# Consultation report for the Channel CC Methodology proposal

September 15<sup>th</sup>, 2017

#### Disclaimer

This assessment of stakeholders' comments is submitted by all TSOs of the Channel Region to all NRAs of the Channel Region for information and clarification purposes only accompanying the proposal for common capacity calculation methodology for the day-ahead and intraday market timeframe in accordance with Article 20 of Commission Regulation (EU) 2015/1222 of 24 July 2015.

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### **1** Assessment of stakeholders' comments

The TSOs of the Channel Region have elaborated, in accordance with Article 20 of Commission Regulation (EU) 2015/1222 of 24 July 2015a common capacity calculation methodology proposal for the day-ahead and intraday market timeframe. This proposal was publically consulted between 23 June and 31 July 2017 in accordance with Article 12 of CACM Regulation. Responses from 7 parties were received and duly considered by the Channel CCR TSOs when finalizing the Channel CC Methodology proposal.

This section provides an overview of the most important consultation responses, the Channel CCR TSOs' assessment of these responses and, where relevant, resulting changes to the Channel CC Methodology proposal performed by the TSOs of the Channel Region. The full list of comments received can be found in the Annex attached to this document.

# **1.1** General consultation responses related to the Channel CC Methodology proposal

Following general consultation responses were received for the Channel CC Methodology Proposal:

1. A general comment was received welcoming the Channel CC Methodology proposal, but requiring more precision on the definition of parameters and harmonization of these parameters across TSOs. In addition a comment was raised that it would be beneficial to include an impact assessment for the choice of the different parameters revealing the impact of the choices made.

The TSOs of the Channel Region have modified the Channel CC Methodology proposal in order to ensure, where possible, more harmonization of the parameters across TSOs. For GSKs, FRMs, cross-zonal sensitivity thresholds and operational security limits, the TSOs of the Channel Region also being active in the Core Region will follow the principles as decided upon in the Core Region. Where possible GB will also follow this or provide clear justification on the reason for differences.

The TSOs of the Channel Region would like to highlight that, given challenging timelines for developing and submitting the Channel CC Methodology, it was not possible to perform an impact analysis for those parameters (since the methodology is not implemented yet). Nevertheless the TSOs of the Channel Region included, where possible, procedures to re-assess parameters on regular basis and to check consistency with other Regions.

2. Conflicting stakeholder views were received regarding the 'Advanced Hybrid Coupling' (AHC) concept. Some respondents provided feedback that an AHC approach should not be implemented (as congestions inside the Core region shouldn't be managed by limiting trade in the Channel Region), whereas other respondents welcomed the advancement of Channel TSOs to proceed to implementation of AHC since it could unlock welfare gains.

The TSOs of the Channel Region therefore keep the proposed approach of performing a detailed study on the AHC approach, subject to stakeholder consultation and NRAs validation.

3. A general consultation response was received, stating that the proposed Channel CC Methodology does not detail how power flow capabilities of critical network elements are efficiently shared among different borders (in accordance with Article 21(1)(b)(vi) of the CACM Regulation.

The TSOs of the Channel Region would like to highlight that Channel CC Methodology is based on a fully coordinated NTC approach and ensures an efficient sharing of power flow capabilities over the different borders.

First of all it is important to note that, in absence of planned or unplanned outages, the Channel CC Methodology foresees that the full MPTC is provided for day-ahead allocation. Furthermore the Channel CC Methodology and explanatory note explain in detail how, where applicable, a reduction on interconnectors is determined in an efficient way, by taking into account the sensitivity of the exchanges over the interconnector on the limiting critical network element. An example was added in the explanatory note. Furthermore a full breakdown of a critical network element was included in the explanatory note providing further information on the flows over critical network elements.

4. One of the respondents suggested introducing a regionally coordinated compensation to Interconnector TSOs in the Channel CC Methodology in case of reduction of unallocated capacity on the interconnector.

As highlighted in the Channel CC Methodology, the TSOs of the Channel Region consider the topic of any compensation<sup>1</sup> that would be payable to an interconnector in the event that its capacity is restricted to be out of scope of the Channel CC Methodology.

5. A general feedback was provided towards all Capacity Calculation Regions that capacity calculation proposals based on a CNTC approach should include a justification that the using a flow-based approach would not yet be more efficient compared to the proposed CNTC approach assuming the same level of operational security. One of the respondents welcomed the justification provided in the explanatory note to the Channel CC Methodology.

## *In response to this request, the TSOs of the Channel Region included a new article in the Channel CC Methodology proposal, justifying the application of the CNTC approach.*

- 6. Several respondents indicated that TSOs must publish transmission infrastructure unavailability affecting cross-zonal capacities and communicate the impact on the cross-zonal capacities. The respondents recognize that, in the context of coordinated capacity calculation, it might be difficult to forecast the impact of such events a few days in advance and therefore consider that TSOs should provide full transparency on
  - the capacity calculation methodology; and
  - the critical parameters determining the cross-zonal exchange capacity in practice.

The respondents also require that

- outages of CNEs should be published in a timely and usable manner on the ENTSO-E transparency platform;
- capacity should be published as soon as validated so that market parties can take updated values into account; and
- Level of commitment towards "qualitative" transparency to be formalized in binding documents (seasonal changes of FMAX, SPAIC,...)

The TSOs of the Channel Region welcome the request of market parties for more transparency. The TSOs of the Channel Region have included a new article on publication of information in the Channel CC Methodology. The TSOs would welcome an open dialogue with market parties in order to discuss the published information with respect to the Channel CC Methodology.

The TSOs of the Channel Region confirm that they will publish outages of CNEs in a timely and usable manner on the ENTSO-E Transparency Platform. Furthermore they will publish cross-zonal capacities as soon as validated by the TSOs, thereby highlighting that cross-zonal capacities for DA allocation only become firm after the day-ahead firmness deadline and that ID cross-zonal capacity is firm once allocated.

The TSOs of the Channel Region would welcome an open dialogue with market parties in order to define requirements for qualitative transparency for the Channel CC Methodology. They would like to emphasize that the SPAIC approach was specifically elaborated for the CWE FB mechanism, and are willing to discuss with market parties how such approach could be translated to the Channel CC Methodology which is based on a CNTC approach (taking into account the specific needs of market parties).

<sup>&</sup>lt;sup>1</sup> Any compensation arrangement will be discussed on a national basis with the relevant regulatory authority.

#### **1.2** Consultation responses per Article

#### Article 1: Subject matter and scope

No comments received related to this article.

#### Article 2: Definitions and interpretation

1. Several respondents indicated that an unavailability of the interconnector asset itself should be included as a planned or unplanned outage that might potentially trigger a more detailed capacity calculation for the day-ahead timeframe.

The TSOs of the Channel Region would like to highlight that reduced availability of the interconnector is taken into account in the maximum permanent technical capacity (MPTC) and therefore clarified the definition of the MPTC as follows:

"MPTC means, for the relevant market time unit(s), the maximum permanent technical capacity which is the maximum continuous active power which a cross-zonal network element (interconnector/HVDC system) is capable of transmitting (taking into account potential reduced availability due to planned and unplanned outages of the interconnector asset). This parameter is defined by the interconnector's asset operators, and only considers the interconnector asset availability."

#### Article 3: Application of the proposal

No comments received related to this article.

#### Article 4: Justification of capacity calculation approach [NEW]

New article added after public consultation.

#### Article 5: General principles for cross-zonal capacities for DA market

1. Several respondents highlighted the need for more transparency on (or criteria for defining) the outages which are considered under "planned and unplanned outages with significant impact on the interconnector..." in article 5(1)(b) of the Channel CC Methodology. The respondents also highlighted that these should only be grid elements in the vicinity of the interconnector.

The Channel CCR TSOs have performed following changes in order to provide more transparency on the considered outages:

- The Channel CC Methodology now requires the Channel TSOs to publish and maintain an indicative list of planned and unplanned outages in the vicinity of the HVDC interconnector that may trigger a day-ahead capacity calculation; and
- The annex of the explanatory note provides a first version of such list for the different TSOs.

The list is non-exhaustive since it focuses on single outages (N-1). The TSOs of the Channel Region would like to highlight that more rare events (e.g. double outages further away in the grid) can also have a significant impact on the interconnector and can therefore also trigger a detailed day-ahead calculation. In any case each TSOs is bound by the Channel CC Methodology to provide full transparency on the conditions that have led to performing a more detailed day-ahead capacity calculation by providing a public ex-post explanation.

Finally the TSOs of the Channel Region would like to highlight that the notion of "significant impact" implies that the grid elements are in the vicinity of the interconnector connection point (as can be seen from the indicative list).

2. One respondent indicated that the flow-reversal risk for overloads for the day-ahead capacity calculation is higher since the forecast of the exchange over the interconnector is performed more in advance (D-2) compared to the intraday timeframe.

The TSOs of the Channel Region agree that indeed the prediction of the flow direction over an interconnector is more difficult in D-2 than in D-1. Nevertheless, as explained in the explanatory document, the magnitude of potential overloads due to flow-reversal in the day-ahead capacity calculation is less due to the inherent properties of the flowbased allocation in the day-ahead timeframe in the CWE or Core region. Furthermore this timeframe leaves more time for TSOs (and also more available means) to take required actions in order to mitigate the (limited) overflows. Therefore the TSOs of the Channel Region consider that the risk of flow-reversal can be efficiently managed for the day-ahead capacity calculation.

#### Article 6: General principles for cross-zonal capacities for ID market

1. Several respondents indicated that the concept of providing full MPTC (unless in case of planned and unplanned outage) should also be applied in the intraday timeframe since they **don't understand why the risk for overloads due to flow reversal is higher in the** intraday timeframe.

As stated in the explanatory note, the TSOs of the Channel Region clarify that the risk of overloads due to flow reversal is significantly higher in intraday timeframe:

- due to the fact that, in absence of flow-based allocation in the ID timeframe, allocations in ID on Channel and CORE regions are completely independent (in contrast to the day-ahead allocation where a change of flow over the interconnector is modelled as a change of net position in the flow-based allocation), which results in higher potential overloads in case of flow-reversal over the interconnectors in intraday; and
- due to the fact that in ID, the capacity can be used by the market up to 1h before real time, leaving less time and less margins (resources) for TSOs to combine and implement efficient remedial actions compared to the DA situation. So, even if the list of remedial actions is the same, the capacity to cover the risk of overloads resulting from flow reversal is lower in ID compared to DA.

Hence the combination of higher magnitude of potential overloads due to flow reversal in ID, availability of less resources to resolve such overloads and reduced time to act makes that the TSOs of the Channel Region cannot apply the day-ahead approach for intraday.

Furthermore the TSOs of the Channel Region would like to highlight nevertheless that the Already Allocated Capacity (AAC) is guaranteed as a minimum capacity for the intraday timeframe.

2. Several respondents highlighted the need for a justification of the proposed number of intraday capacity calculations to be included in the Channel CC Methodology.

At this time the TSOs of the Channel Region have no view on the technical feasibility of performing more than one intraday capacity calculation as of go-live (e.g. the only available process providing an accurate intraday common grid model is the Day-Ahead Congestion Forecast (DACF), allowing for one ID reassessment only), nor have any (historical) data available to quantify benefits or costs of increasing the number of intraday capacity calculations, since the methodology is new and not implemented yet. The TSOs of the Channel Region will therefore start with performing a single intraday capacity calculation.

In order to address the consultation responses, the TSOs of the Channel Region have now included in the Channel CC Methodology that they will perform, no later than two years after the implementation of the Channel CC Methodology, a study on the optimal number of intraday computations, considering different aspects (socio-economic benefits and technical feasibility, security of supply,...).

#### Article 7: Critical Network Element and Contingency (CNEC) methodology

1. Several respondents indicated that a generic threshold on the basis of cross-zonal efficiency should be justified on the basis of economic efficiency. Other parties indicated that in case such threshold is applied, TSOs should demonstrate how they will ensure that no undue discrimination takes place between internal and cross-zonal exchanges. Finally one party highlighted that, regardless of selection criteria, the Channel CC Methodology allowed the TSOs of the Channel Region to include CNECs not respecting the threshold (or exclude CNECs that do respect the threshold).

The Channel TSOs would like to highlight that the Channel methodology ensures that the non-discrimination between internal and cross-zonal flows is ensured by providing the MPTC to the market in the day-ahead timeframe. Only in case of a specific planned or unplanned outage with significant impact on the interconnector (or flow reversal risk in day-ahead, there may be assessment whether the capacity on the interconnectors must be reduced for operational security reasons.

Furthermore the TSOs of the Channel Region that are also active in the Core Region will implement, once approved, the CNEC selection principles of the Core Region also in

the Channel Region. For the moment the CNEC selection principles in the Core Region are investigated, and more in particular the need of providing a minimum margin on internal lines.

Finally the TSOs of the Channel Region would like to highlight that there is no direct relationship between the selection of a CNEC and a potential reduction in capacity (e.g. remedial actions are also available to resolve potential congestions on CNECs).

Furthermore the TSOs of the Channel Region decided to remove the option of including CNECs with a cross-zonal sensitivity below the threshold in the capacity calculation in exceptional cases. The option of excluding CNECs that respect the sensitivity threshold was kept.

2. Several respondents suggested that CNECs can only those elements for which a planned or unplanned outage is considered having a significant impact on the interconnector.

The TSOs of the Channel Region disagree with this reasoning for following reasons:

- In the day-ahead timeframe the full MPTC is provided for the day-ahead timeframe. A more detailed DA capacity calculation is only launched in case of a planned or unplanned outage with significant impact on the interconnector, which might trigger a capacity reduction according to the rules described in the Channel CC Methodology;
- It is important to note that, in case of a planned or unplanned outage with significant impact on the interconnector, the impact of exchanges over the interconnector on other grid elements than those considered for "planned and unplanned outages with significant impact...", is potentially more significant (since the grid is not complete at that stage). Therefore the TSOs of the Channel Region cannot agree with the suggestion provided by the respondents.
- 3. Feedback was provided that internal constraints should not be considered at first stage of the capacity calculation methodology, unless economically more efficient or required for operational security point of view.

The TSOs of the Channel Region would like to highlight that, in case no planned or unplanned outages with significant impact on the interconnector are present, the full MPTC is provided to the market in the day-ahead timeframe. A more detailed DA capacity calculation can only be triggered in case of such outages and is required for operational security reasons (since the grid is not complete at that stage).

4. One respondent considers that, if PTDF thresholds are to be considered for the selection of CNEs, those should be set at a higher level for critical outages, when the related constraints can be addressed curatively with the available costly remedial actions.

The Channel CCR TSOs would like to explain that in such situation the applicable CNE could be excluded by a TSO (i.e. TSOs can exclude CNEs respecting the threshold). It is very difficult to translate this in mathematical selection criteria, the more since the selection or not of such CNEs would also depend a.o. from the availability of said curative RA.

5. One respondent stated that the values for the cross-zonal sensitivity threshold are not defined in the proposal itself.

The Channel CC Methodology contains detailed values for CNEC selection principles. Nevertheless, in order to ensure harmonized principles across CCRs, the TSOs of the Channel Region being also active in Core Region commit to implement the Core CNEC selection principles once defined and approved by NRAs. The Core CCR CNEC selection principles are for the time being discussed and developed (considering cross-zonal sensitivity thresholds of 5% or more and, in addition, the potential application of minimum margins on internal lines).

6. One respondent indicated that it was unclear why different cross-zonal exchange thresholds were defined for the day-ahead and intraday timeframe. Another question was received why thresholds can be potentially different between GB and continental TSOs of the Channel Region

The TSOs of the Channel Region would like to stress that the sensitivity thresholds proposed in the Channel CC Methodology are the same for the day-ahead and intraday timeframes. However since the TSOs of the Channel Region strive for harmonization with other CCRs, they did not exclude at this point in time that different values could be defined in the future.

The TSOs of the Channel Region ensured that the GB CNEC selection criteria are consistent with those of the IU Region, and that, in the future, the criteria for TSOs of

the Channel Region also active in the Core Region will correspond to the criteria defined in the Core Region.

Differences between GB and continental Europe might be required since system characteristics and system operation principles and needs are very different. However the default criterion of 5% included in the Channel CC Methodology ensures at least in the initial stage for a harmonized principle in the Channel Region.

#### Article 8: Reliability margin methodology

1. One respondent required the FRM threshold to be presented and duly justified in the capacity calculation methodology in order for market participants to assess its efficiency in terms of welfare optimisation for the whole region.

The TSOs of the Channel Region would like to highlight that the FRM threshold is defined on the basis of operating principles (i.e. coverage of risks of uncertainty).

The Channel CC Methodology states that the TSOs will regularly review the principles for defining reliability margin in order to ensure consistency with other CCRs. Moreover the TSOs of the Channel Region that are also active in the Core Region will apply the principles as defined in the Core Region.

The TSOs of the Channel Region have performed following changes:

- Clarification of the FRM risk thresholds (starting point) for the different TSOs in the explanatory document (i.e. threshold of 90% for Channel TSOs also active in Core and for GB there might be no FRM defined); and
- Requirement that harmonized FRM principles will be applied by the TSOs of the Channel Region also active in the Core Region.
- 2. One respondent stated that FRM values should be recalculated in the intraday timeframe in order to take into account the improvement in terms of visibility on expected flows on CNEs.

The TSOs of the Channel Region would like to highlight that the Channel CC Methodology foresees already in separate DA and ID FRM calculations.

As the FRMs translate the uncertainty between the best forecast used for the computation and the reality, if no new computation is done, there is no reason the change the FRM.

3. One respondent stated that since identified uncertainties concern fundamental parameters such as wind and solar generation forecast, an assessment of the seasonality of FRM values would be valuable. For example, wind or PV power in-feed is subject to seasonality over daily or yearly periods and this feature should be reflected in the FRM values.

The TSOs of the Channel Region decided to perform no changes to the Channel CC Methodology. The uncertainty of renewables infeed is only one of the factors that define the value of the FRM. Hence at this stage it is unclear whether benefits would appear from studying seasonality effects of the FRM.

4. Several respondents called for clarity in all capacity calculation methodologies on whether "controlled" deviations are considered or not in the setting of transmission reliability margins. Also, deviations related to a change in net positions of the bidding zones with respect to the forecasted CGM should be neutralized. When outage rates are considered for the unavailability of some transmission assets, some respondents recommend that it should include only outages that occur after the Long Term Firmness Deadline (i.e. 11h DA). Another respondent indicated that the FRM should only incorporate deviations occurring after the long-term firmness deadline (11h DA) and that TSOs should report systematically on the historical record of deviations for any network element likely to limit cross-zonal trades.

The TSOs of the Channel Region clarify that the Channel CC Methodology foresees that deviations related to shifting of net position to the value of the snapshot and alignment of taps on Power Shift Transfers (PSTs) from snapshot towards the CGM will be incorporated. Furthermore, outage rates are not applicable for the Channel proposal.

The TSOs of the Channel Region would like to highlight that the interpretation that FRM might only consider deviations after the day-ahead firmness deadline (DAFD) is not fully correct; whereas TSOs can indeed change day-ahead cross-zonal capacities and allocation constraints until the DAFD, the FRM considered in the calculation should cover deviations occurring between the calculation and real-time. In other words: it is not possible to re-calculate capacity instantaneously at DAFD to cover for any deviations that occurred just before the DAFD.

The TSOs of the Channel Region would welcome an open discussion with stakeholders on the need for publications of information.

#### Article 9: Methodology for operational security limits

1. One respondent highlighted that CNECs considered both in Core and Channel should be subject to same operational limits.

The TSOs of the Channel Region would like to emphasize that the Channel CC Methodology foresees that relevant parameters (FMAX, FRM,...) for such CNECs are aligned between the Core and Channel CCR.

2. A response was provided that at least seasonal value of the maximum allowable current on all CNEs impacted by seasonal variations should be foreseen.

The TSOs of the Channel Region modified the Channel CC Methodology accordingly and provided that Imax will be defined on at least a seasonal basis. Furthermore the proposal foresees also that dynamic line rating can be applied.

3. A response was provided that as a general rule the applied power factor should be sufficiently high and can only be reduced in case of security issue with appropriate justification.

The TSOs of the Channel Region included more information on the value of the power factor in the explanatory document. For the Channel TSOs also active in the Core Region, the power factor will be set at 1 as defined in the Core Region (unless amended later on in the Core Region).

#### **Article 10: Methodology for External Constraints**

No comments received related to this article.

#### Article 11: Generation shift keys methodology

1. One respondent indicated that it might be more efficient that each TSO chooses the most relevant way to assess the GSK in its control area, provided that the main objective of the selected methodologies is to apply the lowest FRM. Other respondents indicated that such differences should be justified.

The TSOs of the Channel Region have included a justification for the application of different GSK methodologies in the explanatory note.

In order to avoid confusion, RTE, Elia, and Tennet will use the same GSKs as proposed in the Core Region.

2. Several respondents required transparency on GSKs (reporting on GSK setting approach, communicate GSK methodologies to the market...).

The TSOs of the Channel Region would welcome an open discussion with stakeholders on the transparency needs regarding GSKs.

#### Article 12: Methodology for remedial actions in capacity calculation

1. Several respondents indicated that there is a need for a clearly described method for the application non-costly and costly remedial actions in capacity calculation. Several respondents indicated that costly remedial actions should be considered systematically in capacity calculation (as being done in security assessment) where economically efficient.

The TSOs of the Channel Region would like to highlight that the Channel CC Methodology foresees that the submission of non-costly RAs is mandatory, whereas the submission of costly RAs in capacity calculation is optional for each TSO. This is in line with Article 25(5) of CACM Regulation requiring TSOs to consider remedial actions without costs into the capacity calculation process itself. The Channel CC Methodology provides sufficient flexibility for TSOs to include costly remedial actions in the capacity calculation process itself where NRAs would locally agree and/or require doing so.

The Channel day-ahead capacity calculation methodology ensures that in the dayahead timeframe the full MPTC is provided to the market. Only in the specific case of a planned or unplanned outage with significant impact on the interconnector, a more detailed capacity calculation is launched in the day-ahead timeframe, which might potentially lead to a reduction of capacity for operational security reasons.

Hence in absence of a planned or unplanned outage with significant impact on the interconnector, the discussion of whether or not costly remedial actions are to be considered in the capacity calculation process is irrelevant.

In case of the specific situation where a planned or unplanned outage exists with significant impact on the interconnector for the day-ahead timeframe or in general for the ID timeframe, the Channel CC Methodology will consider the provided remedial actions with the aim to maximize the cross-zonal capacity over the interconnectors.

The TSOs of the Channel Region would also like to refer to the assessment of stakeholder comments for Article 7 ("CNEC selection").

#### Article 13: Provision of the inputs for the day-ahead Capacity Calculation No comments received related to this article.

Article 14: Provision of the inputs for the intraday Capacity Calculation No comments received related to this article.

#### Article 15: Day-ahead capacity calculation

No comments received related to this article.

#### Article 16: Intraday capacity calculation

No comments received related to this article.

#### **Article 17: Coordinated NTC process**

No comments received related to this article.

#### Article 18: Implementation of reduction of the import/export

No comments received related to this article.

#### Article 19: Implementation of a shift of import/export

No comments received related to this article.

## Article 20: N-1 security assessment of maximum import/export for the 24 hours of the business day

 A consultation response was received that CACM Regulation required a computation of individual values of cross-border exchange capacities for each market time unit. The foreseen framework in the Channel CC Methodology (computing at least import and export capacity for two market time units, e.g. peak and off-peak hours)) risks limiting the capacity made available to the market for certain hours. If TSOs consider that timing and tooling constraints and their impacts cannot be overcome, they should provide a justifying assessment in the explanatory note.

The TSOs of the Channel Region have clarified the Channel CC Methodology that individual values will be computed for each individual market time unit (i.e. for each hour of the day).

However due to the specific capacity calculation approach (binary approach, iterative process) and the fact that this methodology is new (and not implemented yet), the TSOs of the Channel Region would like to highlight that, during implementation, tooling constraints could appear, in which case they will compute the 24 values based on the maximum possible number of N-1 grid security assessment (and at least for two market time units) for each day.

#### Article 21: Already allocated cross-zonal capacity and Available Transfer Capacity

No comments received related to this article.

#### Article 22: Cross-zonal capacity validation methodology

No comments received related to this article.

#### Article 23 & 24: DA & ID cross-zonal capacity validation methodology

No comments received related to this article.

#### Article 25: Provision of allocation constraints to the NEMOs

 A respondent indicated that the allocation constraints mentioned in article 24 of the proposal, and in particular ramping limitations should not be taken into account implicitly through an adjustment on the final capacity values made available to the market but they should be explicitly factored in when solving the capacity allocation problem. The respondent judged that second approach as being more efficient under an economic point of view since it does not oblige TSOs to make assumptions on the direction of flows over the interconnectors resulting from energy markets.

The TSOs of the Channel Region would like to emphasize that Article 21(1)(a)(ii) of CACM Regulation requires that the allocation constraints are included in the capacity calculation process. These allocation constraints (ramping and losses) have indeed no impact on the calculated capacity and only act as a constraint during the allocation

process itself. This in contrast to the external constraints as referred to in Article 10 of the Channel CC Methodology, which act as constraints for the calculated capacity itself.

#### Article 26: Fall-back procedures for day-ahead and intraday timeframes

No comments received related to this article.

#### Article 27: Publication of information [NEW]

New article added after public consultation.

#### Article 28: Publication and Implementation of the Channel CC methodology Proposal

1. One respondent highlighted the importance of quick development of IT specifications and processes for implementation phase.

The TSOs of the Channel Region acknowledge the importance of the quick IT developments.

#### Article 29: Implementation of new interconnectors [NEW]

New article added after public consultation to clarify the implementation of new interconnectors in the methodology.

#### Article 30: Language

No comments received related to this article.

## **ANNEX 1** Channel DA ID CCM Public Consultation Comments