



**REQUEST FOR AMENDMENT (RfA)
BY ALL RELEVANT REGULATORY AUTHORITIES OF
THE HANSA CAPACITY CALCULATION REGION**

ON

**THE PROPOSAL BY ALL RELEVANT TRANSMISSION
SYSTEM OPERATORS OF THE HANSA CAPACITY
CALCULATION REGION TO AMEND
THE FALLBACK METHODOLOGY FOR
THE DAY AHEAD TIMEFRAME IN ACCORDANCE WITH
ARTICLE 44 OF COMMISSION REGULATION (EU)
2015/1222 OF 24 JULY 2015 ESTABLISHING A
GUIDELINE ON CAPACITY ALLOCATION AND
CONGESTION MANAGEMENT**

16 DECEMBER 2025

I. Introduction and legal context

This document elaborates an agreement of 16 December 2025 by the German NRA, Bundesnetzagentur (“BNetzA”); the Dutch NRA, Autoriteit Consument & Markt (“ACM”); the Danish NRA, Danish Utility Regulator (“DUR”); the Swedish NRA, Energimarknadsinspektionen (“Ei”); the Polish NRA, Urząd Regulacji Energetyki (“URE”); and the Norwegian NRA, Reguleringsmyndigheten for energi (“RME”) [hereafter “Hansa NRAs”] to request the German TSOs, TenneT TSO GmbH, 50Hertz Transmission GmbH, and Baltic Cable AB; the Dutch TSO, TenneT TSO NL B.V.; the Danish TSO, Energinet; the Swedish TSO, Svenska kraftnät; the Polish TSO, Polskie Sieci Elektroenergetyczne S.A; and the Norwegian TSO, Statnett [hereafter “Hansa TSOs”], to amend the proposal for a fallback methodology in the day-ahead timeframe for Capacity Calculation Region Hansa [hereafter “CCR Hansa”].

Article 44 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management, cf. the latest consolidated version of 15 March 2021 (hereafter “CACM Regulation”) requires that no later than sixteen months after entry into force of the CACM Regulation, all TSOs of a CCR shall develop a proposal for robust and timely fallback procedures (hereafter: “fallback procedures”) to ensure efficient, transparent and non-discriminatory capacity allocation in the event that the single day-ahead coupling process is unable to produce results.

On December 14, 2017, the proposal for the fallback procedures was approved by the relevant Hansa NRAs. These fallback procedures were amended by the Hansa TSOs and approved by the relevant Hansa NRAs on August 30, 2022, and are now the applicable fallback procedures.

A draft proposal was consulted by the Hansa TSOs through ENTSO-E from 15 May until 15 June 2025 in accordance with Article 12 of the CACM Regulation.

The Hansa TSOs’ proposal - dated 30 June 2025 - was received by the last Hansa NRA on 03 July 2025. Following Article 9(7)(e) and Article 9(10) of the CACM Regulation, the relevant NRAs shall make a decision on any amendments to this methodology, and they have six months from the receipt of the proposal to make a decision. On 16 December 2025, the Hansa NRAs reached an agreement to request an amendment of the Hansa TSOs’ proposal.

This agreement of the Hansa NRAs shall provide evidence that a decision on the proposal does not need to be adopted by ACER pursuant to Article 9(11) of the CACM Regulation. Therefore, this agreement is intended to constitute the basis on which the Hansa NRAs will each subsequently request amendments on the Hansa TSOs’ proposal for CCR Hansa.

The provisions, which constitute the legal basis for the proposal and Hansa NRAs’ agreement on a RfA, can be found in Articles 3, 8, 9, 12, and 44, of the CACM Regulation.

II. The Hansa TSOs’ proposal

The proposal amends the current fallback procedures according to Article 9(13) and 44 of the CACM Regulation.

The fallback procedure is implemented in situations where no results are achieved in the uniform day-ahead market coupling (e.g., due to IT problems). The fallback procedure currently stipulates that in such cases, instead of the implicit allocation of transmission capacities, an explicit allocation in the form of so-called shadow auctions takes place.

The Hansa TSOs now propose to dispense these shadow auctions, which have been little used in the past and have not functioned properly in terms of price formation. Instead, the Hansa TSOs propose that “(i)n the event that the single day-ahead coupling process is unable to produce results for at least one bidding zone border within CCR Hansa, the cross-border capacities to be allocated in the day ahead market time-frame shall be set to zero and the available capacities shall be released for the intraday market time-frame on the concerned bidding zone border(s).”

III. Agreed Hansa NRAs’ position

The Hansa NRAs cannot approve Hansa TSOs’ amendments of the Fallback procedures for the reasons detailed in section IV below. Thus, Hansa NRAs request Hansa TSOs to amend the proposal and to incorporate the following requests of NRAs pursuant to Article 9(12) of the CACM Regulation.

IV. Requests for amendments of the proposal

Article 3.2:

Firstly, the proposal lacks clarity which segment of the intraday market (continuous trading or intraday auctions) the capacity should be allocated. Hence, the Hansa NRAs request the Hansa TSOs to clarify the proposed methodology in this regard.

Secondly, the proposal lacks precise information on when the capacity is to be released (for the intraday timeframe). Therefore, the Hansa NRAs ask the Hansa TSOs to include this information in the methodology.

Thirdly, the Hansa NRAs ask the Hansa TSOs to clarify that in the event of a decoupling situation, the fallback procedures will apply only to the decoupled bidding zone border(s).

Justification of the procedure

In accordance with Article 44 of the CACM Regulation the Hansa TSO shall develop “a proposal for robust and timely fallback procedures to ensure *efficient, transparent and non-discriminatory* capacity allocation in the event that the single day-ahead coupling process is unable to produce results.” Based on these objectives, the Hansa TSOs must justify in the explanatory document the choice of timeframes and the segment of the intraday market where capacity shall be allocated. In addition, the Hansa TSOs shall explain more in detail how the proposed fallback procedure works in practice in the explanatory document (e.g. how the capacities are released to the ID market and market participants). Furthermore, the Hansa TSOs should specify in the explanatory document when the fallback procedure will be implemented for the bidding zone border SE4-DE/LU.

V. Conclusion

Hansa NRAs have assessed, consulted, closely cooperated and coordinated to reach the agreement that Hansa NRAs cannot approve the Hansa TSOs' amendments, cf. Article 44 of the CACM Regulation.

Pursuant to Article 9(12) of the CACM Regulation, Hansa NRAs hereby request Hansa TSOs to amend the Fallback procedures proposal, which shall take into account the comments stated above and shall be submitted by Hansa TSOs no later than two months after receiving the request for amendment.

In addition, Hansa NRAs request Hansa TSOs to submit an amended proposal in two versions,
- a version, showing track-changes in respect of the specific requests for amendments, and
- a "clean" version, not showing track-changes in respect of the specific requests for amendments.

Hansa NRAs have agreed to inform their respective TSOs on the request for amendment of Hansa TSOs' proposal on the basis of this agreement by 03 January 2026.