shall develop, in coordination with the CE and iTCP regulatory authorities, ACER and stakeholders, the monitoring and performance criteria and report on the outcome of this monitoring on a quarterly basis in a quarterly report. After the implementation of this methodology, the outcome of this monitoring shall be reported in the annual report.
5. CE TSOs shall have developed the intraday AHC, allowing for simultaneous consideration on both intraday-auctions with flow-based allocation and SIDC intraday continuous trade with ATC-based allocation. If not yet implemented in Core CCR, CE TSOs shall propose an implementation deadline subject to readiness of SIDC intraday continuous trade in flow based. Before the implementation of AHC, CE TSOs shall involve the CE NEMOs to test the implementation of AHC within the SIDC and market participants to adapt to the effects of applying AHC. This phase shall last at least three (3) months. CE TSOs shall publish an analysis that allows market participants to understand the impact of AHC. CE TSOs and iTCP shall analyse measures to increase cross-zonal capacities in the intraday timeframe according to article 26.
6. CE TSOs and iTCP shall aim to reach, over time, a minimum capacity threshold of 70%
7. The operationalisation of the SEM – France bidding zone border within the CE CCR is dependent on the commercial readiness of the HVDC cable connecting the two bidding zones and the technical conditions allow operations to begin. The integration of the HVDC cable connecting the two bidding zones into the present capacity calculation methodology shall be conducted in compliance with the provisions of Article 13(5).

## **TITLE 8 - Final provisions**

### **Article 28. Language**

1. The reference language for this methodology shall be English. For the avoidance of doubt, where TSOs need to translate this methodology into their national language(s), in the event of

inconsistencies between the English version published by TSOs in accordance with Article 9(14) of the CACM Regulation and any version in another language, the relevant TSO shall, in accordance with national legislation, provide the relevant CE and iTCP regulatory authorities with an updated translation of the methodology.

## Annex 1: Justification of usage and methodology for calculation of allocation constraints

Allocation constraints may be used by the following CE TSOs:

- 1: Poland - PSE
- 2: SEM – EirGrid and SONI
- 3: TERNA

The following section depicts in detail the justification of usage and methodology currently used by each CE TSO to design and implement allocation constraints, if applicable. The legal interpretation on eligibility of using allocation constraints and the description of their contribution to the objectives of the CACM Regulation is included in the Explanatory Note.

### 1. Poland

PSE may use allocation constraints to limit the import and export of the Polish bidding zone.

#### Technical and legal justification

Implementation of allocation constraints as applied by PSE is related to integrated scheduling process applied in Poland (also called central dispatching model) and the way how reserve capacity is being procured by PSE. In a central dispatching model, in order to balance generation and demand and ensure secure energy delivery, the TSO dispatches generating units taking into account their operational constraints, transmission constraints and reserve capacity requirements. This is realised in an integrated scheduling process as a single optimisation problem called security constrained unit commitment (SCUC) and economic dispatch (SCED).

The integrated scheduling process starts after the day-ahead capacity calculation and SDAC and continues until real-time. This means that reserve capacity is not blocked by TSO in advance and in effect not removed from the wholesale market and SIDC. However, if balancing service providers (generating units) would already sold too much energy in the previous market timeframes because of high exports, they may not be able to provide sufficient upward reserve capacity within the integrated scheduling process<sup>5</sup>. Therefore, one way to ensure sufficient reserve capacity within integrated scheduling process is to set a limit to how much electricity can be imported or exported in the SIDC.

The objective to limit balancing service providers to sell too much energy in the intraday market in order to be able to provide sufficient reserve capacity in the integrated scheduling process cannot be efficiently met by translating this limit into capacities of critical network elements offered to the market. If this limit was to be reflected in cross-zonal capacities offered by PSE in the form of an appropriate adjustment of cross-zonal capacities, this would imply that PSE would need to guess the most likely market direction (imports and/or exports on particular interconnectors) and accordingly reduce the cross-zonal capacities in these directions. In the flow-based approach, this would need to be done on each CNEC in a form of reductions of the RAM. However, from the point of view of market participants, due to the inherent uncertainties of market results, such an approach is burdened with the risk of suboptimal splitting of allocation constraints onto individual interconnections – overestimated on one interconnection and underestimated on the other, or vice versa. Also, such reductions of the RAM would limit cross-zonal exchanges for all bidding zone borders having impact on Polish CNECs,

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<sup>5</sup> This conclusion equally applies for the case of lack of downward balancing capacity, which would be endangered if balancing service providers (generating units) sell too little energy in the day-ahead market, because of too high imports.

whereas the allocation constraint has an impact only on the import or export of the Polish bidding zone, whereas the trading of other bidding zones is unaffected.

Allocation constraints are determined for the whole Polish power system, meaning that they are applicable simultaneously for all CCRs in which PSE has at least one bidding zone border (i.e. CE, Baltic and Hansa). This solution is the most efficient application of external constraints. Considering allocation constraints separately in each CCR would require PSE to split global external constraints into CCR-related sub-values, which would be less efficient than maintaining the global value. Moreover, in the hours when Poland is unable to absorb any more power from outside due to violated minimal downward reserve capacity requirements, or when Poland is unable to export any more power due to insufficient upward reserve capacity requirements, Polish transmission infrastructure is still available for cross-border trading between other bidding zones and between different CCRs.

### Methodology to calculate the value of allocation constraints:

When determining the allocation constraints, PSE takes into account the most recent information on the technical characteristics of generation units, forecasted power system load as well as minimum reserve margins required in the whole Polish power system to ensure secure operation and forward import/export contracts that need to be respected from previous capacity allocation time frames.

Allocation constraints are bidirectional, with independent values for each ID CC MTU, and separately for directions of import to Poland and export from Poland.

For each hour, the constraints are calculated according to the below equations:

$$EXPORT_{constraint} = P_{CD} - P_{NA} + P_{NCD} - (P_L + P_{UPres})$$

$$IMPORT_{constraint} = P_L - P_{DOWNres} - P_{CDmin} - P_{NCD} \quad (2)$$

Where:

$P_{CD}$	Sum of operating generating capacities of centrally dispatched units as declared by generators <sup>6</sup>
$P_{CDmin}$	Sum of technical minima of centrally dispatched generating units in operation
$P_{NCD}$	Sum of schedules of generating units that are not centrally dispatched, as provided by generators (for wind farms: forecasted by PSE)
$P_{NA}$	Generation not available due to grid constraints (both planned outage and/or anticipated congestions)
$P_L$	Demand forecasted by PSE
$P_{UPres}$	Minimum reserve for upward regulation
$P_{DOWNres}$	Minimum reserve for downward regulation

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<sup>6</sup> Note that generating units which are kept out of the market on the basis of strategic reserve contracts with the TSO are not taken into account in this calculation.

For illustrative purposes, the process of practical determination of allocation constraints in the framework of the intraday capacity calculation is illustrated below in Figures 1 and 2. The figures illustrate how a forecast of the Polish power balance for each hour of the delivery day is developed by PSE in the morning of D-1 in order to determine reserves in generating capacities available for potential exports and imports, respectively, for the intraday market.

Allocation constraint in export direction is applicable if  $\Delta\text{Export}$  is lower than the sum of cross-zonal capacities on all Polish interconnections in export direction. External constraint in import direction is applicable if  $\Delta\text{Import}$  is lower than the sum of cross-zonal capacities on all Polish interconnections in import direction.

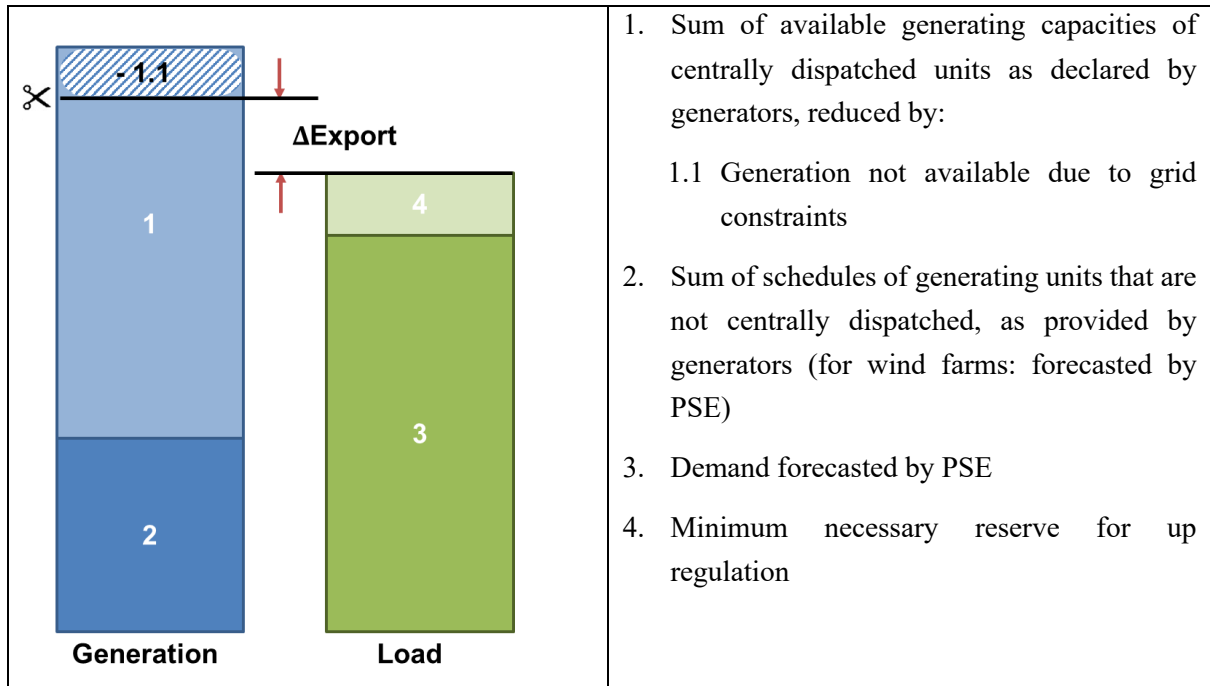


Figure 1: Determination of allocation constraints in export direction (generating capacities available for potential exports) in the framework of the intraday capacity calculation.

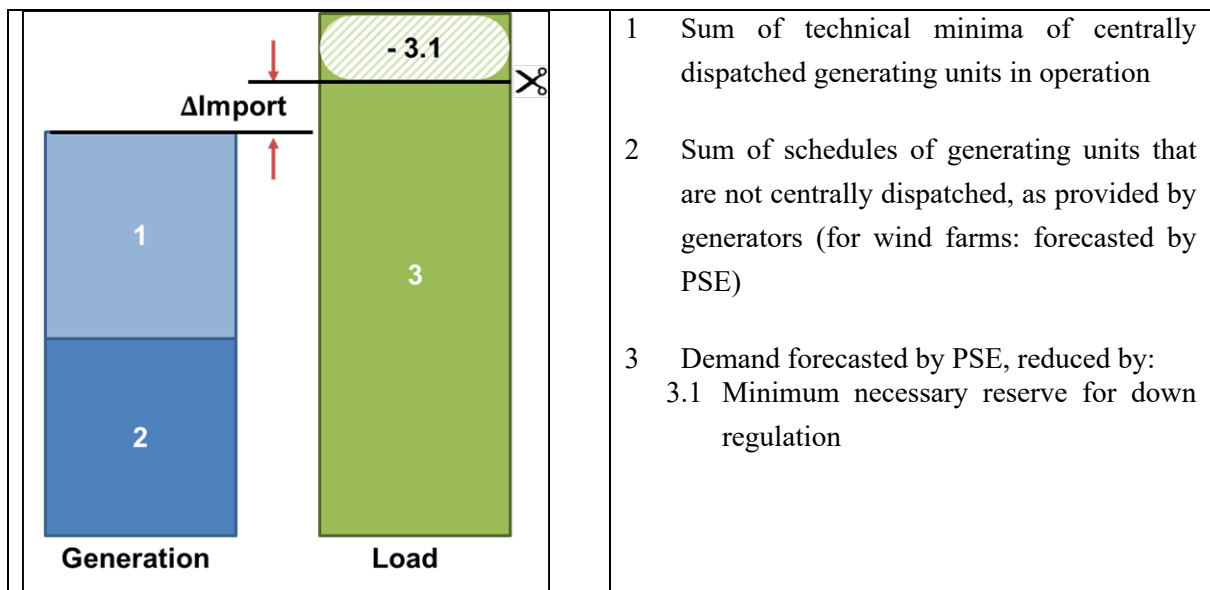


Figure 2: Determination of allocation constraints in import direction (reserves in generating capacities available for potential imports) in the framework of intraday capacity calculation.

### **Frequency of re-assessment**

Allocation constraints are determined in a continuous process based on the most recent information, for each capacity allocation time frame, from forward till day-ahead and intraday. In case of intraday process, these are calculated for each intraday capacity calculation timeframe in accordance with Article 4(2), resulting in independent values for each TU, and separately for directions of import to Poland and export from Poland.

### **Time periods for which allocation constraints are applied**

As described above, allocation constraints are determined in a continuous process for each capacity allocation timeframe, so they are applicable for all TUs of the respective allocation day.

## 2. SEM

### **Technical and legal justification**

EirGrid and SONI intend to implement both allocation constraints on the net position of the SEM bidding zone and ramping constraints on the Celtic interconnector (HVDC) in compliance with Article 7 of CE Intraday Capacity Calculation Methodology (CCM).

#### **i) Reasons EirGrid and SONI propose using allocation constraints**

The primary objective of allocation constraints is to maintain operational security standards while enabling efficient market functioning. The necessity of these constraints for the SEM bidding zone is driven by several factors. As the island of Ireland operates a relatively small power system and electricity market which constitutes a separate synchronous area, dispatching decisions by EirGrid and SONI (SEM TSOs) need to carefully consider system security and real-time balance of supply and demand.

The SEM TSOs are responsible for generation commitment and determining optimal dispatch schedules. In centralized dispatch, balancing reserve procurement and congestion management are performed concurrently, in an integrated process. This differs from self-dispatch systems, where the balance-responsible parties make commitment decisions and determine dispatch positions, based on their own economic criteria, the technical constraints of generating units and the demand elements they are responsible for balancing.

The electricity system of the island of Ireland features a high penetration of renewable energy sources, particularly wind, with the instantaneous System Non-Synchronous Penetration (SNSP) levels reaching up to the safe operational limit of 75%. In the island of Ireland, renewables accounted for 40.0% of the country's electricity generation over the year 2024, with wind energy providing 33% of total electricity demand. Moreover, 41% of the months in the year 2024 had a SNSP of 50% or higher. The large share of wind and solar introduces volatility and unpredictability into the grid, requiring system operators to balance with dispatchable generation and Battery Energy Storage Systems (BESS).

During periods of extremely low wind generation, there can be limited operational flexibility, and managing domestic system reserves becomes crucial to prevent the system from entering an alert, emergency, or blackout state. During these periods of tight system margins, limiting the total export capacity of the SEM bidding zone becomes a key remedial action. This prevents potential market-driven export flows from causing a deficit in reserve margins, thereby ensuring system generation resource adequacy and avoiding potential violations of operational security limits.

In certain situations, conventional generating units identified through system studies are required to operate to support system voltage and provide reactive power in specific parts of the grid, as well as to maintain system inertia above recommended thresholds for frequency stability. These units are treated as priority dispatch (must-run), and system operators may aim to keep them online at or above their minimum generating capability ( $P_{min}$ ). Additionally, during periods of heavy rainfall, run-of-river hydro units are also prioritized to manage water levels and mitigate the risk of upstream flooding. These operational requirements may reduce the system's flexibility to lower domestic generation. To preserve adequate downward regulation capability and avoid over-supply, it may become necessary to limit the total import capacity into the SEM bidding zone. This remedial action ensures must-run units can operate as required while maintaining system balance and protecting operational security limits.

The island of Ireland operates within a synchronous area that comprises the control areas of both Ireland and Northern Ireland. This synchronous area is connected to other synchronous zones exclusively via HVDC subsea cables. While these HVDC links provide essential cross-zonal trading capacity, they offer limited synchronous support and cannot deliver services such as inertia or electromagnetic coupling. The extent of support services available from HVDC links depends on both the technical capabilities and the commercial agreements between interconnector owners and TSOs. Moreover, the relatively small size of the synchronous area restricts the ability to share reserves and balancing capacity across bidding zone borders, placing it at a disadvantage compared to larger systems like Continental Europe. These limitations may necessitate additional measures to ensure sufficient domestic operating reserves are maintained under all operating conditions.

High HVDC import levels can reduce the dispatch of local synchronous generation, which in turn lowers system inertia and increases susceptibility to frequency deviations during disturbances such as interconnector trips or local faults. The sudden loss of an HVDC interconnector also poses transient stability risks, potentially leading to significant power imbalances and rotor angle instability. Moreover, large HVDC power flows can affect local oscillatory modes, raising small-signal stability concerns in a low-inertia environment where damping is limited. When combined with the variability of intermittent renewable sources, these dynamic stability challenges may require operational management, including measures in the form of allocation constraints to safeguard system security.

ii) **Reasons EirGrid and SONI propose using ramping constraints on Celtic interconnector**

With the commissioning of the Celtic interconnector (700 MW), it will become the largest infeed and outfeed for the all-island system, increasing the total cross-zonal trading capacity of SEM bidding zone to 2200 MW, which accounts for nearly 30% of peak system demand. To maintain system stability, particularly during imbalances caused by flow changes on HVDC interconnections between market time units (TUs), ramping restrictions are necessary. These restrictions further mitigate the risk of abrupt shifts between (maximum) import and export limits across two TUs. Thereby, ramping constraints, as a specific type of allocation constraints, ensure that the maximum flow change on the HVDC interconnector between TUs remains within secure operational limits.

**Methodology of calculating allocation constraints**

The methodology outlined here shows how the export and import constraints of the net position of the SEM bidding zone are calculated by evaluating the available generation, demand, and reserve requirements. It considers total dispatchable generation, forecasted wind & solar power, and operational limitations such as energy-limited resources like pumped storage, demand side units (DSU), dynamic stability, and battery energy storage. The process also accounts for reductions due to long-notice plants (long lead-time), generation unavailable because of grid constraints, and unusable hydro capacity.

The difference between net generation and the sum of demand and operating reserves for upward regulation defines the net position constraint in the export direction. On the other hand, the system demand subtracted from the sum of technical minima of dispatchable generation (required to run to maintain system inertia), non-dispatchable generation, and operating reserves for downward regulation

defines the net position constraint in the import direction. Adopting the equations from Annex 1 for continuity and clarity, the Export and Import constraints are defined as follows:

$$\begin{aligned} \mathbf{Export}_{Constraint} &= P_{CD} - P_{UG} - (P_{DER} + P_{NCD}) - (P_L + P_{UPres}) \\ \mathbf{Import}_{Constraint} &= P_L - P_{DOWNres} - P_{CDmin} - P_{NCD} \end{aligned}$$

Where:

$P_{CD}$  : Sum of operating generating capacities of centrally dispatched units as declared on fuel availability by generators

$P_{CDmin}$  : Sum of technical minima of centrally dispatched generating units in operation

$P_{UG}$  : Unavailable generation due to Transmission Constraints, Long-Notice Units, Unusable Hydro

$P_{DER}$  : Derated generation (Demand Response Units, Pumped Storage, Battery Energy Storage Systems)

$P_{NCD}$ : Sum of schedules of generating units that are not centrally dispatched, as provided by generators

$P_L$ : Forecasted Load

$P_{UPres}$  : Minimum reserve for upward regulation

$P_{DOWNres}$  : Minimum reserve for downward regulation

### **Frequency of recalculation**

Allocation constraints are determined through a continuous process for each capacity allocation time frame, based on the most recent information on the technical offer data of dispatchable generating units, forecasted wind and solar generation, forecasted system demand, and operational limitations such as dynamic stability and system constraints.

### **Time periods for which allocation constraints are applied**

In the case of the day-ahead process, allocation constraints are calculated on the morning of D-1, resulting in bi-directional values (import and export) for each DA CC TU of the respective trading day. However, actual capacity restrictions are applied only to those TUs where the calculation results indicate a potential violation of system security limits.

## 3. TERNA

TERNA may use allocation constraints to limit the import from the Northern Italian interconnectors.

### **Technical and legal justification**

**Allocation constraints** are defined by the Italian TSO and shared with the other TSOs and CCC as a maximum value of acceptable import from the whole Northern Italian Interconnection. Capacity allocation constraints are a legally prescribed means, defined by CACM Regulation (Art. 23(3) and art. 21(1)(a)(ii) CACM).

Allocation constraints are used by Terna to take into account operational security constraints related to margins, voltage control and dynamic system stability within the Italian grid, in particular during low demand/high renewable infeed periods.

These three kinds of constraints are needed to maintain the transmission system within secure operations, but cannot be translated efficiently in form of maximum flows on critical network elements. Hence the constraints above shall be expressed via allocation constraints in the market coupling algorithms.

If this constraint was implemented as a reduction in the cross-zonal capacities, it would mean that TERNA would have to guess the most probable direction of the market (imports and/or exports on particular interconnectors) and consequently estimate the reductions on the different interconnectors. In the flow based approach, this would mean estimating the RAM reduction on each CNEC, with the consequent risk of not distributing the constraint, in an optimal way, on the individual interconnections, overestimating the constraint on one interconnection and underestimating it on the other, or vice versa.

On the other hand, the use of allocation constraints ensures that the market decides how to allocate capacity in the most efficient way among the different Northern Italian Interconnections, considering that the allocation constraint is provided to the market as a constraint limiting the import at the Northern Italian Border.

The scope of Allocation Constraint is to make the Italian TSO able to activate the needed set of power plants, applying redispatching actions at national level.

The minimum set of dispatchable power plants to be activated in order to provide system services according to the criteria of System Operation Guidelines (e.g. voltage regulation, primary reserve...), is quantified performing steady-state security analysis and dynamic assessments on several scenarios considered representative of the expected system conditions

**Ramping constraints** (known also as ‘flow ramping limits’) are used for limiting the maximum variation of import/export from/to a set of interconnectors from one MTU to the next. Due to the peculiar structure of the Italian network as a long peninsula AC-meshed with the European bulk system only on the northern borders, large variations of exchange programs between one MTU and the next may endanger the grid security during real time operations leading to challenging management of the voltage and frequency profiles. In fact, the transient variations induced by the exchange control program may require such a relevant reserve margin that could lead to technical unfeasibility both in terms of active and reactive power.

Furthermore, the growing trend of production from renewable sources makes the issue even more critical due to the uncertainty of the actual production from renewable sources.

### **Methodology to calculate the value of allocation constraints**

The allocation constraint, defined as the maximum value of acceptable import from the Northern Italian interconnectors, is computed according to the following formula: Where:

$$Import_{max}^h = [L^h - DR^h] - [ND^h + VRI^h] + P^h$$

Where:

*L*: hourly load forecast

*DR*: downward reserve defined according to the uncertainties related to load and RES forecasts

*ND*: infeed expected from non-dispatchable power plants

*VRI*: is the infeed from the minimum set of dispatchable power plants

*P: available pumping capacity*

When determining the allocation constraints, TERNA considers the most recent information on the technical characteristics of generation units, forecasted power system load as well as downward reserve defined according to the uncertainties related to load and RES forecasts. The available pumping capacity helps mitigate the effect of allocation constraint.

Allocation constraints are determined in the evening of D-2 for all the MTUs concerning both the DA and Intra-Day processes.

In order to take into account the allocation constraints, pursuant to Article (7)(2)(c) in case of SIDC fallback procedure, at the end of the calculation, the ATC for AT->IT, SI->IT and FR->IT borders shall be minor or equal to the Allocation constraints split among AT->IT, SI->IT and FR->IT borders, respectively:

$$Final\ ATC_{AT \rightarrow IT} = \min (AC_{AT \rightarrow IT} ; ATC_{k,AT \rightarrow IT})$$

$$Final\ ATC_{SI \rightarrow IT} = \min (AC_{SI \rightarrow IT} ; ATC_{k,SI \rightarrow IT})$$

$$Final\ ATC_{FR \rightarrow IT} = \min (AC_{FR \rightarrow IT} ; ATC_{k,FR \rightarrow IT})$$

The AC values (for AT->IT, SI->IT, FR->IT borders) are calculated splitting the allocation constraint per border, based on the splitting factors calculated by using the values (Article (24)(5)(vii)).

$$AC_{x \rightarrow IT} = AC * SF_{x \rightarrow IT}; \quad \text{where } x \text{ in } (FR, AT, SI)$$

$$SF_{x \rightarrow IT} = ATC_{k,x \rightarrow IT} / \sum_{x=1}^3 ATC_{k,x \rightarrow IT}$$

The ramping constraint is defined as the maximum value of variation of exchange (import/export) from/to a set of interconnectors from one MTU to the next from the Northern Italian interconnectors:

$$|Exchange_{max}^{MTU} - Exchange_{max}^{MTU-1}| \leq Ramping$$

Ramping constraints are determined for all the MTUs concerning both the DA and Intra-Day markets.

In establishing ramping constraints, TERNA adopts a statistical approach based on historical generation data declared by power plants enabled to provide ancillary services, taking into account technical feasibility with respect to both active and reactive power, as well as renewable energy source (RES) forecasts.

Terna sets ramping limits using the maximum MW/min gradient. The ramping value is then calculated using a specific formula:

$$Ramping = Gradient * time\ ramp$$

With:

Gradient: maximum gradient  $\left[ \frac{MW}{min} \right]$

time ramp: [min]

An update regarding the parameters values may be provided no later than the timelines referred to in Article 7.4(b).

In order to take into account the ramping constraints, pursuant to Article (7)(2)(d) in case of SDAC fallback procedure, at the end of the calculation, ATCs shall be summed up and limited considering the maximum variation of the calculated ATCs between consecutive MTUs as described below.

For import direction, the Final ATC for AT->IT, SI->IT and FR->IT borders computed after the application of allocation constraint shall be used.

The ramping constraint is applied on the total ATC defined as:

$$ATC_{(FR,AT,SI) \rightarrow IT,AC} = \sum_{x=1}^3 Final\ ATC_{x \rightarrow IT}$$

where  $x$  in (FR,AT,SI)

The result after applying the ramping constraint is  $ATC_{(FR,AT,SI) \rightarrow IT,AC,AfterRamping}$  and it is split for each border.

$$ATC_{Final,x \rightarrow IT,AC} = ATC_{(FR,AT,SI) \rightarrow IT,AC,AfterRamping} * Coef_{x \rightarrow IT}$$

where:

$$Coef_{x \rightarrow IT} = \frac{Final\ ATC_{x \rightarrow IT}}{ATC_{(FR,AT,SI) \rightarrow IT,AC}}$$

For the export direction, the ATC for IT->AT, IT->SI and IT->FR borders computed by the SDAC fallback procedure in Article (24) shall be used.

The ramping constraint is applied on the total ATC defined as:

$$ATC_{IT \rightarrow (FR,AT,SI)} = \sum_{x=1}^3 ATC_{IT \rightarrow x}$$

where  $x$  in (FR,AT,SI)

The result after applying the ramping constraint is  $ATC_{IT \rightarrow (FR,AT,SI),AfterRamping}$  and it is split for each border.

$$ATC_{Final,IT \rightarrow x} = ATC_{IT \rightarrow (FR,AT,SI),AfterRamping} * Coef_{IT \rightarrow x}$$

where:

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$$Coef_{IT \rightarrow x} = \frac{ATC_{IT \rightarrow x}}{ATC_{IT \rightarrow (FR, AT, SI)}}$$

