
TSOs proposal for the methodology for Coordinated
Redispatching and Countertrading in accordance with
Article 35(1) of Commission Regulation (EU) 2015/1222
of 24 July 2015 establishing a guideline on capacity
allocation and congestion management

Xxx December 2017

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All Transmission System Operators of the Channel Capacity Calculation Region taking into account the following,

Whereas

- (1) Commission Regulation (EU) 2015/1222 establishes a guideline on capacity allocation and congestion management (hereinafter referred to as the “CACM Regulation”), which entered into force on 14 August 2015.
- (2) This document, including its annexes, is a common proposal developed by all Transmission System Operators (hereafter referred to as “TSOs”) of the Channel Capacity Calculation Region as defined in accordance with Article 15 of CACM Regulation (hereafter referred to as “Channel Region”) regarding the proposal for the methodology for Coordinated Redispatching and Countertrading (hereafter referred to as “RD and CT Methodology”) in accordance with the CACM Regulation. This proposal is required by Article 35(1) of the CACM Regulation. The RD and CT Methodology was consulted from xx December 2017 until xx January 2018 in accordance with Article 12 of CACM Regulation.
- (3) The TSOs of the Channel Region (hereafter referred to as “Channel TSOs”) aim at ensuring consistency with Coordinated Redispatching and Countertrading methodologies of other Capacity Calculation Regions in which same bidding zones are concerned whilst acknowledging the specific characteristics of the interconnectors within the Channel Region.
- (4) This proposal takes into account the TSOs' proposal for a day-ahead and intraday capacity calculation methodology (hereinafter referred to as the “Channel DA and ID CC Methodology”) in accordance with Article 20 of the CACM Regulation and submitted to the NRAs of the Channel Region for approval on 15 September 2017.
- (5) In the context of this proposal, the definition of ‘Channel RSCs’ as defined in the Article 2 of this RD and CT Methodology is important and has the meaning of the Regional Security Coordinator as defined into the Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation (hereinafter referred to as the “SO GL Regulation”).
- (6) The bidding zone borders in the Channel Region are made up of HVDC interconnectors between two different Synchronous Areas. Redispatching and Countertrading in the Channel Region is performed by changing the flow over the HVDC interconnector (i.e. by changing the infeed or offtake at the connection point of the interconnector) in order to change the flow pattern and relieve physical congestions. The location effect for Countertrading and Redispatching over an HVDC interconnector in the Channel Region (i.e. change in infeed or offtake at the HVDC connection points) is identical. As a consequence there is no difference between Countertrading and Redispatching in the Channel Region.
- (7) Changing the flow over an HVDC interconnector in the Channel Region for Redispatching and Countertrading purposes results in an imbalanced situation in the

control areas to which the interconnector is connected (since the HVDC interconnector is between two different Synchronous Areas). Therefore bids must be activated at both ends of the HVDC interconnector in order to restore the balance (locally or cross-border). By doing so the TSOs need nevertheless to consider local physical congestion issues for selecting the bids.

- (8) This RD and CT Methodology contributes to and does not in any way hinder the achievement of the objectives of Article 3 of the CACM Regulation. In particular this RD and CT Methodology:
- a. Establishes a common and coordinated process for the Redispatching and Countertrading by defining a set of harmonised rules for congestion management and as such serves the objective of promoting effective competition in the generation, trading and supply of electricity in accordance with Article 3(a) of the CACM Regulation;
 - b. Contributes to the objective of ensuring optimal use of the transmission infrastructure in accordance with Article 3 (b) of the CACM Regulation by using last available inputs based on the best possible forecast of transmission systems and market results at the time of each security analysis, updated in a timely manner, for the detection of Coordinated Redispatching and Countertrading needs.
 - c. Contributes to the objective of ensuring operational security in accordance with Article 3 (c) of the CACM Regulation by coordinating the Coordinated Redispatching and Countertrading at regional level to ensure its reliability;
 - d. Contributes to the objective of optimising the calculation and allocation of cross-zonal capacity in accordance with Article 3 (d) of the CACM Regulation by integrating the timings of the Coordinated Redispatching and Countertrading process into the timings of the different Capacity Calculation process steps.
- (9) The scope of the RD and CT Methodology is limited to relieve physical congestions by means of a cross zonal exchange initiated by system operators between two bidding zones.

SUBMIT THE FOLLOWING PROPOSAL TO ALL NATIONAL REGULATORY AUTHORITIES OF THE CHANNEL REGION:

TITLE 1

General Provisions

Article 1

Subject matter

1. This RD and CT Methodology is the common proposal of all TSOs of the Channel Region in accordance with Article 35 of the CACM Regulation.

Article 2

Definitions and interpretation

1. For the purposes of the RD and CT Methodology, the terms used shall have the meaning given to them in:
 - a. Article 2 of Regulation (EC) 714/2009 on conditions for access to the network for cross-border exchanges in electricity and repealing Regulation (EC) 1228/2003;
 - b. Article 2 of Regulation (EC) 543/2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council (hereinafter referred to as the “Transparency Regulation”);
 - c. Article 2 of the CACM Regulation; and
 - d. Article 3 of SO GL Regulation.
2. In addition, the following definitions shall apply:
 - a. ‘Requesting TSO’ means the Channel TSO responsible for the real time operation of their control area and directly involved in Coordinated Redispatching or Countertrading processes and who requests the Coordinated Redispatching or Countertrading process to relieve physical congestion in its control area;
 - b. ‘Assisting TSO’ means the Channel TSO responsible for the real time operation of their control area and participates with the Requesting TSO in Coordinated Redispatching or Countertrading;
 - c. ‘Facilitating TSO’ means the Channel TSO(s) responsible for the real time operation of the interconnector(s) linking the control area of the Requesting TSO and the control area of the Assisting TSO and on which the flow is to be modified as a result of Countertrading;
 - d. ‘Participating TSOs’ means the Requesting TSO, the Assisting TSO and the Facilitating TSO;
 - e. Interconnector Countertrading and Redispatching Time Unit’ (ICRTU) means the minimum duration of a Countertrading Period. The ICRTU value is determined by the TSO(s) operating the interconnector on the basis of technical and market

constraints and following consultation with the TSO(s) responsible for the real time operation of the control areas connected by the interconnector;

- f. 'Nomination Platform' means the relevant system(s) used by Participating TSOs to manage the nominations on an interconnector asset of a Facilitating TSO;
 - g. 'Interconnector Countertrading Deadline' means the deadline for instructing the interconnector with the Countertrading. This deadline is interconnector dependent, determined by the TSO(s) operating the interconnector following consultation with the TSO(s) responsible for the real time operation of the control areas connected by the interconnector and represents the time before the effective delivery of energy on the interconnector, needed to transform the aggregated commercial and Countertrading nominations into interconnector reference program;
 - h. 'RSC Coordination Deadline' means the latest moment in time when the Channel RSCs are able to perform the coordination for Countertrading and the operational security assessment. After this deadline the coordination process could be done between Channel TSOs without the participation of Channel RSCs. This deadline depends of the methodology for the preparation of remedial actions managed in a coordinate way in accordance with Article 76(1)(b) of SO GL Regulation;
 - i. 'Countertrading Period' means the period of time during which Countertrading is activated. The duration of the period must be an entire multiple of the ICRTU;
 - j. 'RD and CT Actions' means the measures initiated by the Requesting TSO and Assisting TSO in order to compensate the change of physical flow on the interconnector resulting from the Countertrading process and restore the balance in their respective control area; and
 - k. 'Channel RSCs' means the Regional Security Coordinators operating in the Channel Region.
3. In this RD and CT Methodology, the following acronyms are used:
- a. 'AAC' means 'Already Allocated Capacity';
 - b. 'CCC' means the 'Coordinated Capacity Calculator';
 - c. 'CNTC' means 'Coordinated Net Transmission Capacity';
 - d. 'SDAC' means the 'Single Day-Ahead Coupling';
 - e. 'SIDC' means the 'Single Intraday Coupling';
 - f. 'IGM' means the 'Individual Grid Model'; and
 - g. 'CCR' means the 'Capacity Calculation Region'.
4. In this RD and CT Methodology, unless the context requires otherwise:
- a. the singular indicates the plural and vice versa;
 - b. headings are inserted for convenience only and do not affect the interpretation of this RD and CT Methodology; and

- c. any reference to legislation, regulations, directives, orders, instruments, codes or any other enactment shall include any modification, extension or re-enactment of it when in force.

Article 3 Scope

1. The scope of this RD and CT Methodology is limited to the Coordinated Redispatching and Countertrading within the Channel Region in accordance with Article 35 of CACM Regulation.
2. Coordinated Redispatching and Countertrading in the Channel Region consist of the following aspects:
 - a. volume information and availability exchange and price information exchange;
 - b. detection;
 - c. coordination;
 - d. activation of Countertrading;
 - e. total cost calculation;
 - f. reporting; and
 - g. cost sharing & settlement

The cost sharing & settlement aspect as set out in point (g) above is detailed in the separated methodology in accordance with Article 74 of CACM Regulation.

3. In order to implement this RD and CT Methodology, border-specific Coordinated Redispatching and Countertrading operational procedures (hereafter referred to as "RD and CT Procedures") will be established during the implementation phase between relevant TSOs of each bidding zone border in the Channel Region.
4. The Channel RSCs of the Channel Region must apply the common provisions for regional operational security coordination in accordance with the Article 76 of SO GL Regulation.

TITLE 2

Coordinated Redispatching

Article 4

General principles for Redispatching

1. All bidding zone borders of the Channel Region consist of HVDC interconnectors between Great Britain (GB) and Continental Europe Synchronous Areas. Redispatching or Countertrading on Channel Region bidding zone borders are implemented by means of change of the physical flow over the interconnector assets owned by the Facilitating TSO, which results in a change in offtake or injection at the connection point of the interconnectors. This has as a consequence that:
 - a. in case of a change of interconnector physical flow, an imbalance occurs in both the control areas of the Requesting and Assisting TSOs. This imbalance is to be resolved by RD and CT Actions to restore the balance;
 - b. the RD and CT Action initiated by the Requesting TSO has no impact on the flows in the control area of the Assisting TSOs and vice versa;
 - c. volumes of Countertrading or Redispatching refer to the volumes of RD and CT Actions activated by the Requesting TSO and the Assisting TSO;
 - d. costs of Countertrading or Redispatching refer to the directly related costs incurred by the Requesting TSO and the Assisting TSO for the RD and CT Actions activation and the directly related costs incurred by Facilitating TSOs for changing the flow over the interconnector; and
 - e. all Countertrading and Redispatching referred to in this RD and CT Methodology is cross-border relevant.

Therefore no difference can be made between Coordinated Redispatching and Countertrading in the Channel Region.

TITLE 3

Coordinated Countertrading process

Article 5

General principles for Countertrading

1. Countertrading is coordinated, between the TSOs of the Channel Region in accordance with Article 10 and Article 11. In this RD and CT Methodology, this coordination is reinforced by the role played by the Channel RSCs in the Countertrading, in accordance with Article 76 of the SO GL Regulation.
2. Redispatching and Countertrading are remedial actions that may be proposed by the RSC following the criteria defined in the Article 21 of SO GL Regulation.
3. The Channel RSCs shall assess the impact of Redispatching and Countertrading on the control areas of the TSOs, in accordance with Article 76 of SO GL Regulation.
4. The Requesting TSO shall, upon request by the Assisting TSO, provide the justification of the need for applying Countertrading.
5. The Requesting TSO can only perform Coordinated Countertrading and Redispatching remedial actions over interconnectors connected to its own control area.

Article 6

Timeframes for Countertrading

1. The Countertrading process can be initiated by a Requesting TSO after the results of SDAC or, when applicable, regional fall back solutions in accordance with Article 44 of the CACM Regulation.
2. Countertrading shall be instructed to the Facilitating TSO before the Interconnector Countertrading Deadline specified in the annex.
3. Four different timeframes should be considered for Countertrading, :
 - a. Period 1 is considered in case of Countertrading activation between the start time mentioned in Article 6(1) and the deadline for the “*Input Data Gathering*” phase of the Intraday Capacity Calculation of the Intraday Capacity Calculation;
 - b. Period 2 is considered in case of Countertrading activation between the “*Input Data Gathering*” and the “*Validation*” phase of the Intraday Capacity Calculation;
 - c. Period 3 is considered in case of Countertrading activation after the “*Validation*” phase of the Intraday Capacity Calculation and before the RSC Coordination Deadline; and
 - d. Period 4 is considered in case of Countertrading activation after the RSC Coordination Deadline and before the Interconnector Countertrading Deadline.

Article 7

Volume information availability and exchange

1. Each of the Channel TSOs who have their control area linked by one or several interconnector(s) within the Channel Region will inform each other on indicative and non-firm volumes available for Countertrading, in each direction, after the publication of the results of the SDAC. This exchange of information will also be made available to the Channel RSCs.
2. The exchanged information on volumes shall take into account any legal obligation of each TSO regarding the Reserve Capacity and ensuring to stay within the operational security limits.
3. The exact timing for exchanging the volumes for each border is described in the border specific RD and CT Procedures.
4. This shared volume is not binding and is a best endeavours estimate of the available volume that could be available for Countertrading to solve physical congestion only.
5. Requesting and Assisting TSOs shall inform each other how the volume is calculated and updated.
6. Volume information exchange procedure is border-specific and will be described bilaterally between the two relevant Requesting and Assisting TSOs in the RD and CT Procedure.
7. Facilitating TSOs shall inform the relevant TSOs as soon as reasonably practicable of any unavailability of the interconnector asset (planned or unplanned) for the Countertrading process.

Article 8

Price information exchange

1. Each of the Channel TSOs who have their control area linked by one or several interconnector(s) within the Channel Region will communicate to each other indicative estimation of prices associated to the volumes available for Countertrading, after the publication of the results of the SDAC. This exchange of information will also be made available to the Channel RSCs.
2. In accordance with Article 35(5) of CACM Regulation, prices of the volumes available for Countertrading shall be based either on:
 - a. prices in the relevant electricity markets for the relevant time-frame; or
 - b. the cost of resources available for the Countertrading action at that moment in time.
3. The price information exchange procedure is border-specific and will be described bilaterally between the two relevant Requesting and Assisting TSOs in the RD and CT Procedure.

Article 9 Detection

1. The Countertrading process can be initiated in one of the timeframes defined in Article 6 of this RD and CT Methodology after the detection of a physical congestion in the control area of a Channel TSO.
2. The physical congestion can be detected by either a Channel TSO or a Channel RSC on its behalf. The Channel TSO who operates the control area where the physical congestion is detected will be considered the Requesting TSO for the purposes of this RD and CT Methodology.
3. In each case where physical congestion is detected, all involved parties at this stage must contact and provide each other with all the information needed to have a common view on the physical congestion to be solved.
4. The Channel RSCs may, according to Article 78 of SO GL Regulation, recommend to the relevant Channel TSO effective and economically efficient remedial actions to solve the identified physical congestion, based on the available price and volume information. This recommendation for remedial actions shall be accompanied by explanations as to its rationale.
5. In case of several interconnectors on the same border, the selection of one or several interconnectors to countertrade will be done by the Channel RSCs, or the Requesting and Assisting TSOs during Period 4, based on the location of the physical congestion, operational security and economic efficiency (i.e. losses).
6. In case of two Countertrading requests with overlapping Countertrading Period between two Participating TSOs, the RSC should analyse and advice on the volume and the direction of the Countertrading. The final decision will always be taken jointly by the Requesting and the Assisting TSO.
7. In accordance with Article 78 of SO GL Regulation, the relevant Channel TSOs shall jointly decide whether to initiate the recommended remedial action. In the case where the recommended remedial action is a Countertrading on a border of the Channel Region, the coordination process will be initiated in accordance with Article 10 of this RD and CT Methodology. Where the relevant TSO decides not to initiate the recommended remedial action, an explanation for this decision shall be provided to the Channel RSCs.

Article 10 Coordination

1. The coordination process will be initiated by the Requesting TSO or by the Channel RSCs where the Channel RSCs have originally detected the constraint.
2. The Requesting TSO will provide the Assisting TSO, the Facilitating TSO(s) and the Channel RSCs with the Countertrading characteristics based on the information collected during the detection phase.
3. Countertrading characteristics should at least contain the following elements:

- a. The interconnector identification(s);
 - b. The direction of the Countertrading;
 - c. The Countertrading Period;
 - d. The estimated needed Countertrading volume information for the Countertrading Period, based on the current market situation.
4. The Assisting TSO must confirm the feasibility of the required Countertrading for the duration of the Countertrading Period.
 5. The Channel RSCs shall perform, if needed, a new security assessment to analyse the impact of the Countertrading on all Channel TSOs in function of the last agreed Countertrading volume between Participating TSO.
 6. Any significant impact detected by a Channel RSC on other Channel TSO's control area must be communicated to all impacted Channel TSOs and followed-up by the Channel RSCs who shall collect the feedback from those Channel TSOs and share them with the Participating TSOs.
 7. If a Channel RSC detects a significant impact on the flows of another Channel TSO's control area, these Channel TSOs will be consulted in the decision described in the Article 10(8). In the case where this impact will create a physical congestion in its control area, this Channel TSO will be considered as Assisting TSO in the decision described in the Article 10(8) and 10(9) of this RD and CT Methodology.
 8. If the Participating TSOs confirm the feasibility of the Countertrading, the Requesting TSO and the Assisting TSO shall jointly decide to effectively perform the Countertrading, taking into account the analysis from the Channel RSCs, the grid situations of each Participating TSO's control area and the potential interconnector(s) constraints.
 9. The Participating TSO which rejects the request must provide a justification to the other Participating TSOs.

Article 11

Fast coordination

1. If a need for Countertrading is only detected during Period 4, then the detection and coordination processes described in Articles 9 and 10 of the RD and CT Methodology could be exceptionally limited to the Participating TSOs without the Channel RSCs, with the aim to solve the physical congestion at the basis of said request.
2. If the Participating TSOs detect a risk of significant impact on the control area of other Channel TSOs, they will be contacted by the Requesting TSO to be part of the fast coordination process.

Article 12

Activation of Countertrading

1. The Countertrading volume and period will be matched between the Requesting and Assisting TSO.
2. The exact matching process and the reference point for the Countertrading Nomination is border-dependant and is described in the RD and CT Procedures.
3. During the Period 1, the Participating TSOs will:
 - a. ensure that the Nomination Platform is instructed with the Countertrading; and
 - b. update their IGM. Those IGM will serve as input for the intraday capacity calculation.
4. During the Period 2, the Participating TSOs will:
 - a. ensure that the Nomination Platform is instructed with the Countertrading;
 - b. update their IGM, if relevant;
 - c. if applicable, reject the NTC value proposed by the Channel DA and ID CC Methodology and provide a justification to CCC; and propose a new NTC value that solves the physical congestion.
5. During the Period 3 and 4, the Participating TSO will:
 - a. reduce NTC of interconnector in the case where SIDC is still open for the concerned Countertrading Period;
 - b. ensure that the Nomination Platform is instructed with the Countertrading; and
 - c. update their IGM, if relevant.
6. The Participating TSOs responsible for the actions in Article 12(3), 12(4) and 12(5) will be defined in the relevant RD and CT Procedures.
7. The Countertrading volume will be netted with the existing market nominations on the Nomination Platform.
8. The relevant TSO systems will be notified by the Nomination Platform with updated data.
9. The selection of the RD and CT Actions in each control area is the responsibility of each Requesting and Assisting TSO, based on local operational security and local economic efficiency. These RD and CT Actions may be composed of activation of available generation units and loads in accordance with the appropriate mechanisms, relevant markets and agreements applicable to its control area. As long as these local RD and CT Actions compensate the effect of the Countertrading in each control area, while ensuring the local operational security, they shall be firstly used.
10. If local RD and CT Actions are not sufficient, in accordance with Article 35(3) of CACM Regulation, Channel TSOs can also activate cross-border exchange of energy on other interconnector, in accordance with the appropriate mechanisms or agreements applicable to its borders and/or to the other CCRs to which this TSO belongs.

11. The selection process of the RD and CT Actions in each control area should be described in a transparent way in the relevant RD and CT Procedures.

Article 13

Total cost calculation

1. In accordance with Article 35 (5) of CACM Regulation, the total cost of Countertrading will be determined transparently by summing the costs/incomes of Participating TSOs involved in Countertrading.
2. The costs and incomes considered for Countertrading and Redispatching are:
 - a. Charges for RD & CT Actions, incurred by the Requesting and Assisting TSOs;
 - b. Charges related to the change of flow for Countertrading and Redispatching purposes, incurred by the Facilitating TSO.

Article 14

Reporting

1. All Countertrading actions will be reported as described in the Transparency Regulation and in the Commission Regulation (EC) 1227/2011 for Energy Market Integrity and Transparency.

TITLE 4

Miscellaneous

Article 15

Publication

1. The TSOs shall publish the RD and CT Methodology without undue delay after all national regulatory authorities have approved the RD and CT Methodology in accordance with Article 9 of the CACM Regulation.

Article 16

Confidentiality of information

1. All data will be considered as confidential records and treated as such, unless publication is required by an applicable reporting obligation. It is understood that the information and data handled during the RDCT process is sensitive, and should on this basis be treated as confidential. As a result all information gathered, analysis performed and other data available to the involved Parties are deemed confidential and will only be available for the TSOs members in the restricted part of the common tool and platform, unless required to be published by some applicable reporting obligation.
2. The parties will prepare ad hoc confidentiality agreements. The corresponding data and information shall be managed and labelled by the TSOs members in accordance with this policy and procedure to ensure its protection.

Article 17

Cancellation of Countertrading nominations

1. In the case of curtailment of commercial nominations, the Facilitating TSO will first cancel, if relevant and in coordination with the Participating TSOs, the existing Countertrading nominations before curtailing the commercial nominations.
2. In the case of a capacity shortage (such as an unplanned outage) where the Facilitating TSO is unable to physically flow the requested energy volume due to a technical issue then the Facilitating TSO will first cancel, if relevant and in coordination with the Participating TSOs, the existing Countertrading nominations before taking the needed actions to mitigate this technical issue while assuring the firmness of other existing commercial nominations.
3. In the case of unplanned outage or unexpected change of the forecasted production or load pattern in the control area of the Requesting TSO or Assisting where the Requesting TSO or Participating TSO is unable to provide the planned RD and CT Actions needed to compensate the Countertrading, Participating TSOs could jointly decide to cancel a part or the totality of the existing Countertrading nominations.

Article 18 Implementation

1. The implementation of this RD and CT Methodology is subject to:
 - a. Regulatory approval of this RD and CT in accordance with Article 9 of the CACM Regulation;
 - b. Regulatory approval of Redispatching and Countertrading Cost Sharing Methodology required by Article 74 of the CACM Regulation in accordance with Article 9 of the CACM Regulation;
 - c. Regulatory approval of Common Coordinated Capacity Calculation Methodology required by Article 20 of the CACM Regulation in accordance with Article 9 of the CACM Regulation; and
 - d. Development and implementation of the systems required to support the RD and CT Methodology.
2. Due to the dependencies described above, this RD and CT Methodology will be implemented no later than 12 months after the approval of this methodology.
3. Channel TSOs will, if possible, endeavour to implement this RD and CT Methodology as soon as possible before the 26 months after the regulatory approval of capacity calculation region, in order to develop the report assessing the progressive coordination and harmonisation of coordinated Redispatching and Countertrading mechanisms and agreements and including proposals required by Article 35(3) of the CACM Regulation.

Article 19 Language

1. The reference language for this common capacity calculation Proposal shall be English. For the avoidance of doubt, where TSOs need to translate this RD and CT 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 TSOs shall be obliged to dispel any inconsistencies by providing a revised translation of this RD and CT Methodology to their relevant national regulatory authorities.

Annex

| Border | FR-GB | NL-GB | BE-GB |
|---|----------------------------|----------------------------|----------------------------|
| ICRTU | 60 minutes | 60 minutes | 15 minutes |
| Interconnector Countertrading Deadline | 60 minutes before delivery | 60 minutes before delivery | 30 minutes before delivery |

N.B The 60 minute and 30 minute deadline is still subject to discussions and agreement within the Channel region.