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Bonn
16.12.2025

Genehmigung der gemeinsamen Kapazitätsberechnungsmethode für den Day-Ahead- und den Intraday-Zeitbereich der Übertragungsnetzbetreiber der Kapazitätsberechnungsregion Hansa gemäß Artt. 20 ff. CACM-VO

In dem Verwaltungsverfahren

gegenüber der

50Hertz Transmission GmbH, Heidestraße 2, 10557 Berlin, gesetzlich vertreten durch die Geschäftsführung

– Antragstellerin zu 1 –

Baltic Cable AB, Gustav Adolfs Torg 47, SE-2119 Malmö, Schweden, vertreten durch den Vorstand

– Antragstellerin zu 2 –

TenneT TSO GmbH, Bernecker Straße 70, 95448 Bayreuth, gesetzlich vertreten durch die Geschäftsführung

– Antragstellerin zu 3 –

wegen

Bundesnetzagentur für
Elektrizität, Gas, Telekommunikation,
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Genehmigung der gemeinsamen Kapazitätsberechnungsmethode für den Day-Ahead- und den Intraday-Zeitbereich der Übertragungsnetzbetreiber der Kapazitätsberechnungsregion Hansa gemäß Artt. 20 ff. der Verordnung (EU) 2015/1222 zur Festlegung einer Leitlinie für die Kapazitätsvergabe und das Engpassmanagement

hat die Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen, Tulpenfeld 4, 53113 Bonn, gesetzlich vertreten durch ihren Präsidenten Klaus Müller, am 16. Dezember 2025 entschieden

1. In Abänderung der Bescheide der Bundesnetzagentur vom 19. Mai 2021 (Az. 622-21-004) und vom 3. Mai 2022 (Az. 622-22-002) wird die gemeinsame Kapazitätsberechnungsmethode für den Day-Ahead- und den Intraday-Zeitbereich der Übertragungsnetzbetreiber der Kapazitätsberechnungsregion Hansa gemäß Artt. 20 ff. der Verordnung (EU) 2015/1222 zur Festlegung einer Leitlinie für die Kapazitätsvergabe und das Engpassmanagement wie in Anlage I dieses Bescheides niedergelegt genehmigt.
2. Eine Kostenentscheidung bleibt vorbehalten.

Gründe

A.

I. Verfahrensgegenstand und Verfahrensablauf

Das vorliegende Verwaltungsverfahren betrifft die Genehmigung der Kapazitätsberechnungsmethode für den Day-Ahead- und den Intraday-Zeitbereich der Kapazitätsberechnungsregion („CCR¹“) Hansa der Übertragungsnetzbetreiber („ÜNB“) dieser Region gemäß Artt. 20 ff. der Verordnung (EU) 2015/1222 zur Festlegung einer Leitlinie für die Kapazitätsvergabe und das Engpassmanagement in der Fassung der Durchführungsverordnung (EU) 2021/280 vom 22. Februar 2021 („CACM-VO“).

Das Ziel der CACM-VO besteht in der Koordination und Harmonisierung der Kapazitätsberechnung und -vergabe in den grenzüberschreitenden Day-Ahead und Intraday-Märkten. Um dieses Ziel zu erreichen, regelt die CACM-VO u.a., dass alle ÜNB der betreffenden CCR einen Antrag für eine gemeinsame Kapazitätsberechnungsmethode für den Day-Ahead- und den Intraday-Zeitbereich erarbeiten und den jeweiligen Regulierungsbehörden zur Genehmigung vorlegen, siehe Art. 20 Abs. 2 CACM-VO. Die gemeinsame Kapazitätsberechnung soll sicherstellen, dass dem Markt optimale Kapazität zur Verfügung gestellt wird, siehe Erwägungsgrund 6 CACM-VO.

¹ CCR: Capacity Calculation Region (Kapazitätsberechnungsregion).

Die CCR Hansa wurde durch Entscheidung 06/2016 der Agentur der Europäischen Union für die Zusammenarbeit der Energieregulierungsbehörden („ACER“) vom 17. November 2016 determiniert und sukzessive um weitere Gebotszonengrenzen erweitert. Sie umfasst heute die Gebotszonengrenzen

Dänemark 1-Deutschland/Luxemburg („DK1-DE/LU“), bewirtschaftet von Energinet.dk und der Antragstellerin zu 3,

Dänemark 2-Deutschland/Luxemburg („DK2-DE/LU“), bewirtschaftet von Energinet.dk und der Antragstellerin zu 1,

Schweden 4-Polen („SE4-PL“), bewirtschaftet von Svenska Kraftnät und PSE S.A.

Dänemark 1-Niederlande („DK1-NL“), bewirtschaftet von Energinet.dk und Tennet TSO B.V.²,

Schweden 4-Deutschland/Luxemburg („SE4-DE/LU“), bewirtschaftet von der Antragstellerin zu 2³,

Norwegen 2-Niederlande („NO2-NL“), bewirtschaftet von Statnett SF und TenneT TSO B.V. und

Norwegen 2-Deutschland/Luxemburg („NO2-DE/LU“), bewirtschaftet von Statnett SF und der Antragstellerin zu 3⁴.

Am 17. Dezember 2018 hat die Beschlusskammer 6 der Bundesnetzagentur die gemeinsame Kapazitätsberechnungsmethode für den Day-Ahead- und den Intraday-Zeitbereich der ÜNB der CCR Hansa gemäß Art. 9 Abs. 7 lit. a i.V.m. Art. 20 Abs. 2 CACM-VO gegenüber der Antragstellerin zu 1 und der Antragstellerin zu 3 genehmigt (Az.: BK6-17-141)⁵ (im Folgenden: „Methode“). Parallel erfolgte die Genehmigung der Methode auch durch die übrigen Regulierungsbehörden der CCR Hansa⁶. Die genehmigte Methode beruht auf dem Ansatz der koordinierten Nettoübertragungskapazität („CNTC“)⁷ mit einer starken Verbindung zu den

² ACER, Entscheidung 04/2019 vom 1. April 2019.

³ ACER, Entscheidung 04/2021 vom 10. Mai 2021.

⁴ ACER, Entscheidung 08/2023 vom 31. März 2023. Näher zur Einbindung Norwegens in die Hansa-Region siehe ACER Entscheidung 08/2023, Rn. 19, Rn. 34, Erwägungsgrund 2 und Artikel 3 Annex I sowie EFTA Surveillance Authority's (ESA) Decision 065/23/COL vom 24. April 2023 Rn. 3, abrufbar unter https://www.eftasurv.int/cms/sites/default/files/documents/gopro/College%20Decision%20-%20Decision%20065_2023_COL%20on%20the%20determination%20of%20capacity%20calculation%20regions.pdf (zuletzt aufgerufen am 22.11.2024) mit Verweis auf die Entscheidung 201705443-14 der norwegischen Regulierungsbehörde NVE-RME vom 18 August 2023.

⁵ Beschluss BK6-17-141 vom 17. Dezember 2018 der Beschlusskammer 6 der Bundesnetzagentur: https://www.bundesnetzagentur.de/DE/Beschlusskammern/1_GZ/BK6-GZ/2017/BK6-17-141/BK6-17-141_Beschluss_vom_17_12_2018.html.

⁶ Zu den Hansa-Regulierungsbehörden zählten zu diesem Zeitpunkt neben der deutschen Regulierungsbehörde BNetzA, die dänische Regulierungsbehörde DUR, die polnische Regulierungsbehörde URE und die schwedische Regulierungsbehörde Ei. Beratend eingebunden war die norwegische Regulierungsbehörde NVE.

⁷ CNTC: Coordinated Net Transmission Capacity; Koordinierte Nettoübertragungskapazität.

angrenzenden CCR, d.h. der CCR Nordic⁸ und der CCR Core⁹.

Am 19. Mai 2021 hat die Bundesnetzagentur in Abänderung des Beschlusses ihrer Beschlusskammer 6 vom 17. Dezember 2018 die gemeinsame Kapazitätsberechnungsmethode für den Day-Ahead- und für den Intraday-Zeitbereich der ÜNB der CCR Hansa gemäß Art. 9 Abs. 13 i.V.m. Artt. 20 ff. CACM-VO gegenüber den Antragstellerinnen zu 1 und 3 genehmigt (Az.: 622-21-004)¹⁰. Parallel erfolgte die Genehmigung der Methode auch durch die übrigen Regulierungsbehörden der CCR Hansa¹¹. Mit Bescheid vom 3. Mai 2022 (Az. 622-22-002)¹² hat die Bundesnetzagentur diese Methode auch gegenüber der Antragstellerin zu 2 genehmigt und so den subjektiven Anwendungsbereich der Methode auf die Antragstellerin zu 2 erweitert.

Am 19. Juli 2024 hat die Antragstellerin zu 3 im Namen aller drei Antragstellerinnen den Antrag auf Genehmigung von Änderungen an der gemeinsamen Kapazitätsberechnungsmethode für den Day-Ahead- und für den Intraday-Zeitbereich in der CCR Hansa gemäß Art. 9 Abs. 13 i.V.m. Artt. 20 ff. CACM-VO in englischer Sprache zur Genehmigung der Bundesnetzagentur zur Genehmigung übermittelt. Die übrigen ÜNB der CCR Hansa haben jeweils gleichlautende Anträge bei ihren Regulierungsbehörden gestellt. Am 21. August 2024 hat die Antragstellerin zu 3 im Namen aller drei Antragstellerinnen eine ins Deutsche übersetzte Fassung dieses Antrags bei der Bundesnetzagentur eingereicht. Damit hat auch die letzte nationale Regulierungsbehörde der CCR Hansa den Antrag der ÜNB am 21. August 2024 erhalten. Dem Methodenänderungsvorschlag wurde das auf den 25. März 2024 datierte „Explanatory Document“¹³ mit weitergehenden Erläuterungen der Hansa-ÜNB beigelegt.

Vor Einreichung des Antrags haben die Hansa-ÜNB die vorgenommenen Änderungen vom 25. März bis 2. Mai 2024 öffentlich konsultiert. Daraufhin sind Stellungnahmen von Green Power Denmark, Energy Traders Europe und dem All NEMO Committee eingegangen.

Green Power Denmark fragt nach einer Begründung für die in Art. 8 Abs. 1 lit. d der Methode vorgeschlagene Vergabebeschränkung „Mindestlastfluss auf DC-Leitungen“. Bezogen auf die in

⁸ Die CCR Nordic wurde durch ACER-Entscheidung 06/2016 vom 17.11.2016 festgelegt und besteht aus den Gebotszonengrenzen DK1-SE3, DK2-SE4, DK1-DK2, SE4-SE3, SE3-SE2, SE2-SE1, SE3-FI, SE1-FI; verwendet werden die zweibuchstabigen Länderkürzel nach ISO 3166 ALPHA-2.

⁹ Die CCR Core wurde durch ACER-Beschluss 06/2016 vom 17.11.2016 festgelegt. Sie besteht aus den Gebotszonengrenzen FR-BE, BE-NL, FR-DE/LU, NL-DE/LU, BE-DE/LU, DE/LU-PL, DE/LU-CZ, AT-CZ, AT-HU, AT-SI, CZ-SK, CZ-PL, HU-SK, PL-SK, HR-SI, HR-HU, RO-HU, HU-SI, DE/LU-AT und SEM-FR.

¹⁰ Genehmigung 622-21-004 vom 19. Mai 2021 der Bundesnetzagentur: <https://www.bundesnetzagentur.de/EU-Genehmigungsverfahren>

¹¹ Die Hansa-Regulierungsbehörden waren zu diesem Zeitpunkt neben der deutschen Regulierungsbehörde BNetzA, die niederländische Regulierungsbehörde ACM, die dänische Regulierungsbehörde DUR, die polnische Regulierungsbehörde URE und die schwedische Regulierungsbehörde Ei. Beratend eingebunden war die norwegische Regulierungsbehörde NVE.

¹² Genehmigung 622-22-002 vom 3. Mai 2022 der Bundesnetzagentur: <https://www.bundesnetzagentur.de/EU-Genehmigungsverfahren>

¹³ https://consultations.entsoe.eu/markets/amendment-proposal-for-ccr-hansa-id-da-ccm/supporting_documents/CCR_Hansa_IDDA_CCM_explanatory_note_final.pdf

Art. 8 Abs. 1 lit. e der Methode vorgeschlagenen Vergabebeschränkung „Begrenzungen der Anzahl von Polaritätsumkehrungen (Zero-Crossings) auf DC-Leitungen für einen bestimmten Zeitraum“ regt Green Power Denmark an, die Höchstzahl der möglichen Polaritätsumkehrungen pro Jahr nicht an einer einzigen Herstellerangabe, sondern an der sozio-ökonomischen Wohlfahrt zu orientieren. Green Power Denmark regt zudem an, im Kontext der in Art. 8 Abs. 1 lit. f der Methode vorgeschlagenen Vergabebeschränkung „Begrenzung des maximalen Lastflusses auf DC-Leitungen, abhängig von Kabeltemperatur und Kabeldruck“ eine erhöhte Kapazität vorzusehen für den Fall, dass Kabeltemperatur und Kabeldruck dies zulassen. Schließlich regt Green Power Denmark an, die alle drei Monate an die Regulierungsbehörden zu berichtenden tatsächlich eingetretenen Kapazitätseinschränkungen zu veröffentlichen.

Energy Traders Europe moniert, dass die vorgeschlagene Kapazitätsberechnungsmethode nicht den Ist-Stand, sondern das Zielmodell abbilde. Aus dem zur Konsultation gestellten Methodenentwurf sei nicht ersichtlich, wie in der Hansa-Region die Vorgabe des Art. 16 Abs. 8 der Verordnung (EU) 2019/943 vom 5. Juni 2019 über den Elektrizitätsbinnenmarkt („EltVO“) aktuell eingehalten werde.

Das All NEMO Committee weist in seiner Stellungnahme darauf hin, dass nicht absehbar sei, welche Auswirkungen die vorgeschlagenen neuen Vergabebeschränkungen auf die Leistungsfähigkeit des Algorithmus haben werden.

Die Hansa-ÜNB haben die eingegangenen Stellungnahmen in ihrem Bericht über die Konsultation vom 17. Juli 2024 gemäß Artikel 12 Abs. 3 CACM-VO dokumentiert und ausgewertet und kenntlich gemacht, warum sie im Vorschlag oder im „Explanatory Document“ Berücksichtigung finden konnten oder nicht.

Der Methodenänderungsvorschlag wurde am 29. August 2024 auf der Internetseite der Bundesnetzagentur veröffentlicht. Es wurde eine Frist zur Stellungnahme bis zum 16. September 2024 eingeräumt. Bei der Bundesnetzagentur sind keine Stellungnahmen eingegangen.

Die Regulierungsbehörden der CCR Hansa haben sich am 10. Februar 2025 darauf geeinigt, die Übertragungsnetzbetreiber dieser Region aufzufordern, den eingereichten Änderungsvorschlag hinsichtlich der Kapazitätsberechnungsmethode für den Day-Ahead- und den Intraday-Zeitbereich zu ändern. Die Bundesnetzagentur hat daraufhin am 11. Februar 2025 im Namen aller Regulierungsbehörden der CCR Hansa den Übertragungsnetzbetreibern der CCR Hansa das Änderungsverlangen in englischer Sprache übermittelt.

Die Regulierungsbehörden der CCR Hansa forderten von den ÜNB der CCR Hansa hauptsächlich Anpassungen hinsichtlich der Vergabebeschränkungen in Art. 8 des Methodenentwurfs. Dazu kam die Forderung nach Anpassungen in Erwägungsgrund 16 und Art. 2 Abs. 1 lit. a des

Methodenentwurfs, die Rolle und Zuständigkeit des koordinierten Kapazitätsberechners („CCC“)¹⁴ betreffend, sowie in Art.4 und Art. 12 des Methodenentwurfs, die Vereinfachung der Kapazitätsberechnungsformel betreffend. Schließlich forderten die Regulierungsbehörden Anpassungen in Art. 16 und Art. 20 des Methodenentwurfs in Bezug auf das Berichtswesen und in Art.21 des Methodenentwurfs in Bezug auf die Aktualisierung der Implementierungsfristen. Hinzu kam die Forderung nach Klarstellungen in Art. 3, Art. 7 und Art. 13 des Methodenentwurfs.

Die Bundesnetzagentur hat das Änderungsverlangen am 20. März 2025 auf ihrer Internetseite veröffentlicht.

Am 22. April 2025 hat der niederländische ÜNB TenneT B.V. im Namen aller drei Antragstellerinnen sowie der übrigen ÜNB der CCR Hansa den geänderten Antrag für eine gemeinsame Kapazitätsberechnungsmethode im Day Ahead- und Intraday-Zeitbereich zur Genehmigung bei der Bundesnetzagentur und bei den übrigen Regulierungsbehörden der CCR Hansa eingereicht. Am 25. Juni 2025 hat die Antragstellerin zu 3 im Namen aller drei Antragstellerinnen der Bundesnetzagentur die deutsche Übersetzung dieses geänderten Antrags übermittelt. Damit hat am 25. Juni 2025 auch die letzte nationale Regulierungsbehörde der CCR Hansa den Antrag der ÜNB erhalten. Inhaltlich haben die Antragstellerinnen die im Änderungsverlangen der Hansa-Regulierungsbehörden vorgesehenen Änderungen teilweise übernommen.

Am 24. Juni 2025 hat die Beschlusskammer 6 der Bundesnetzagentur unter dem Aktenzeichen BK6-22-408 die gemeinsame Kapazitätsberechnungsmethode für den Regelarbeit-Zeitbereich der ÜNB der CCR Hansa gemäß Art. 37 Abs. 3 der Verordnung (EU) 2017/2195 zur Festlegung einer Leitlinie über den Systemausgleich im Elektrizitätsversorgungssystem in der Fassung der Durchführungsverordnung (EU) 2021/280 vom 22. Februar 2021 („EB-VO“) genehmigt („Hansa BT CCM“).¹⁵

Die Regulierungsbehörden der CCR Hansa haben den Methodenentwurf überarbeitet. Die überarbeitete Methode wurde am 16. Juli 2025 von der Bundesnetzagentur im Namen aller Regulierungsbehörden der CCR Hansa den Antragstellerinnen sowie den übrigen ÜNB der CCR Hansa, ENTSO-E¹⁶ und den regionalen Koordinierungszentren Nordic RCC und TSCNET mit Frist zur Stellungnahme bis zum 15. August 2025 übermittelt. Von ENTSO-E und den regionalen Koordinierungszentren haben die Regulierungsbehörden keine Stellungnahmen erhalten. Die Hansa-ÜNB haben mit Schreiben vom 15. August 2025 Stellung genommen.

¹⁴ CCC: Coordinated capacity calculator (koordinierter Kapazitätsberechner) gemäß Art. 2 Nr. 11 CACM-VO

¹⁵ Genehmigung BK6-22-408 vom 24. Juni 2025 der Beschlusskammer 6 der Bundesnetzagentur:

https://www.bundesnetzagentur.de/DE/Beschlusskammern/BK06/BK6_21_AV/Entscheidungen2022/Verfahren_2022.html

¹⁶ ENTSO-E: European Network of Transmission System Operators for Electricity (Europäisches Netzwerk der Übertragungsnetzbetreiber (Strom)) gemäß Art. 28 ff. EltVO.

Der geänderte Methodenentwurf wurde am 31. Juli 2025 auf der Internetseite der Bundesnetzagentur veröffentlicht. Es wurde eine Stellungnahmefrist bis zum 15. August 2025 eingeräumt. Bei der Bundesnetzagentur sind keine Stellungnahmen eingegangen.

Am 25. August 2025 haben sich die Vertreter der Regulierungsbehörden der CCR Hansa im Wege des elektronischen Abstimmungsverfahrens einstimmig auf die Annahme des aus der Anlage I ersichtlichen überarbeiteten Methodenentwurfs für eine gemeinsame Kapazitätsberechnungsmethode im Day Ahead- und Intraday-Zeitbereich in der CCR Hansa gemäß Art. 9 Abs. 13 i.V.m. Artt. 20ff. CACM-VO geeinigt.

II. Inhalt des überarbeiteten Methodenentwurfs

Die Kapazitätsberechnungsmethode basiert auf einer koordinierten Nettoübertragungskapazität („CNTC“), bei der die benachbarten CCRs Core und Nordic, die die lastflussbasierte Berechnungsmethode gewählt haben, eng einbezogen und die Übertragungskapazitäten wirtschaftlich optimiert über den Marktkopplungsalgorithmus vergeben werden.

Art. 1 der Methode regelt Gegenstand und Anwendungsbereich.

Art. 2 der Methode beinhaltet die der Methode zugrunde liegenden Definitionen. Die Änderungen betreffen die Begriffe „Nettoübertragungsnetzkapazität“ (Abs. 1 lit. a), „Advanced Hybrid Coupling“ (Abs. 1 lit. b), „bereits vergebene Kapazität“ (Abs. 1 lit. c) und „verfügbare Übertragungskapazität“ (Abs. 1 lit. d). Die Definition des „Erzeugungsverlagerungsschlüssels“ wurde aus Art. 9 in Art 1 lit. g verschoben.

Art. 3 der Methode beschreibt die Regeln zur Berechnung der zonenübergreifenden Kapazität in der CCR Hansa. Zunächst sind die ÜNB der CCR Hansa verpflichtet, dem koordinierten Kapazitätsberechner („CCC“) bestimmte Input-Parameter für die Berechnung zu übermitteln. Anschließend berechnet der CCC die zonenübergreifende Kapazität als Input für die Marktkopplung im Day-Ahead- und Intraday-Zeitbereich. Im neu eingeführten Art. 3 Abs. 4 werden die Input-Parameter zur Berechnung der zonenübergreifenden Kapazität der Kriegers Flak Combined Grid Solution (KF CGS) näher beschrieben. Der neu eingeführte Art. 3 Abs. 7 verweist bezüglich des Umgangs des CCC mit bereits vergebener Kapazität („AAC“)¹⁷ auf die entsprechenden Definitionen in Art. 2 Abs. 1 lit. c und d, die wiederum in ihrer Neufassung auf Artt. 11, 15 sowie 4 Abs. 3 und 12 Abs. 3 verweisen.

Art. 4 der Methode enthält die mathematische Beschreibung der Kapazitätsberechnung für den Day Ahead-Zeitbereich in der CCR Hansa. Dabei werden die netztopologischen Besonderheiten der Kapazitätsberechnungsregion abgebildet. Die CCR Hansa besteht weitgehend aus vollständig steuerbaren HGÜ-Interkonnektoren sowie dem Wechselstromnetz der Grenze DK1-DE/LU, das

¹⁷ AAC: Already Allocated Capacity (bereits vergebene Kapazität)

aber aufgrund seines radialen Charakters einer HGÜ-Verbindung gleichkommt. Die an einer Gebotszonengrenze auf DC-Interkonnektoren zu vergebenden verfügbaren Übertragungskapazitäten („ATC“)¹⁸ werden errechnet aus der Gesamtübertragungskapazität einer Gebotszonengrenze („TTC“)¹⁹ abzüglich der bereits vergebenen Kapazitäten („AAC“). Bei AC-Interkonnektoren wird eine Zuverlässigkeitsmarge abgezogen, um Unsicherheiten bei der Kapazitätsberechnung zu berücksichtigen. Einen Sonderfall bildet die Kriegers Flak Combined Grid Solution („KF CGS“) an der Gebotszonengrenze DK2-DE/LU. Bei der KF CGS handelt es sich um eine Hybridlösung, die gleichzeitig die Funktion eines Interkonnektors und einer Netzanbindung für einen dänischen sowie zwei deutsche Offshore-Wind-Parks („OWP“) übernimmt. Der in diesen OWP erzeugte Strom hat Vorrang bei der Nutzung der Übertragungskapazität in Richtung des heimischen Marktes.²⁰ Daher kann als grenzüberschreitende Kapazität nur die Übertragungskapazität genutzt werden, die nicht durch die prognostizierte OWP-Einspeisung beansprucht wird. Innerhalb der KF CGS übernimmt der Master Controller for Interconnector Operation („MIO“) u.a. die Lastflusssteuerung in Echtzeit und erstellt zudem stündliche Prognosen der verbleibenden Übertragungskapazität, die dem Markt zur Verfügung gestellt werden kann. Die Änderungen in Art. 4 i.V.m. Art. 2 der Methode betreffen die Darstellung der Berechnungsformel. Ausgangspunkt für die Berechnungsformel in Art. 4 der Methode ist nunmehr die Nettoübertragungskapazität („NTC“) und nicht mehr die verfügbare Kapazität („ATC“). Die Berechnung der Nettoübertragungskapazität wird nunmehr in der Formel in Art. 2 lit d der Methode beschrieben.

Art. 5 der Methode regelt die Auswahl kritischer Netzelemente und Regeln zur Vermeidung unzulässiger Diskriminierung zwischen internen und gebotszonenübergreifenden Austausch.

Art. 6 der Methode regelt die Ermittlung der Zuverlässigkeitsmarge.

Art. 7 der Methode beinhaltet Regeln zur Festlegung der für die Kapazitätsberechnung und die Vergabebeschränkungen relevanten Betriebssicherheitsgrenzen und Ausfälle. Der neu eingeführte Art. 7 Abs. 4 der Methode enthält eine temporäre Ausnahmeregelung für die Kapazitätsberechnung an der Grenze SE4-DE/LU. Demnach sollen die Betriebssicherheitsgrenzwerte des unterlagerten Netzes bei der Kapazitätsberechnung berücksichtigt werden bis zur Fertigstellung der aktuell stattfindenden Netzausbauprojekte in der umliegenden Region.

Art. 8 der Methode trifft Regelungen zu Vergabebeschränkungen. Dabei handelt es sich gemäß Art. 2 Nr. 6 CACM-VO um Beschränkungen, die bei der Kapazitätsvergabe einzuhalten sind, um das Übertragungsnetz innerhalb der Betriebssicherheitsgrenzwerte zu halten, und die nicht durch

¹⁸ ATC: Available Transfer Capacity (verfügbare Übertragungskapazität)

¹⁹ TTC: Total Transfer Capacity (Gesamtübertragungskapazität)

²⁰ Beschluss (EU) 2020/2123 der Kommission vom 11. November 2020 zur Gewährung einer Freistellung für die kombinierte Netzlösung Kriegers Flak gemäß Artikel 64 der Verordnung (EU) 2019/943 des Europäischen Parlaments und des Rates für die Bundesrepublik Deutschland und das Königreich Dänemark.

die grenzüberschreitende Kapazität abgebildet wurden, oder die zur Verbesserung der Effizienz der Kapazitätsvergabe erforderlich sind. Die in Art. 8 der Methode aufgeführten Vergabebeschränkungen sind als Optionen zu betrachten, die ganz oder teilweise auf die einzelnen Interkonnektoren angewendet werden können, soweit dafür ein Erfordernis besteht. Weiter regelt Art. 8 das Verfahren, das von den ÜNB der CCR Hansa im Falle einer Anwendung von Vergabebeschränkungen einzuhalten ist. Dazu zählen u.a. die Konsultation des Marktes, die Information der übrigen ÜNB und der zuständigen Regulierungsbehörden der CCR Hansa, die Begründung sowie die regelmäßige Überprüfung der Erforderlichkeit der Vergabebeschränkungen einschließlich von Analysen zur ökonomischen Wohlfahrt. Art. 8 der Methode wird umfangreich geändert. Die Vergabebeschränkung eines Produktionsmindestniveaus in der Gebotszone entfällt. Neu hinzu kommen die Vergabebeschränkungen „Mindestlastfluss auf DC-Leitungen“, „Begrenzungen der Anzahl von Polaritätsumkehrungen (Zero-Crossings) auf DC-Leitungen für einen bestimmten Zeitraum“, sowie „Begrenzung des maximalen Lastflusses auf DC-Leitungen, abhängig von Kabeltemperatur und Kabeldruck“. Die Voraussetzungen für den Einsatz und die Nutzung von Vergabebeschränkungen werden konkretisiert und teilweise verschärft. Zusätzliche Berichts- und Begründungspflichten werden eingeführt.

Art. 9 der Methode regelt die Ermittlung des Erzeugungsverlagerungsschlüssels.

Art. 10 der Methode regelt die Ermittlung der in der Kapazitätsberechnung zu berücksichtigenden Entlastungsmaßnahmen.

Art. 11 der Methode determiniert Regeln zur Berücksichtigung gegebenenfalls zuvor vergebener gebotszonenübergreifender Kapazität im Day-Ahead-Zeitbereich.

Art. 12 der Methode enthält die mathematische Beschreibung der Kapazitätsberechnungsmethode für den Intraday-Zeitbereich. Die Änderungen in Art. 12 i.V.m. Art. 2 betreffen analog zu den Änderungen in Art. 4 i.V.m. Art. 2 die Darstellung der Berechnungsformel.

Art. 13 der Methode regelt die Neubeurteilung der Kapazität im Intraday-Zeitbereich. Art. 13 Abs. 4 der Methode wurde gestrichen.

Art. 14 der Methode regelt die Anwendung der Art. 5 bis Art. 10 der Methode auch im Intraday-Zeitbereich.

Art. 15 der Methode definiert Regeln zur Berücksichtigung gegebenenfalls zuvor vergebener gebotszonenübergreifender Kapazität im Intraday-Zeitbereich.

Art. 16 der Methode regelt die Validierung der gebotszonenübergreifenden Kapazität.

Art. 17 der Methode enthält Regeln für die Aufteilung der Lastflusskapazitäten kritischer

Netzelemente.

Art. 18 der Methode regelt für den Fall, dass die Kapazitätsberechnung nicht von dem zuständigen CCC der CCR Hansa durchgeführt werden kann, die bilaterale Berechnung und Vereinbarung der Kapazität.

Der neu eingeführte Art. 19 der Methode enthält Regeln zur Bereitstellung von Daten zu Monitoring-Zwecken für die nationalen Regulierungsbehörden.

Der neu eingeführte Art. 20 der Methode beinhaltet Vorgaben zur Veröffentlichung und Qualität der Daten über den Kapazitätsberechnungsprozess sowie zur Berichterstattung.

Der im überarbeiteten Art. 21 der Methode enthaltene Umsetzungszeitplan regelt die Umsetzung der vorliegenden Methode.

Art. 22 der Methode legt Englisch als Referenzsprache fest. Wegen der weiteren Einzelheiten wird auf den Inhalt der Akte sowie auf die vorangegangenen Entscheidungen der Bundesnetzagentur vom 3. Mai 2022 (Az. 622-22-002), vom 19. Mai 2021 (Az. 622-21-004) und vom 17. Dezember 2018 (Az.: BK6-17-141) Bezug genommen.

B.

Die diesem Bescheid als Anlage I anliegende Kapazitätsberechnungsmethode im Day-Ahead- und im Intraday-Zeitbereich der ÜNB der CCR Hansa nach Artt. 20 ff. CACM-VO wird gegenüber der Antragstellerin genehmigt. Der Antrag ist zulässig und begründet.

I. Zulässigkeit

Der Antrag ist zulässig. Die bundes- und unionsrechtlichen Vorschriften über das Verfahren sind gewahrt.

1. Die Antragstellerinnen sind antragsbefugt. Gemäß Art. 9 Abs. 13 Satz 2 CACM-VO können die für die Ausarbeitung eines Vorschlags für Methoden zuständigen ÜNB den Regulierungsbehörden Änderungen dieser Methoden vorschlagen. Dass es sich bei dem Vorschlag um einen verwaltungsrechtlichen Antrag handelt, wird bereits aus dem Umstand ersichtlich, dass dieser laut Art. 9 CACM-VO von den jeweils zuständigen Behörden zu genehmigen ist. Mit dem Eingang der am 19. Juli 2024 der Bundesnetzagentur übermittelten Unterlagen stellten die Antragstellerinnen einen entsprechenden Antrag.

2. Die Zuständigkeit der Bundesnetzagentur für die Genehmigung nach Art. 9 Abs. 7 lit. a i.V.m. Art. 20 Abs. 2 CACM-VO ergibt sich aus § 56 Abs. 1 S. 1 Nr. 1 EnWG i. V. m. Art. 18 Abs. 3 lit. b und Abs. 5 der Verordnung (EG) 714/2009 vom 13. Juli 2009 über die Netzzugangsbedingungen

für den grenzüberschreitenden Stromhandel²¹ bzw. aus § 56 Abs. 1 S. 1 Nr. 1 EnWG i.V.m. Art. 61 und 70 EltVO. Eine obligatorische Kammerzuständigkeit besteht nicht, siehe § 59 Abs. 1 S. 2 Nr. 14 EnWG.

Die Zuständigkeit der Bundesnetzagentur ist auch nicht gemäß Art. 9 Abs. 11 CACM-VO auf ACER übergegangen. Der Eingang der deutschen Übersetzung am 21. August 2024 bei der Bundesnetzagentur setzte den Lauf der sechsmonatigen Einigungsfrist aus Art. 9 Abs. 10 und 13 CACM-VO in Gang. Denn bei der Bundesnetzagentur handelte es sich um die letzte betroffene Regulierungsbehörde, bei der der Antrag einging. Für den Fristbeginn ist gemäß § 23 Abs. 3 VwVfG der Eingang der deutschen Übersetzung maßgeblich. Die Regulierungsbehörden der CCR Hansa haben sich am 10. Februar 2025, mithin vor dem Ablauf der am Freitag, 21. Februar 2025, endenden Frist, gemäß Art. 9 Abs. 10 und Abs. 12 CACM-VO darauf geeinigt, Änderungen an dem zur Genehmigung vorgelegten Methodenentwurf zu verlangen.

Auch im weiteren Verfahrensverlauf ist die Zuständigkeit nicht gemäß Art. 9 Abs. 11 CACM-VO auf ACER übergegangen. Der Eingang der deutschen Übersetzung des auf das Änderungsverlangen hin geänderten Antrags am 25. Juni 2025 bei der Bundesnetzagentur setzte den Lauf der zweimonatigen Einigungsfrist aus Art. 9 Abs. 10 und Abs. 13 CACM-VO in Gang. Denn bei der Bundesnetzagentur handelte es sich wiederum um die letzte betroffene Regulierungsbehörde, bei der der Antrag einging. Für den Fristbeginn ist gemäß § 23 Abs. 3 VwVfG der Eingang der deutschen Übersetzung maßgeblich. Die Regulierungsbehörden der CCR Hansa haben sich am 25. August 2025, mithin innerhalb der mit Ablauf dieses Tages endenden Frist, gemäß Art. 9 Abs. 10 und 13 CACM-VO auf die Genehmigung des Antrags auf Änderung der Methode in der von den Regulierungsbehörden nach Art. 9 Abs. 5 Satz 3 CACM-VO überarbeiteten Form geeinigt.

II. Begründetheit

Der Antrag ist auch begründet. Die zur Genehmigung beantragte Kapazitätsberechnungsmethode erfüllt die Vorgaben von Artt. 20 ff. CACM-VO und steht im Einklang mit den Zielen der CACM-VO. Die seitens der Bundesnetzagentur in Abstimmung mit den anderen Regulierungsbehörden der CCR Hansa vorgenommenen Überarbeitungen entsprechend dem Zweck der CACM-Verordnung und tragen zum ordnungsgemäßen Funktionieren des Strommarktes bei.

1. Die neu gefassten Definitionen in Art. 2 der Methode beinhalten keine inhaltlichen Änderungen, sondern dienen lediglich der Klarstellung.
2. Die neu eingeführten Absätze 4 und 7 in Art. 3 der Methode beinhalten keine inhaltlichen Änderungen, sondern dienen lediglich der Klarstellung.

²¹ Die Verordnung (EG) 714/2009 wurde durch Art. 70 der Verordnung (EU) 2019/943 des Europäischen Parlaments und des Rates vom 5. Juni 2019 über den Elektrizitätsbinnenmarkt aufgehoben.

3. Die Anpassung der Formel in Art. 4 der Methode in Verbindung mit der Neufassung der Definitionen in Art. 2 der Methode enthält keine inhaltliche Änderung der Berechnungsmethode. Lediglich die Art der Darstellung wird anders gewählt. Statt wie bisher in der Formel von der verfügbaren Übertragungskapazität auszugehen, ist Ausgangspunkt nunmehr die Nettoübertragungskapazität. Diese Nettoübertragungskapazität ist aber gemäß Art. 2 lit. d der Methode nach wie vor die Differenz zwischen verfügbarer Übertragungskapazität und bereits vergebener Kapazität. Statt wie bisher in der Formel des Art. 4 der Methode ist das nun in der Definition des Art. 2 lit d der Methode dargelegt. Auch in der Hansa BT CCM wurde diese Darstellungsform gewählt. Die Änderung in Art. 4 i.V.m. Art. 2 der Methode ist nicht zu beanstanden.

4. Die befristete Ausnahmeregelung in Art. 7 Abs. 4 ist nicht zu beanstanden, denn sie dient der Betriebssicherheit, die gem. Art. 3 Buchst. c CACM-VO ein Ziel der CACM-VO darstellt. Die Einhaltung der Betriebssicherheitswerte ist gemäß Art. 16 Abs. 8 lit. a EitVO vorgeschrieben, der das Maximierungsgebot des Art. 16 Abs. 1 EitVO konkretisiert. Art. 7 Abs. 4 der Methode dient der „Gewährleistung der Betriebssicherheit“. Insoweit sind die Änderungen nicht zu beanstanden.

5. Der mit „Methode für Vergabebeschränkungen“ überschriebene Art. 8 der Methode wurde grundlegend überarbeitet. Die geänderten Regelungen stehen in Einklang mit Art. 23 Abs. 3 lit. a und b CACM-VO. Dieser schreibt für die Anwendung von Vergabebeschränkungen durch ÜNB vor, dass diese nur festgelegt werden können anhand von a) Beschränkungen, die erforderlich sind, um das Übertragungsnetz innerhalb der Betriebssicherheitsgrenzwerte zu halten, und die nicht auf effiziente Weise durch maximale Lastflüsse auf kritischen Netzelementen abgebildet werden können, oder b) Beschränkungen, die die ökonomische Wohlfahrt der einheitlichen Day-Ahead-Marktkopplung oder der einheitlichen Intraday-Marktkopplung steigern sollen. Für jede Vergabebeschränkung wird in Art. 8 der Methode konkret dargelegt, unter welchen – die Vorgaben des Art. 23 Abs. 3 CACM-VO konkretisierenden – Voraussetzungen der Einsatz ermöglicht wird. Art. 8 der Methode steht auch in Einklang mit den Zielen der CACM-VO „Gewährleistung der Betriebssicherheit“ und „Optimierung der Berechnung und der Vergabe von zonenübergreifender Kapazität“ gemäß Art. 3 lit. c und d CACM-VO. Vor diesem Hintergrund sind auch die umfangreichen Berichtspflichten gerechtfertigt. Durch die Änderungen in Art. 8 der Methode wird die Konsistenz der gemeinsamen Kapazitätsberechnungsmethode für den Regelarbeit-Zeitbereich der ÜNB der CCR Hansa gemäß Art. 37 Abs. 3 EB-VO („Hansa BT CCM“) mit der hiesigen Methode gewahrt, wie in Art. 37 Abs. 3 EB-VO vorgeschrieben.

6. Die Anpassung der Formel in Art. 12 der Methode in Verbindung mit der Neufassung der Definitionen in Art. 2 der Methode enthält ebenso wie die Anpassung der Formel in Art. 4 der Methode in Verbindung mit der Neufassung der Definitionen in Art. 2 der Methode keine inhaltliche Änderung der Berechnungsmethode, sondern lediglich eine andere Form der Darstellung. Diese ist nicht zu beanstanden.

7. Die Streichung von Art. 13 Abs. 4 der Methode ist ebenso wenig zu beanstanden, da die ÜNB die dort kodifizierte Verpflichtung bereits erfüllt haben.

8. Der neu eingeführte mit „Monitoring-Daten für die nationalen Regulierungsbehörden“ überschriebene Art. 19 der Methode dient dazu, die regulatorische Überwachung der Wahrung der Diskriminierungsfreiheit und Effizienz der Kapazitätsberechnung zu erleichtern. Die Bereitstellung eines diskriminierungsfreien Zugangs zu zonenübergreifender Kapazität ist gemäß Art. 3 Buchst. j CACM-VO eines der Ziele der CACM-VO. Art. 19 dient darüber hinaus der Transparenz gegenüber den nationalen Regulierungsbehörden. Diese ist gemäß Art. 3 Buchst. f CACM-VO ebenfalls eines der Ziele der CACM-VO. Auf die Einhaltung von Geheimhaltungsvorschriften wird hingewiesen. Die Einführung von Art. 19 der Methode ist nicht zu beanstanden.

9. Der neu eingeführte mit „Veröffentlichung von Daten und Berichten“ überschriebene Art. 20 der Methode dient der Transparenz, welches es ebenfalls ein Ziel der CACM-VO ist, siehe Art. 3 Buchst. f CACM-VO. Auf die Einhaltung nationaler Vorschriften sowie von Geheimhaltungsvorschriften wird hingewiesen. Die Einführung von Art. 20 der Methode ist nicht zu beanstanden.

10. Die umfangreichen Änderungen in dem mit „Implementierung“ überschriebenen Art. 21 der Methode dienen der Transparenz sowie der Optimierung der Berechnung und der Vergabe zonenübergreifender Kapazität. Bei alledem handelt es sich um Ziele der CACM-VO, siehe Art. 3 Buchst. d und Buchst. f CACM-VO. Die Änderungen sind nicht zu beanstanden.

III. Kosten

Hinsichtlich der Kosten ergeht ein gesonderter Bescheid nach § 91 EnWG.

Rechtsbehelfsbelehrung

Gegen diesen Bescheid kann innerhalb eines Monats nach Zustellung Beschwerde erhoben werden. Die Beschwerde ist bei dem Beschwerdegericht, dem Oberlandesgericht Düsseldorf (Hausanschrift: Cecilienallee 3, 40474 Düsseldorf), einzureichen.

Die Beschwerde ist zu begründen. Die Frist für die Beschwerdebegründung beträgt einen Monat. Sie beginnt mit der Einlegung der Beschwerde und kann auf Antrag von dem oder der Vorsitzenden des Beschwerdegerichts verlängert werden. Die Beschwerdeschrift und die Beschwerdebegründung müssen durch einen Rechtsanwalt unterzeichnet sein.

Die Beschwerde hat keine aufschiebende Wirkung (§ 76 Abs. 1 EnWG).

Bonn, 16.12.2025

Anlage

Joachim Gewehr
(Referatsleiter)

**Common Coordinated Capacity Calculation Methodology
for the Capacity Calculation Region Hansa
in accordance with Article 20(2) of Commission
Regulation (EU) 2015/1222 of 24 July 2015 establishing
a Guideline on Capacity Allocation and Congestion
Management**

21th August 2025

Contents

WHEREAS	3
Article 1 Subject, Matter and Scope.....	5
Article 2 Definitions and principles	5
Article 3 Rules for Calculating Cross-Zonal Capacity	6
CHAPTER 1 Calculation Methodology for the Day-Ahead Time Frame	7
Article 4 Mathematical Description.....	7
Article 5 Methodology for Critical Network Elements Selection and Rules for Avoiding Undue Discrimination Between Internal and Cross-Zonal Exchanges.....	10
Article 6 Methodology for Determining the Transmission Reliability Margin.....	10
Article 7 Methodology for Determining Operational Security Limits and Contingencies Relevant to Capacity Calculation	11
Article 8 Methodology for Allocation Constraints.....	12
Article 9 Methodology for Determining Generation Shift Keys	14
Article 10 Methodology for Determining Remedial Actions to be Considered in Capacity Calculation.....	14
Article 11 Rules for Taking into Account Previously Allocated Cross-Zonal Capacity in the Day-Ahead Time Frame	15
CHAPTER 2 Capacity Calculation Methodology for the Intraday Time Frame	15
Article 12 Mathematical Description.....	15
Article 13 Frequency of Reassessment of the Capacity in the Intraday Time Frame.....	18
Article 14 Methodologies for Critical Network Element Selection and Rules for Avoiding Undue Discrimination Between Internal and Cross-Zonal Exchanges, Determining the Reliability Margin, Operational Security Limits and Contingencies Relevant to Capacity Calculation and Allocation Constraints, Generation Shift Keys and Remedial Actions to be Considered in Capacity Calculation	18
Article 15 Rules for Taking into Account Previously Allocated Cross-Zonal Capacity in the Intraday Time Frame	19
CHAPTER 3 Common Provisions Applicable to both the Day-Ahead and Intraday Time Frames	19
Article 16 Methodology for the Validation of Cross-Zonal Capacity	19
Article 17 Rules for Sharing the Power Flow Capabilities of Critical Network Elements.....	20
Article 18 Fallback for Capacity Calculation	20
CHAPTER 4 Final provisions	20
Article 19 Monitoring Data to the National Regulatory Authorities	20
Article 20 Publication of Data and Reporting.....	21
Article 21 Implementation	21
Article 22 Language	23
Annex 1 Justification of Usage and Methodology for Calculation of Allocation Constraints in PSE as Described in Article 8(2)	23

THE REGULATORY AUTHORITIES OF THE CAPACITY CALCULATION REGION HANSA, TAKING INTO ACCOUNT THE FOLLOWING:

WHEREAS

- (1) This document is the Common Coordinated Methodology of the Transmission System Operators (hereafter referred to as "TSOs") of the Capacity Calculation Region Hansa (hereafter referred to as "CCR Hansa") as described in the ACER Decision No 04/2024 of 19 March 2024 developed in accordance with Article 15(1) of the Commission Regulation (EU) 2015/1222, establishing a guideline on capacity allocation and congestion management (hereafter referred to as the "CACM Regulation"), as amended from time to time.
- (2) This Common Coordinated Capacity Calculation Methodology (hereafter referred to as "CCM") for the CCR Hansa takes into account the general principles and goals set out in the CACM Regulation, Commission Regulation (EU) 2017/1485 establishing a guideline on electricity transmission system operation (hereafter referred to as the "SO Regulation"), Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (hereafter referred to as "Regulation (EU) 2019/943") as well as in the Commission Decision (EU) 2020/2123 of 11 November 2020 on the derogation for Kriegers Flak Combined Grid Solution (hereafter referred to as "KF CGS") following Article 64 of Regulation (EU) 2019/943.
- (3) The goal of the CACM Regulation is the coordination and harmonisation of capacity calculation and allocation in the day-ahead and the intraday time frames.
- (4) This CCM is required by Article 20(2) of the CACM Regulation which stipulates:

"No later than 10 months after the approval of the Proposal for a capacity calculation region in accordance with Article 15(1), all TSOs in each capacity calculation region shall submit a Proposal for a common coordinated capacity calculation methodology within the respective region. ..."

This CCM is subject to consultation in accordance with Article 12 of the CACM Regulation.

- (5) This CCM covers all requirements as given in Article 21(1), (2) and (3) of the CACM Regulation.
- (6) According to Article 14(1) and 14(2) of the CACM Regulation, all CCR Hansa TSOs shall calculate cross-zonal capacity for at least the day-ahead and intraday time frame. Furthermore, Articles 14(1) and 14(2) require that the cross-zonal capacity for each market-time unit shall be calculated.
- (7) The CCM for the CCR Hansa contributes to, and does not in any way hinder, the achievement of the objectives of Article 3 of the CACM Regulation.
- (8) The CCM for the CCR Hansa is based on a Coordinated Net Transfer Capacity (CNTC) methodology with a strong link to CCR Core and CCR Nordic (hereinafter referred to as "Adjacent CCRs"). CNTC is understood as a NTC methodology, where coordination is done through the use of the common grid model and the calculations carried out by the coordinated capacity calculator. As CCR Hansa bidding-zone borders, including the German – Western Danish Alternating Current (hereafter referred to as "AC") border, are radial interconnections, a CCM based on the flow-based methodology is not more efficient compared to the CNTC approach suggested, assuming the same level of operational security in the Hansa region. Following Article 20(7) of the CACM Regulation, the CCR Hansa TSOs have, in a separate request, motivated the efficiency of CNTC in comparison to the flow-based approach. The request was submitted to and approved by CCR Hansa National Regulatory Authorities (hereafter referred to as "CCR Hansa NRAs") alongside the first version of this CCM.
- (9) The CCM for the CCR Hansa secures optimal use of the transmission capacity as it takes advantage of the flow-

based capacity calculation methodologies being developed simultaneously in CCR Nordic and CCR Core in order to represent the constraints in the AC grid. The use of CCR Hansa interconnector capacity and AC grid capacity is fully integrated in this way, thereby providing a fair competition for the scarce capacities in the system and an optimal system use. There is no predefined and static split of the capacities on critical network elements, and the flows through CCR Hansa interconnectors are optimised based on economic efficiency during the capacity allocation phase.

- (10) The CCM for the CCR Hansa treats all bidding-zone borders in the CCR Hansa and adjacent CCRs equally and provides non-discriminatory access to cross-zonal capacity. It creates a basis for a fair and orderly market and a fair and orderly price formation by implementing a pragmatic CCM solution which is integrated with the methodologies of the adjacent CCRs.
- (11) The CCM for the CCR Hansa will fully apply in a situation where Advanced Hybrid Coupling (hereafter referred to as "AHC") is implemented in a flow-based capacity calculation in CCR Nordic and CCR Core according to the flow-based CCMs of the two regions. The application of AHC ensures that CCR Hansa bidding-zone borders are treated equally to bidding-zone borders in the flow-based CCMs of adjacent CCRs.
- (12) The CCM for the CCR Hansa takes advantage of the flow-based CCMs from adjacent CCRs while ensuring full transparency in the calculation of the cross-zonal capacity. This will in turn result in a better understanding for market participants and improve transparency and reliability of information compared to what is available today on the CCR Hansa bidding-zone borders.
- (13) The CCM for the CCR Hansa foresees a stepwise implementation to the situation where both the CCR Nordic and CCR Core apply AHC. In case that AHC is not yet implemented in either of the adjacent CCRs, or the flow-based CCMs of the adjacent CCRs do not include a selection of Critical Network Elements (CNEs) relevant for CCR Hansa exchanges, the improved capacity calculation process for the CCR Hansa bidding-zone borders will continue until AHC and the selection of CCR Hansa relevant CNEs have been implemented in both adjacent CCRs. This implies that the improved capacity calculation process will also continue on the CCR Hansa bidding-zone borders when the CCR Core have implemented their Standard Hybrid Coupling (hereafter referred to as "SHC"). When applying SHC, the anticipated flows on CCR Hansa bidding-zone borders are taken into account in the available margins of CNEs in the flow-based methodology of CCR Core which is less efficient than applying AHC where this is not necessary.
- (14) With the CCM for the CCR Hansa, the CCR Hansa TSOs are preconditioning the use of AHC in the adjacent CCRs, Nordic and Core, and there will, when implemented, be no undue discrimination between cross-zonal flows within CCR Hansa and adjacent CCRs. It will also ensure that there will be no undue discrimination between bidding-zone borders within CCR Hansa.
- (15) The CCM for the CCR Hansa has no negative consequences on the development of CCMs in adjacent CCRs and can evolve dynamically with the development and merger of CCRs in the future. The CCM for the CCR Hansa therefore does not hinder an efficient long-term operation in CCR Hansa and/or adjacent CCRs, and the development of the transmission system in the European Union.
- (16) With the CCM for the CCR Hansa being aligned with the flow-based CCMs in adjacent CCRs, the selection, inclusion and justification of relevant critical network elements and contingencies, the handling of adjustment of power flows on critical network elements due to remedial actions as well as the mathematical description for the calculation of power transfer distribution factors and the calculation of available margins on critical network elements for the adjacent AC grids are handled by the adjacent CCRs' CCMs.
- (17) Article 27(2) of the CACM Regulation states that CCR Hansa shall set up a Coordinated Capacity Calculator (hereafter referred to as "dedicated CCC") no later than four months after the decision on the CCM referred to in Articles 20 and 21 of the CACM Regulation. The CCR Hansa dedicated CCC will be responsible for calculating the cross-zonal capacities stated in this CCM.

(18) The CCM for the CCR Hansa is aligned with Article 16(8) of Regulation (EU) 2019/943 that sets out that transmission system operators shall not limit the volume of interconnection capacity to be made available to market participants as a means of solving congestion inside their own bidding zone or as a means of managing flows resulting from transactions internal to bidding zones. This shall be considered to be complied when at least 70 % of the transmission capacity respecting operational security limits after deduction of contingencies, as determined in accordance with the CACM Regulation, are available for cross-zonal trade. The Commission Decision (EU) 2020/2123 of 11 November 2020 on the derogation for KF CGS following Article 64 of Regulation (EU) 2019/943 specifies that this minimum percentage should not apply to the overall transmission capacity respecting operational security limits after deduction of contingencies for KF CGS. Instead, it should apply only to the capacity remaining after all capacity forecasted to be required for the transmission of production from the wind farms connected to the KF system to shore has been deducted (hereafter referred to as “residual capacity”). The capacity calculation on the hybrid interconnector KF CGS is done by the Master Controller for Interconnector Operation (hereafter referred to as “MIO”), being a hybrid interconnection system operation tool hosted and operated by 50Hertz and Energinet. The MIO has been acknowledged by the European Commission in its Decision (EU) 2020/2123 as a “separate system operator, autonomously calculating capacity, proposing remedial actions in case of congestion, taking measures to ensure voltage stability, and purchasing countertrading services [...]”. The exception for KF CGS is addressed throughout this CCM. Upon expiration of the derogation for KF CGS, in accordance with the Commission Decision (EU) 2020/2123 of 11 November 2020 following Article 64 of Regulation, the CCR Hansa TSOs shall submit a revised proposal of KF CGS relevant Articles of this methodology, in case the derogation does not get extended.

HEREBY APPROVE THE FOLLOWING COMMON COORDINATED CAPACITY CALCULATION METHODOLOGY FOR THE CCR HANSA:

Article 1

Subject, Matter and Scope

1. As required under Article 20(2) of the CACM Regulation, all TSOs in each CCR shall submit a CCM within the respective region.
2. This document establishes a common coordinated CCM for all bidding-zone borders in CCR Hansa.

Article 2

Definitions and principles

1. For the purpose of this CCM, the terms used will have the meaning of the definitions included in Article 2 of the CACM Regulation, of the Regulation (EU) 2019/943, of the Regulation (EU) No 543/2013 on submission and publication of data in electricity markets and in the Commission Decision (EU) 2020/2123 of 11 November 2020 on the derogation for KF CGS following Article 64 of Regulation (EU) 2019/943.

In addition, in this CCM the following definitions and principles shall apply:

- a. The Net Transfer Capacity (NTC) is the maximum total exchange program between two adjacent bidding zones complying with security standards and taking into account the technical uncertainties on future network conditions: NTCs are calculated by CCCs based on the inputs provided by TSOs, as described in Article 4 and Article 12.
- b. Advanced Hybrid Coupling (AHC) allows for a representation of the impact that flows on the (NTC-based) external borders to the flow-based domain have on the critical network elements within the flow-based

domain. AHC enables the capacity allocation algorithm to make an economic optimisation between allocation on the external borders to the flow-based domain and the borders within the flow-based domain.

- c. The Already Allocated Capacity (AAC) is the capacity allocated for a bidding zone border. Sources for AACs are listed in Article 11 and Article 15 and the capacity given in the day-ahead or intraday timeframes can therefore be adjusted with an AAC value as described in d).
 - d. The Available Transfer Capacity (ATC) is a measure of the transfer capability remaining in the physical transmission network for further commercial activity after already committed uses: $ATC = NTC - AAC$. In case AAC equals zero, the ATC equals the NTC. Adjustments in AACs pursuant to Article 11 and Article 15 lead to adjustments in ATCs. Exceptions apply to the KF CGS, as detailed in Article 4(3) and Article 12(3).
 - e. CCR Hansa interconnector is either a radial DC line(s) or the combination of radial AC lines between the meshed AC grids on either side of the bidding-zone border.
 - f. A Critical Network Element (CNE) is a network element which is significantly impacted by cross-zonal trades. This element can be an overhead line, an underground cable or a transformer.
 - g. The Generation Shift Key (GSK) of a bidding zone is used to calculate the distribution of the power flow on a CCR Hansa interconnector in the adjacent AC grids.
2. In this CCM, 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 the CCM.
 - c. References to an "Article" are, unless otherwise stated, referring to an article of this CCM document.
 - d. Any reference to legislation, regulations, directives, orders, instruments, codes or any other enactment includes any modification, extension or re-enactment of it when in force.

Article 3

Rules for Calculating Cross-Zonal Capacity

1. The capacity calculation approach for CCR Hansa shall follow the coordinated net transmission capacity (CNTC) approach.
2. The CCR Hansa TSOs shall provide the dedicated CCC, a list of CNEs in accordance with Article 5, sufficiently in advance of the day-ahead and the intraday firmness deadline to account for the complexity of processes and IT systems.
3. The CCR Hansa TSOs shall provide the dedicated CCC and Hansa TSOs, in accordance with Article 29(1) of CACM Regulation, sufficiently in advance of the day-ahead and the intraday firmness deadline to account for the complexity of processes and IT systems, the following input parameters for each Market Time Unit (MTU), except for the KF CGS:
 - a. An availability factor of equipment and a loss factor to calculate the TTC/NTC in accordance with the mathematical description in Article 4 and Article 12;
 - b. Operational security limits and contingencies, including thermal capacity limits of the CNEs, in accordance with Article 7;

- c. Allocation constraints in accordance with Article 8;
 - d. Transmission Reliability Margins (TRMs) in accordance with Article 6;
 - e. Generation Shift Keys (GSKs) in accordance with Article 9; and
 - f. Available remedial actions in accordance with Article 10.
4. For the KF CGS, the relevant CCR Hansa TSOs shall provide the dedicated CCC the following information for each MTU:
 - a. The NTC for each MTU calculated by the MIO, sufficiently in advance of the day-ahead and the intraday firmness deadline to account for the complexity of processes and IT systems and in accordance with the mathematical description in Article 4 and Article 12;
 - b. Forecasted wind generation on the offshore wind farms (hereafter referred to as "OWFs") used for NTC calculation.
 5. The CCR Hansa TSOs, or an entity acting on their behalf, shall send for each MTU the AACs to the dedicated CCC without undue delay, following Article 11 and Article 15.
 6. Based on the inputs provided from the CCR Hansa TSOs, the dedicated CCC shall perform the capacity calculation for each bidding-zone border in both directions in accordance with the mathematical descriptions in Article 4 and Article 12.
 7. In the case that the dedicated CCC has been provided with an AAC this shall be taken into consideration in the performed capacity calculation for each bidding-zone border in both directions in accordance with Article 2(1) c and d.
 8. Where a CCR Hansa bidding-zone border has more than one interconnector, the calculated cross-zonal capacity of those interconnectors shall be summed up to determine the full cross-zonal capacity of the CCR Hansa bidding-zone border.
 9. In case the capacity calculation cannot be performed by the CCC dedicated to the respective Hansa border(s), the fallback for capacity calculation in accordance with Article 18 applies.
 10. The dedicated CCC shall submit the results of the capacity calculation to the CCR Hansa TSOs for validation, following the principles described in Article 16.
 11. In accordance with Articles 46 and 58 of the CACM Regulation, the dedicated CCC shall ensure that validated cross-zonal capacities and allocation constraints are provided to relevant NEMOs before the day-ahead and intraday firmness deadlines.

CHAPTER 1

Capacity Calculation Methodology for the Day-Ahead Time Frame

Article 4

Mathematical Description

1. The following mathematical description applies for the calculation of NTC on the DC lines between bidding zones. The capacity shall be calculated for both directions, $A \rightarrow B$ and $B \rightarrow A$.

The $NTC_{i, DC, A \rightarrow B}$ on a bidding-zone border that is connected by DC lines in the direction $A \rightarrow B$ is calculated as follows:

$$NTC_{i, DC, A \rightarrow B} = \alpha_i \cdot P_{i, \max thermal} \cdot (1 - \beta_{i, Loss, A \rightarrow B})$$

Where

A	:=	Bidding zone A.
B	:=	Bidding zone B.
α_i	:=	Availability factor of all equipment which is an integral part of the interconnector and as such can impact the NTC value, defined through scheduled and unscheduled outages, α_i , being a real number in between and including 0 and 1.
$P_{i, \max thermal}$:=	Thermal capacity limit for a DC line i.
$\beta_{i, Loss, A \rightarrow B}$:=	Loss factor in case of explicit grid loss handling on a DC line i in direction $A \rightarrow B$, can be a different value depending on α_i . In case of implicit loss handling, the loss factor is set to zero but taken into account as an allocation constraint in accordance with Article 8. .

2. The following mathematical description applies for the calculation of NTC on the AC lines between bidding zones. The capacity shall be calculated for both directions, $A \rightarrow B$ and $B \rightarrow A$.

The $NTC_{i, AC, A \rightarrow B}$ on a bidding-zone border that is connected by AC lines in the direction $A \rightarrow B$ is calculated as follows:

$$NTC_{AC, A \rightarrow B} = TTC_{A \rightarrow B} - TRM_{A \rightarrow B}$$

Where

A	:=	Bidding zone A.
B	:=	Bidding zone B.
$TTC_{A \rightarrow B}$:=	Total Transfer Capacity of a bidding-zone border in direction $A \rightarrow B$. The TTC is determined according to the following steps: <ol style="list-style-type: none"> 1. Performing load-flow calculation using the CGM and the GSKs according to Article 9. 2. When assessing the loading of the individual circuits of the CCR Hansa interconnector, and taking N-1 security criterion into account, the processes of point 3 and 4 are repeated with the outage of each of the individual circuits on the CCR Hansa interconnector where the minimum TTC for each CCR Hansa interconnector and in each direction is set as TTC in the given direction. 3. Using the GSK to increase the net position of bidding zone A while decreasing the net position of bidding zone B at equal amounts until a circuit or multiple circuits of the CCR Hansa interconnector reach their permanent admissible thermal loading. The TTC is then equal to the maximum exchange between the bidding zones. 4. The process of point 3 is repeated in the opposite direction to determine the TTC in the direction B to A.

$TRM_{A \rightarrow B}$:= Transmission Reliability Margin for a bidding-zone border in direction $A \rightarrow B$, in accordance with Article 6.

3. The following mathematical description is an approximation of the autonomous calculation of NTCs by the MIO on the KF CGS, being a hybrid interconnector and OWF grid connection between DK2-DE/LU. The objective function of the MIO's capacity calculation is the maximization of NTCs on KF CGS, taking into account OWFs infeed, grid losses, active and reactive power as well as physical limits of the assets. The MIO may, in some situations, calculate a higher capacity than what the approximation formula will result in.

The $NTC_{KF\ CGS,DE \rightarrow DK}$ on KF CGS, in direction from DE/LU \rightarrow DK2 is calculated as follows:

$$NTC_{KF\ CGS,DE \rightarrow DK} = \alpha_i \cdot \min \left(\min \left(\frac{P_{\max\ thermal,DE}}{1 + LOSS_{DE} + LOSS_{XB}} + \frac{\min(AAC_{DE}^{Wind}, P_{\max\ thermal,DE} \times LOSS_{DE})}{1 + LOSS_{XB}}, P_{\max\ thermal,DE} \right), \frac{P_{\max\ thermal,XB}}{1 + LOSS_{XB}}, P_{\max\ thermal,DK} - AAC_{DK}^{Wind} \right)$$

The $NTC_{KF\ CGS,DK \rightarrow DE}$ on KF CGS, in direction from DK2 \rightarrow DE/LU is calculated as follows:

$$NTC_{KF\ CGS,DK \rightarrow DE} = \alpha_i \cdot \min \left(\min \left(\frac{P_{\max\ thermal,DK}}{1 + LOSS_{DK}} + \min(AAC_{DK}^{Wind}, P_{\max\ thermal,DK} \times LOSS_{DK}), P_{\max\ thermal,DK} \right), P_{\max\ thermal,XB}, \frac{P_{\max\ thermal,DE} - AAC_{DE}^{Wind}}{1 - LOSS_{XB}}, \frac{P_{\max\ thermal,DE} - AAC_{DE}^{Wind} (1 - LOSS_{DE})}{1 - LOSS_{XB} - LOSS_{DE}} \right)$$

Planned or unplanned outages can lead to a reduction (partial reduction or full reduction to zero) of one or more of the following parameters: $P_{\max\ thermal,DK}$, $P_{\max\ thermal,DE}$ or $P_{\max\ thermal,XB}$

Where:

- DE := Bidding zone DE/LU.
 DK := Bidding zone DK2.
 AAC_{DE}^{Wind} := Forecasted wind generation on the OWF(s) from TSO forecast that is a part of bidding zone DE/LU and connected to the KF CGS, in accordance with Article 11.
 AAC_{DK}^{Wind} := Forecasted wind generation on the OWF(s) from TSO forecast that is a part of bidding zone DK2 and connected to the KF CGS, in accordance with Article 11.

$CP_{OWF, DE}$	Connection Point of offshore windfarm connected in the bidding zone DE/LU to KF CGS.
$CP_{OWF, DK}$	Connection Point of offshore windfarm connected in the bidding zone DK2 to KF CGS.
$LOSS_{DE}$:= Electrical losses between the connection point of KF CGS in bidding zone DE/LU and $CP_{OWF, DE}$
$LOSS_{XB}$:= Electrical losses between the connection point in $CP_{OWF, DK}$ and $CP_{OWF, DE}$
$LOSS_{DK}$:= Electrical losses between the connection point of KF CGS in bidding zone DK2 and $CP_{OWF, DK}$
α_i	:= Availability factor of equipment defined through scheduled and unscheduled outages, α_i , being a real number in between and including 0 and 1.
$P_{max\ thermal, DE}$:= Thermal capacity limit for line section from bidding zone DE/LU to $CP_{OWF, DE}$
$P_{max\ thermal, XB}$:= Thermal capacity limit for line section from $CP_{OWF, DK}$ to $CP_{OWF, DE}$
$P_{max\ thermal, DK}$:= Thermal capacity limit for line section from bidding zone DK2 to $CP_{OWF, DK}$

Article 5

Methodology for Critical Network Elements Selection and Rules for Avoiding Undue Discrimination Between Internal and Cross-Zonal Exchanges

1. Each CCR Hansa TSO shall provide a list of CNEs of its own control area based on operational experience and the topology of its grid. CNEs taken into account in the CCR Hansa capacity calculation shall be part of a CCR Hansa interconnector.
2. CNEs in the AC grids adjacent to the CCR Hansa interconnectors, reflecting the flow interactions between the CCR Hansa interconnectors and the AC grids, are determined in the flow-based parameters of CCR Nordic and CCR Core following their respective methodologies for critical network elements selection and rules for avoiding undue discrimination between internal and cross-zonal exchanges.
3. Following CACM Regulation Article 21(1)(b)(ii), the rule for avoiding undue discrimination is to only include CCR Hansa interconnectors in the CCR Hansa capacity calculation, whereby no discrimination between internal and cross-zonal exchanges is possible.

Article 6

Methodology for Determining the Transmission Reliability Margin

1. The methodology for determining the Transmission Reliability Margin (TRM) applies solely to a border connected by AC lines in the CCR Hansa.
2. The methodology for the TRM is founded on the principles for calculating the probability distribution of the deviations between the expected power flows at the time of the capacity calculation, and realised power flows in real-time, and subsequently specifies the uncertainties to be taken into account in the capacity calculation.
3. Following Article 22(2) of the CACM Regulation, the methodology for the TRM takes into account unintended deviations of physical electricity flows caused by the adjustment of electricity flows within and between control areas and unintended deviations of flows which could occur between the capacity calculation time frame and real time. The activation of remedial actions is not regarded as a source of uncertainty which needs to be taken

into account in the TRM.

4. The TRM calculation consists of the following steps:
 - a. Identification of sources of uncertainty for each TTC calculation. The TTC calculation is based on the CGM which includes assumptions of cross-border exchanges between third parties and forecasts for wind and solar infeed which impact the generation and load pattern as well as the grid topology;
 - b. Derivation of independent time series for each uncertainty and determination of probability distributions (PD) of each time series. Generic time series from an already existing database are used as a starting point. The time series cover an appropriate timespan from the past in order to get a significant and representative amount of data;
 - c. Convolution of the individual PDs and derivation of the TRM value from the convoluted PD. From the convoluted PD the 90th percentile is taken.
5. The inputs for the TRM calculation, as described in Article 6(4)(a), shall be coordinated and commonly agreed by the involved CCR Hansa TSOs to ensure a harmonised approach for deriving the reliability margin from the probability distribution following CACM Regulation Article 22(3).
6. The TRM shall be updated regularly and at least once a year by the CCR Hansa TSOs or by the dedicated CCC.

Article 7

Methodology for Determining Operational Security Limits and Contingencies Relevant to Capacity Calculation

1. In accordance with Article 23(1) of the CACM Regulation, CCR Hansa TSOs shall respect the operational security limits used in operational security analysis in line with Article 72 of the SO Regulation. The operational security limits used in the common capacity calculation are the same as those used in operational security analysis, therefore any additional descriptions pursuant to Article 23(2) of the CACM Regulation are not needed. In particular, CCR Hansa TSOs shall respect the acceptable operating boundaries for secure grid operation such as thermal limits, voltage limits, short-circuit current limits, frequency and dynamic stability limits.
2. Thermal limits of the CCR Hansa CNEs are considered in the TTC/NTC calculation process described in Article 4 for the day-ahead time frame and Article 12 for the intraday time frame.
3. Operational security limits and contingencies of AC grid elements adjacent to the CCR Hansa CNEs, reflecting the flow interactions between the CCR Hansa interconnectors and the AC grids, are expected to be considered in the flow-based parameters of CCR Nordic and CCR Core.
4. A temporary exception shall apply to the DE/LU-SE4 bidding zone border where operational security limits of the local DSO grid on the German side significantly impact the (operational) characteristics of the interconnector and therefore co-determine the available cross-border capacity at the respective bidding zone border. To continue appropriate capacity calculation, these security limits shall be respected in the cross-border capacity calculation until the dedicated grid reinforcement project in the surrounding area is completed. This is without prejudice to the sole reliance of this methodology on the elements constituting the respective interconnectors. In case of any project delay TTG shall inform all Hansa TSOs as well as all Hansa NRAs without undue delay and in close alignment with Svk and Baltic Cable annually report on the status of the grid reinforcements project starting from January 2028.
5. CCR Hansa TSOs can assess individually the operational security limits which cannot be reflected in the flow-based parameters of adjacent CCRs, including but not limited to: voltage stability limits, short-circuit limits and dynamic stability limits, following the provisions of Article 8(1).

Article 8

Methodology for Allocation Constraints

1. In accordance with Article 23(3)(a) or (b) of the CACM Regulation, CCR Hansa TSOs may, besides active power-flow limits on CCR Hansa interconnectors, apply allocation constraints during the capacity allocation phase that are needed to maintain the transmission system within operational security limits which cannot be transformed efficiently into maximum flows on critical network elements or constraints intended to increase economic surplus, to take into account:
 - a. The combined import or export from one bidding zone to other adjacent bidding zones shall be limited in order to ensure adequate level of generation reserves required for secure system operation;
 - b. Maximum flow change on DC lines and KF CGS between MTUs (ramping restrictions);
 - c. Implicit loss factors on DC lines;
 - d. Minimum flow on DC lines;
 - e. Limitations of amount of polarity reversals (zero-crossings) on DC lines for a given period of time;
 - f. Limitation of maximum flow on DC lines dependent on cable temperature and cable pressure.
2. Following Article 8(1)(a), a CCR Hansa TSO may use allocation constraints to ensure a minimum level of operational reserve for balancing in case of a central dispatch model. The allocation constraints introduced are bi-directional, with independent values for directions of import and export, depending on the foreseen balancing situation. The details, justifications for use, and the methodology for the calculation of this kind of allocation constraints are set forth in Annex 1. This allocation constraint may be used for an interim period of 2 years following the implementation of this methodology. If at least one of the Hansa CCR TSOs still wants to use the allocation constraint after this period and all Hansa CCR TSOs agree, they shall deliver a proposal for amendments to this methodology. It shall describe the technical details for calculating the allocation constraint and provide in the explanatory document the impact on economic surplus and the distributional effects during the MTUs when the allocation constraint has been binding during the last 12 months, alternative options and the justification for its need. The proposal shall be sent latest 18 months after the implementation of this methodology in accordance with Article 21(1) and in accordance with the reasons and the methodology for the calculation of the allocation constraint as specified in Annex 1 to this methodology. In case such a proposal has been submitted, the interim period shall be extended until the decision on the proposal is taken by all Hansa CCR NRAs.
3. During the transition period specified in Article 8(2), a CCR Hansa TSO applying this allocation constraint shall:
 - a. calculate the value of external constraints on a daily basis for each DA/ID CC MTU;
 - b. if applicable and in case the external constraint had a non-zero shadow price in more than 0.1% of hours in a quarter, provide to the Hansa NRAs a report analysing per quarter: (i) for each DA/ID CC MTU when the external constraint had a non-zero shadow price the loss in economic surplus due to external 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.
 - c. if applicable and when more efficient, implement alternative solutions referred to in point (b).
4. Following Article 8(1)(b), a ramping restriction is an instrument of system operation to maintain system security for frequency management purposes pursuant to Article 137 of the SO Regulation or to ensure that the maximum flow change on HVDC interconnections between market time units is kept within the technical limits of HVDC interconnections Pursuant to Article 25 of the SO Regulation. The ramping restriction sets the maximum rate of change per CCR Hansa DC Interconnector between MTU shifts (max. MW/MTU).

5. Following Article 8(1)(c), in case of implicit loss handling an implicit loss factor on DC lines during capacity allocation ensures that the DC line will not carry a flow unless the welfare gain exceeds the costs of the corresponding losses.
6. Following Article 8(1)(d), considering a minimum flow on a DC line during capacity allocation ensures that the DC line will not be operated outside its technical capabilities, when the technical characteristics of a specific DC line requires a minimum flow for stable operation.
7. Following Article 8(1)(e), in specific DC line with line commutated converters polarity reversals cause increased electrical stress in the cable insulation. An allocation constraint might be used to limit polarity reversals on a specific DC line to not negatively influence the ageing of the cable and its service life. The specific limit of polarity reversals to enact this allocation constraint will be set by the CCR Hansa TSO(s) operating the DC line.
8. Following Article 8(1)(f), a maximum power flow limit may be imposed on a specific DC line due to a technical limitation within that line's control system where the DC line technology is sensitive to cable temperature and cable pressure. In certain operating conditions (e.g. in case of polarity reversal or ramp-up of the DC line) the operating voltage is reduced from the nominal voltage in order to preserve the integrity of the cable and its service life. This leads to a physical limitation of the maximum power flow across the DC line for a limited period of time. It is particularly crucial within the day-ahead and intraday timeframe that such power flow limitations are considered to ensure that exchanges of energy can be physically delivered.
9. If one, several, or all CCR Hansa TSOs plan to introduce the application of one or more of the allocation constraints, referred to in Article 8(1), on Hansa bidding zone borders, the relevant CCR Hansa TSOs shall consult market participants for at least one month, inform the other CCR Hansa TSOs, and all CCR Hansa NRAs, on the planned allocation constraints, accompanied by detailed descriptions and justifications for the allocation constraints in question, at the latest 2 months prior to the planned application of those allocation constraints. These justifications shall demonstrate compliance with the requirements pursuant to CACM Article 23(3). Allocation Constraints pursuant to Article 8(1)a, b, d, e, f shall be justified according to CACM Article 23 (3)(a) and Allocation Constraints pursuant to Article 8(1)c according to CACM Article 23 (3)(b). If the allocation constraint is applied according to CACM Article 23(3)(a), the Hansa TSOs shall demonstrate why the allocation constraint cannot be transformed efficiently into maximum flows on critical network elements. If the allocation constraint is applied according to CACM art. 23(3)(b), the Hansa TSOs shall demonstrate, before the allocation constraint can be applied, via an analysis that the welfare has increased, i.e. the avoided cost is greater than the loss in economic surplus. The results of the analysis along with the market participants' considerations shall be submitted to the Hansa NRAs.
10. The Hansa TSOs shall review the allocation constraints annually in accordance with CACM Article 27(4)(a), and notify the Hansa NRAs whenever a change has been applied. Additionally, Hansa TSOs shall conduct an impact analysis for the respective allocation constraints at least every 3 years after the implementation of this methodology in accordance with Article 21. This is to ensure that the allocation constraints comply with CACM Article 23(3). The analysis shall at least include the impact on economic surplus and distributional effects per bidding zone from using the allocation constraints. Moreover, the impact analysis shall also include alternative solutions to these allocation constraints ensuring that the application of the allocation constraint is the most efficient solution from a European perspective. The impact analysis shall be submitted to the Hansa NRAs.
11. Prior to the implementation of allocation constraints following Article 8(1)(d,e,f) the relevant TSOs shall submit a written proposal to the market coupling governance bodies, including a justification of the introduction of the constraint. Based upon such justification and the intended use of the allocation constraint, TSOs and NEMOs shall jointly assess and share with NRAs the feasibility of implementation design and use of the constraint, including the testing of actual market outcomes.
12. CCR Hansa TSOs report on statistical indicators of cross-zonal capacity, including allocation constraints where appropriate for each capacity calculation time frame as a part of a report sent biennially by Entso-e to ACER on

capacity calculation and allocation according to Article 31 of the CACM Regulation. Upon request of the CCR Hansa NRAs, CCR Hansa TSOs shall provide additional information about allocation constraints.

13. The shadow prices of the applied allocation constraints in the capacity allocation shall be recorded and reported by the NEMOs to the CCR Hansa TSOs and CCR Hansa NRAs.
14. Allocation constraints are used for the purpose of allocating capacity in accordance with CACM Regulation Articles 46 and 58.

Article 9

Methodology for Determining Generation Shift Keys

1. For the TTC calculation of the radial AC lines as described in Article 4(2), the GSKs of the relevant bidding zones are expected to be defined in the CCMs of adjacent CCRs applying a flow-based capacity calculation approach.
2. Flow interactions between the CCR Hansa interconnectors and the adjacent AC grids are reflected in the corresponding flow-based parameters of adjacent CCRs.

Article 10

Methodology for Determining Remedial Actions to be Considered in Capacity Calculation

1. Non-costly remedial actions shall be used to optimise the TTC.
2. For KF CGS, all available remedial actions shall be used to ensure that operational security limits are not violated in cases where both of the following conditions are applicable:
 - a. The forecasted production on one windfarm exceeds the anticipated day-ahead market outcome by the CCR Hansa TSOs.
 - b. The full transmission capacity towards the corresponding bidding zone of this windfarm is used for the anticipated market outcome of this windfarm, nominated long-term transmission rights, day-ahead and intraday exchanges.
3. Each CCR Hansa TSO shall individually define the remedial actions available to be exclusively taken into account in the CCR Hansa capacity calculation, following CACM Regulation Article 25(1), and shall be shared with the dedicated CCC and all other TSOs according to CACM Regulation Article 29(1).
4. Each CCR Hansa TSO shall ensure that remedial actions are taken into account in capacity calculation under the condition that the remaining available remedial actions, taken together with the reliability margin, are sufficient to ensure operational security, following CACM Regulation Article 25(4).
5. Each CCR Hansa TSO shall ensure that the remedial actions to be taken into account in capacity calculation for the day-ahead and intraday time frames are the same, following CACM Regulation Article 25(6), subject to technical availability for each capacity calculation time frame.
6. Following Articles 25(2) and 25(3) of the CACM Regulation, CCR Hansa TSOs shall coordinate any application of remedial actions used in capacity calculation with the CCR Hansa dedicated CCC and any affected CCR Hansa TSOs. All CCR Hansa TSOs shall agree on the use of remedial actions that require the action of more than one CCR Hansa TSO.
7. The rule for adjustment of power flow is that the CCR Hansa dedicated CCC shall, when remedial actions are applied in accordance with the CCM, adjust the capacity on the CCR Hansa interconnectors where the remedial

action has effect in either direction, following CACM Regulation 21(1)(b)(iv).

Article 11

Rules for Taking into Account Previously Allocated Cross-Zonal Capacity in the Day-Ahead Time Frame

1. In the day-ahead time frame, the CCR Hansa TSOs shall take into account the previously allocated cross-zonal capacity (AAC) as follows:
 - a. Capacity allocated for nominated Physical Transmission Rights (PTRs).
 - b. Capacity allocated for cross-zonal exchange of ancillary services, following Articles 40, 41 or 42 of the Commission Regulation (EU) 2017/2195, establishing a guideline on electricity balancing (EB Regulation), except those ancillary services in accordance with Article 22(2)(a) of the CACM Regulation.
 - c. For KF CGS, AACWind is the forecasted wind generation on the OWF(s) based on the relevant CCR Hansa TSOs forecasts.

AAC shall be taken into account in the day-ahead market as described in the definition in Article 2.

CHAPTER 2

Capacity Calculation Methodology for the Intraday Time Frame

Article 12

Mathematical Description

1. The following mathematical description applies for the calculation of NTC on DC lines between bidding zones.

The capacity shall be calculated for both directions, A→B and B→A.

The $NTC_{i,DC,A\rightarrow B}$ on a DC line i in the direction A→B is calculated as follows:

$$NTC_{i,DC,A\rightarrow B} = \alpha_i \cdot P_{i,maxthermal} \cdot (1 - \beta_{i,Loss,A\rightarrow B})$$

Where

A	:=	Bidding zone A.
B	:=	Bidding zone B.
α_i	:=	Availability factor of all equipment which is an integral part of the interconnector and as such can impact the NTC value, defined through scheduled and unscheduled outages, α_i , being a real number in between and including 0 and 1.
$P_{i,max thermal}$:=	Thermal capacity limit for a DC line i .
$\beta_{i,Loss,A\rightarrow B}$:=	Loss factor for explicit grid loss handling on a DC line in direction A→B, can be a different value depending on α_i . In case of implicit loss handling, the loss factor is set to zero but taken into account as an allocation constraint in accordance with Article 8.

2. The following mathematical description applies for the calculation of NTC on the AC lines. The capacity shall be calculated for both directions, $A \rightarrow B$ and $B \rightarrow A$.

The NTC $AC, A \rightarrow B$ on a bidding-zone border that is connected by AC lines in the direction $A \rightarrow B$ is calculated as follows:

$$NTC_{AC, A \rightarrow B} = TTC_{A \rightarrow B} - TRM_{A \rightarrow B}$$

Where

A := Bidding zone A.

B := Bidding zone B.

$TTC_{A \rightarrow B}$:= Total Transfer Capacity of a bidding-zone border in direction $A \rightarrow B$.

The TTC is determined according to the following steps:

1. Performing load-flow calculation using the CGM and the GSKs according to Article 9.
2. When assessing the loading of the individual circuits of the CCR Hansa interconnector, and to take N-1 security criterion into account, the processes of point 3 and 4 are repeated with the outage of each of the individual circuits on the CCR Hansa interconnector where the minimum TTC for each CCR Hansa interconnector and in each direction is set as TTC in the given direction.
3. Using the GSK to increase the net position of bidding zone A while decreasing the net position of bidding zone B at equal amounts until a circuit or multiple circuits of the CCR Hansa interconnector reach their permanent admissible thermal loading. The TTC is then equal to the maximum exchange between the bidding zones.
4. The process of point 3 is repeated in the opposite direction to determine the TTC in the direction B to A.

$TRM_{A \rightarrow B}$:= Transmission Reliability Margin for a bidding-zone border in direction $A \rightarrow B$, in accordance with Article 6.

3. The following mathematical description is an approximation of the autonomous calculation of NTCs by the MIO on the KF CGS, being a hybrid interconnector and OWF grid connection between DK2-DE/LU. The objective function of the MIO's capacity calculation is the maximization of NTCs on KF CGS, taking into account OWFs infeed, grid losses, active and reactive power as well as physical limits of the assets. The MIO may, in some situations, calculate a higher capacity than what the approximation formula will result in.

The $NTC_{KF\ CGS, DE \rightarrow DK}$ on KF CGS, in direction from DE/LU \rightarrow DK2 is calculated as follows:

$$\begin{aligned}
NTC_{KF\ CGS,DE \rightarrow DK} = & \alpha_i \cdot \min \left(\min \left(\frac{P_{\max\ thermal,DE}}{1 + LOSS_{DE} + LOSS_{XB}} \right. \right. \\
& + \frac{\min(AAC_{DE}^{Wind}, P_{\max\ thermal,DE} \times LOSS_{DE})}{1 + LOSS_{XB}}, \\
& \left. \left. P_{\max\ thermal,DE} \right), \frac{P_{\max\ thermal,XB}}{1 + LOSS_{XB}}, P_{\max\ thermal,DK} \right. \\
& \left. - AAC_{DK}^{Wind} \right)
\end{aligned}$$

The $NTC_{KF\ CGS,DK \rightarrow DE}$ on KF CGS, in direction from DK2 \rightarrow DE/LU is calculated as follows:

$$\begin{aligned}
NTC_{KF\ CGS,DK \rightarrow DE} = & \alpha_i \\
& \cdot \min \left(\min \left(\frac{P_{\max\ thermal,DK}}{1 + LOSS_{DK}} \right. \right. \\
& + \min(AAC_{DK}^{Wind}, P_{\max\ thermal,DK} \times LOSS_{DK}), \\
& \left. \left. P_{\max\ thermal,DK} \right), P_{\max\ thermal,XB}, \frac{P_{\max\ thermal,DE} - AAC_{DE}^{Wind}}{1 - LOSS_{XB}}, \right. \\
& \left. \frac{P_{\max\ thermal,DE} - AAC_{DE}^{Wind}(1 - LOSS_{DE})}{1 - LOSS_{XB} - LOSS_{DE}} \right)
\end{aligned}$$

Planned or unplanned outages can lead to a reduction (partial reduction or full reduction to zero) of one or more of the following parameters: $P_{\max\ thermal,DK}$, $P_{\max\ thermal,DE}$ or $P_{\max\ thermal,XB}$

Where:

DE := Bidding zone DE/LU.
DK := Bidding zone DK2.

AAC_{DE}^{Wind} := Forecasted wind generation on the OWF(s) from TSO forecast that is a part of bidding zone DE/LU and connected to the KF CGS, in accordance with Article 15.

AAC_{DK}^{Wind} := Forecasted wind generation on the OWF(s) from TSO forecast that is a part of bidding zone DK2 and connected to the KF CGS, in accordance with Article 15.

$CP_{OWF, DE}$ Connection Point of offshore windfarm connected in the bidding zone DE/LU to KF CGS.

$CP_{OWF, DK}$ Connection Point of offshore windfarm connected in the bidding zone DK2 to KF CGS.

$LOSS_{DE}$:= Electrical losses between the connection point of KF CGS in bidding zone DE/LU and $CP_{OWF, DE}$

$LOSS_{XB}$:= Electrical losses between the connection point in $CP_{OWF, DK}$ and $CP_{OWF, DE}$

$Loss_{DK}$:= Electrical losses between the connection point of KF CGS in bidding zone DK2 and $CP_{OWF, DK}$
α_i	:= Availability factor of equipment defined through scheduled and unscheduled outages, α_i , being a real number in between and including 0 and 1.
$P_{max\ thermal, DE}$:= Thermal capacity limit for line section from bidding zone DE/LU to $CP_{OWF, DE}$
$P_{max\ thermal, XB}$:= Thermal capacity limit for line section from $CP_{OWF, DK}$ to $CP_{OWF, DE}$
$P_{max\ thermal, DK}$:= Thermal capacity limit for line section from bidding zone DK2 to $CP_{OWF, DK}$

Article 13

Frequency of Reassessment of the Capacity in the Intraday Time Frame

1. The TTC/NTC for the intraday time frame will be reassessed by the dedicated CCC when updated intraday Common Grid Models are available, at least once during the intraday time frame.
2. In case of unexpected events on the CCR Hansa interconnectors, and if these would impact cross-zonal capacity, the capacity in the intraday time frame will be reassessed by the dedicated CCC.
3. The AAC, as defined in Article 15, is continuously updated.

Article 14

Methodologies for Critical Network Element Selection and Rules for Avoiding Undue Discrimination Between Internal and Cross-Zonal Exchanges, Determining the Reliability Margin, Operational Security Limits and Contingencies Relevant to Capacity Calculation and Allocation Constraints, Generation Shift Keys and Remedial Actions to be Considered in Capacity Calculation

The Articles 5 to 10 of this CCM for the day-ahead time frame also apply to the intraday time frame.

Article 15

Rules for Taking into Account Previously Allocated Cross-Zonal Capacity in the Intraday Time Frame

1. In the intraday time frame, the CCR Hansa TSOs shall take into account the AAC as follows:
 - a. Capacity allocated for nominated Physical Transmission Rights (PTRs).
 - b. Capacity allocated for cross-zonal exchange of ancillary services, following Articles 40, 41 or 42 of EB
 - c. Regulation, except those ancillary services in accordance with Article 22(2)(a) of the CACM Regulation.
 - d. Capacity nominated in the day-ahead market.
 - e. For KF CGS, AACWind is the forecasted wind generation on the OWF(s) based on the relevant CCR Hansa TSOs forecasts.
2. AAC shall be taken into account in the intraday market in accordance with the definition in Article 2.

CHAPTER 3

Common Provisions Applicable to both the Day-Ahead and Intraday Time Frames

Article 16

Methodology for the Validation of Cross-Zonal Capacity

1. In reference to the CACM Regulation Article 26(1), each CCR Hansa TSO shall validate and have the right to correct cross-zonal capacity provided by the dedicated CCC, for bidding-zone borders directly relevant to the CCR Hansa TSO.
2. As only CCR Hansa interconnectors are included as CNEs in CCR Hansa capacity calculation, following Article 5, a situation where an internal AC grid element requires a correction of available cross-zonal capacity is not applicable for CCR Hansa.
3. In reference to CACM Regulation Article 26(3) each CCR Hansa TSO may reduce cross-zonal capacity during the validation process referred to in Article 16(1) for reasons of operational security as defined in CACM Regulation Article 2(7).
4. Each CCR Hansa TSO shall validate the cross-zonal capacity by checking that the correct input data, as sent by the CCR Hansa TSO as mentioned in Article 29(1) of the CACM Regulation, is used. CCR Hansa TSOs may employ validation tools and can perform its own calculations using a common grid model.
5. An increase of cross-zonal capacity proposed in the validation phase, shall be commonly agreed by the affected CCR Hansa TSOs.
6. Any information on increased or decreased cross-zonal capacity from adjacent CCCs will be provided by the CCR Hansa dedicated CCC to the CCR Hansa TSOs to be taken into account during the validation.
7. Each CCR Hansa TSO sends its capacity validation result to the dedicated CCR Hansa CCC and to the other CCR Hansa TSOs. In case a CCR Hansa TSO corrects capacity, it shall provide a justification for this to be submitted to

the dedicated CCC. In case of corrected capacities, the dedicated CCC shall inform relevant CCR Hansa TSOs and share the provided justification.

8. The CCR Hansa dedicated CCC shall coordinate with adjacent CCCs during the validation process following CACM Regulation Article 26(4), where at least the corrections in cross-zonal capacity are shared among them.
9. In case capacities on a given bidding-zone border are regularly corrected by the CCR Hansa TSOs, the CCR Hansa TSOs shall evaluate the capacity calculation process including the CCM, and if possible, adjust it to reduce the need for corrections in the future.
10. Every three months, the CCR Hansa dedicated CCC shall report on all reductions made during the validation of cross-zonal capacity to all CCR Hansa NRAs. The report shall include the location and amount of any reduction in cross-zonal capacity and shall give a justification for the reductions, following the requirements in CACM Regulation Article 26(5).

Article 17

Rules for Sharing the Power Flow Capabilities of Critical Network Elements

1. CCR Hansa interconnectors are the only CNEs taken into account in the capacity calculation. None of these elements, or their power flow capabilities, are shared between CCR Hansa bidding-zone borders, following CACM Regulation Article 21(1)(b)(vi), or between CCR Hansa and other CCRs bidding-zone borders in accordance with CACM Regulation Article 21(1)(b)(vii).

Article 18

Fallback for Capacity Calculation

1. In case the capacity calculation cannot be performed by the CCR Hansa dedicated CCC, the concerned CCR Hansa TSOs will bilaterally calculate and agree on cross-zonal capacities. The CCR Hansa TSOs shall individually apply the CCM, and the final cross-zonal capacity will be determined by using the minimum value of the calculated capacities by CCR Hansa TSOs on the relevant bidding-zone border. The concerned CCR Hansa TSOs shall submit the capacities to the CCR Hansa dedicated CCC and to the other CCR Hansa TSOs.

CHAPTER 4

Final provisions

Article 19

Monitoring Data to the National Regulatory Authorities

1. Technical and statistical information related to this CCM shall be made available for monitoring purposes to the CCR Hansa regulatory authorities at their request and specification as a basis for supervising a non-discriminatory and efficient capacity calculation in CCR Hansa.
2. The above-mentioned data requirements are without prejudice to confidentiality requirements pursuant to national legislation.

Article 20 Publication of Data and Reporting

1. The CCR Hansa TSOs or the Hansa TSOs' dedicated CCC shall, in compliance with national legislation and in accordance with Article 3(f) of the CACM Regulation, and in addition to the data items and definitions of Commission Regulation (EU) No 543/2013 on submission and publication of data in electricity markets, publish the following:
 - a. All reductions of capacity in MW done during the validation of cross-zonal capacity pursuant to Article 16 for the day-ahead and intraday timeframe, along with the justification for each reduction.
 - b. The initially computed capacity by the CCC and final validated capacity in MW by the TSOs per MTU for each interconnector pursuant to Article 16.
 - c. Information on plans to apply and/or change allocation constraints pursuant to Article 8(9).
2. All data from Article 20(1)a and b shall be published daily and as soon as available. The information from Article 20(1)c shall be published as soon as available. The data and information from Article 20(1)(a),(b) and (c), as well as the quarterly reporting for Article 16(10) shall be published on a publicly available platform.
3. The CCR Hansa regulatory authorities may request additional information to be published by the CCR Hansa TSOs. For this purpose, all CCR Hansa regulatory authorities shall coordinate their requests among themselves and consult it with stakeholders and the Agency. Each CCR Hansa TSO may decide not to publish the additional information, which was not requested by its competent regulatory authority.
4. The above-mentioned publication and reporting requirements are without prejudice to confidentiality requirements pursuant to national legislation.

Article 21 Implementation

The implementation of this CCM will be a stepwise process with the following milestones:

1. The CCR Hansa CCCs are appointed pursuant to Article 27(2) of the CACM Regulation and the bilateral processes for the computation and coordination of cross-zonal capacities remain in operation.
 - a. For all Hansa bidding zone borders except DE/LU-SE4 and DE/LU-DK2, by the end of Q2 2026, the CCR Hansa dedicated CCCs shall be in operation and calculate cross-zonal capacities by matching of TTCs/NTCs and AACs, provided by TSOs, and taking into account the validation by the responsible TSOs.
 - b. Within 12 months after the implementation of the other bidding zone borders in accordance with Article 21(1)(a), the dedicated CCCs shall calculate cross-zonal capacities by matching TTCs/NTCs and AACs also for the bidding zone borders DE/LU-SE4 and DE/LU-DK2.
2. The following milestones in the Adjacent CCRs, are further steps in the implementation of this CCM:
 - a. After Article 21(1) is implemented for all bidding zone borders and within 12 months after the flow-based day-ahead CCMs of CCR Core and of CCR Nordic have been implemented, including AHC, for the CCR Hansa interconnectors, CCR Hansa CCCs shall start computing cross-zonal capacities according to Article 4 and the Hansa TSOs shall provide the necessary inputs.

- b. After Article 21(1) is implemented for all bidding zone borders and 12 months after the flow-based intraday CCMs of CCR Core and of CCR Nordic have been implemented including AHC for the CCR Hansa interconnectors, CCR Hansa CCCs shall start computing cross-zonal capacities according to Article 12. The Hansa TSOs shall provide the necessary inputs. This requires that the Single Intraday Coupling (SIDC) solution can apply flow-based parameters and that relevant TSOs and the NEMOs processes have been adapted accordingly.
3. The final milestone of this CCM requires the utilization of CGMs:
 - a. Within 12 months after the application of the pan European DA CGM in CGMES format in the Hansa CCR ROSC processes, CCR Hansa CCCs shall utilize CGMs in their computation of day-ahead cross-zonal capacities based on the implemented methodology for the CGMs.
 - b. Within 12 months after the application of the pan European ID CGM in CGMES format in the Hansa CCR ROSC processes; CCR Hansa CCCs shall utilize CGMs in their computation of intraday cross-zonal capacities based on the implemented methodology for the CGMs.
4. Following Article 21(1), the CCR Hansa CCCs will calculate the cross-zonal capacity while the CCR Hansa TSOs will send TTCs/NTCs to the CCR Hansa CCCs based on current methodologies. The minimum capacity calculated will prevail and will be applied by the CCR Hansa CCCs. The resulting cross-zonal capacities are subject to validation by each CCR Hansa TSO for its bidding-zone borders. The CCR Hansa CCCs provide the validated cross-zonal capacities to the allocation mechanism.
5. Following Article 21(2)(a), with the implementation of day-ahead AHC in CCR Core and CCR Nordic, the influence of the CCR Hansa interconnectors on the AC grid will be market driven, ensuring equal treatment of the CCR Hansa bidding-zone borders and bidding-zone borders in the adjacent CCRs. AHC complements the cross-zonal capacity calculation of the Hansa CCR, meaning that the TTC/NTC computations according to Article 4 is in effect in addition to AHC. Before AHC is applied by the CCR Hansa TSOs on each side of the CCR Hansa interconnectors, a testing phase of at least 6 months will be coordinated with the CCR Nordic and CCR Core respectively as required in CACM Regulation Article 20(8).
6. Following Article 21(2)(b), with the implementation of intraday AHC in CCR Core and CCR Nordic, the influence of the CCR Hansa interconnectors on the AC grid will be market driven, ensuring equal treatment of the CCR Hansa bidding-zone borders and bidding-zone borders in the adjacent CCRs. AHC complements the cross-zonal capacity calculation of the Hansa CCR, meaning that the TTC/NTC computations according to Article 12 is in effect in addition to AHC. With the application of flow-based in SIDC and adaptation of the processes on relevant CCR Hansa TSOs and NEMOs side, there will be no need to translate flow-based parameters into ATC constraints for the intraday market, after a required 6 months testing phase following CACM Regulation Article 20(8).
7. With the implementation of the two-days ahead, day-ahead and intraday CGMs, CCR Hansa TSOs will use the same CGM input in their CCR Hansa related capacity calculation processes. This will ensure that the forecast of demand, generation and line availability are the same, thus increasing the coordination of the capacity calculation. Following Article 21(3)(a) and (b), when the CCR Hansa CCCs are computing cross-zonal capacities according to Article 4 and 12 and the CGMs are implemented, the CCR Hansa CCCs shall utilize CGMs in their computation of day-ahead and intraday cross-zonal capacities.

Article 22 Language

1. The reference language for this CCM is English.
2. To avoid any doubt, where CCR Hansa TSOs need to translate this CCM into their national language(s), in the event of inconsistencies between the English version published by the TSOs in accordance with Article 9(14) of the CACM Regulation and any version in another language, the concerned CCR Hansa TSOs shall, in accordance with national legislation, provide the relevant CCR Hansa NRAs with an updated translation of the CCM.

Annex 1 Justification of Usage and Methodology for Calculation of Allocation Constraints in PSE as Described in Article 8(2)

Allocation constraints in Poland are applied as stipulated in Article 8(2) of the CCM. These constraints reflect the ability of Polish generators to increase generation (potential constraints in export direction) or decrease generation (potential constraints in import direction) subject to technical characteristics of individual generating units as well as the necessity to maintain minimum generation reserves required in the whole Polish power system to ensure secure operation. This is explained further in subsequent parts of this Annex.

Rationale behind implementation of allocation constraints on PSE side

Implementation of allocation constraints as applied by PSE side is related to the fact that under the conditions of the integrated scheduling-based market model applied in Poland (also called central dispatching model) the responsibility of the Polish TSO on system balance is significantly extended comparing to such standard responsibility of TSOs in so-called self-dispatch market models. Central dispatching is one of the two dispatching models authorized by Article 14(2) of the EB Regulation. In self-dispatch markets balance responsible parties (BRPs) are themselves supposed to take care about their generating reserves and load following, while TSO ensures them just for dealing with contingencies in the time frame of up to one hour ahead. In a central dispatching model, it is the TSO that dispatches generating units taking into account operational constraints, transmission constraints and reserve capacity requirements with the aim to balance national generation, demand and cross-border exchanges while ensuring secure operation of the transmission system. When the TSO is preparing generation dispatch plans for the operational day, energy and reserves in the central dispatching model are ensured simultaneously (inherent feature of central dispatching systems with accordance to Articles 2(18) and 2(19) of the EB Regulation). Results of the wholesale market together with the results of the balancing capacity reserves market serve as a basis for the generation dispatch performed under integrated scheduling process.

In central dispatching model, the above process is realized in an integrated scheduling process run as a single optimization problem called security constrained unit commitment (SCUC – where generation units are being dispatch on and off) and security constrained economic dispatch (SCED – where generation output for all dispatched generation units is determined). Integrated scheduling process starts in the late afternoon of D-1, already well after the day-ahead capacity calculation and SDAC, and continues iteratively by recalculating the future dispatch plans for each particular hour of day D until its real-time execution (new recalculation at least every hour). Within aforementioned integrated scheduling process, generation units connected to the transmission grid are dispatched by PSE with the aim to respect power purchase agreements concluded between market participants on the wholesale market, while minimizing overall costs of dispatch adjustments and balancing energy activation to cover the residual demand (being the part of end users demand not covered by commercial contracts). When doing so, PSE is obliged to respect power system operating conditions, as well as the technical characteristics of generation units both on the level of individual generation units and on the level of power plants. Unit capabilities, considering their inter-temporal limitations (ramping rates), are also considered in this process.

According to the national legislation, PSE is legally obliged to ensure availability of sufficient level of generating reserves for the whole Polish power system in order to safeguard its secure operation in case of contingency, as well as in case of insufficient and ineffective balancing activities performed by market participants in Poland. However, if balancing service providers (generating units) would already sell too much energy in the day-ahead market in form of high exports, they may not be able to provide sufficient upward reserve capacity within the integrated scheduling process as required by national legislation. This conclusion equally applies for the case when market participants import significant amount of energy, as it could result in balancing service providers being unable to provide downward regulation capabilities due to not securing enough generation levels in the day-ahead market. The strength of the imbalance settlement pricing is also important in this process, together with the maturity and the ability of the market participants to maintain balanced portfolios under objectively high RES and demand uncertainties and underdeveloped intraday markets.

This leads to implementation of allocation constraints, being the necessary means to ensure operational security of Polish power system in terms of securing generating capacities for upward or downward regulation, as well as in order to cover the national imbalances in the direction of shortage (i.e. cover the residual demand) and surplus (i.e. manage and regulate down the surplus of power during periods of oversupply). Excluding such a solution and depriving TSOs under central dispatching model from the usage of allocation constraints to set appropriate limits to how much electricity can be imported or exported by the system as a whole may lead to insufficient balancing capacity reserves, making the provisions in Articles 2(19), 18 and 25 of the EB Regulation void, and making it impossible or at least much more difficult to comply with Articles 153, 157 and 160 of the SO Regulation.

It needs to be highlighted that despite implementation of explicit balancing capacity procurement in Poland as per 14 June 2024, and despite maintaining the use of allocation constraints, PSE still has to apply remedial measures at large scale in order to ensure equilibrium between demand and supply in the Polish power system. These measures are mostly the non-market-based curtailment of RES (in case of energy surplus) and emergency exchanges with neighbouring TSOs (in case of energy surplus or shortage). Both aforementioned measures have severe negative consequences, such as difficulties for TSO and DSO dispatching teams to manage hundreds of operational commands issued to dispersed RES facilities in very short time, difficulties of RES facility owners to respond to dispatching commands issued with short notice, as well as depletion of operational reserves of neighbouring TSOs when asked for emergency exchanges, reducing overall European power system resilience. In many instances of time, neighbouring TSOs are unable to provide the requested support.

Balancing market reform executed on 14 June 2024 has significantly improved market price signals, so that balancing responsible parties are better reacting to dynamically changing power system situation. Nonetheless, the observed levels of balancing energy that needs to be activated by PSE under integrated scheduling process is still very high, often exceeding the procured balancing capacity. This implies that the new improved balancing market prices are still unable to convey sufficient incentives for market participants to improve generation and demand planning as BRPs still do not balance their portfolios earlier on more attractive day-ahead and intraday markets. Moreover, new balancing capacity reserves procurement process is still immature and suffers from lack of liquidity, low supply and low competition. Both aforementioned items are a subject of intensive analysis on PSE side with the aim to prepare improvements and increase effectiveness of price signals.

Specification of security limits violated if the allocation constraint is not applied

With regard to constraints used to ensure sufficient operational reserves, if one of interconnected systems suffers from insufficient reserves in case of unexpected outages or unplanned load change (applies to central dispatching model), there may be a sustained deviation from scheduled exchanges of the TSOs in question. These deviations may lead to an imbalance in the whole synchronous area, causing the system frequency to depart from its nominal level. Even if frequency limits are not violated, as a result, deviation activates frequency containment reserves, which will thus not be available for other contingencies, if required as designed. If another contingency materializes, the frequency may in consequence easily go beyond its secure limits with all related negative consequences. This is why such a situation can lead to a breach of operational security limits and must be prevented by keeping necessary reserves within all bidding zones, so that no TSO deviates from its schedule in a sustained way (i.e. more than 15 minutes, within which frequency restoration reserve shall be fully deployed by any given TSO). Finally, the inability to maintain scheduled area balances resulting from insufficient operational reserves will lead to uncontrolled changes

in power flows, which may trigger lines overload (i.e. exceeding the thermal limits) and as a consequence can lead to system splitting with different frequencies in each of the subsystems. The above issue affects PSE in a different way from other TSOs due to reasons explained in the subsequent paragraph.

PSE role in system balancing

PSE directly dispatches all major generating units in Poland taking into account their operational characteristics and transmission constraints in order to cover the load forecasted by PSE, having in mind adequate reserve requirements. To fulfil this task PSE runs the process of operational planning, which begins three years ahead with relevant overhaul (maintenance) coordination and is continued via yearly, monthly and weekly updates to day-ahead SCUC and SCED. The results of this day-ahead market are then updated continuously in intraday time frame up to real time operation. In a yearly time frame PSE tries to distribute the maintenance overhauls requested by generators along the year in such a way that the minimum year ahead generation reserve margin¹ over forecasted demand including already allocated capacities on interconnections is kept on average in each month. The monthly and weekly updates aim to keep a certain reserve margin on each day², if possible. This process includes also network maintenance planning, so any constraints coming from the network operation are duly taken into account.

The day-ahead SCUC process aims to achieve a set value of spinning reserve³ (or quickly activated, in current Polish reality only units in pumped storage plants) margin for each hour of the next day, enabling up and down regulation. This includes primary and secondary control power pre-contracted as an ancillary service. The rest of this reserve comes from usage of balancing bids, which are mandatory to be submitted by all centrally dispatched generating units (in practice all units connected to the transmission network and major ones connected to 110 kV, except Combined Heat and Power (CHP) plants as they operate mainly according to heat demand). The remaining generation is taken into account as scheduled by owners, which having in mind its stable character (CHPs, small thermal and hydro) is a workable solution. The only exception from this rule is wind generation, which due to its volatile character is forecasted by PSE. Thus, PSE has the right to use any available centrally dispatched generation in normal operation to balance the system. The negative reserve requirements during low load periods (night hours) are also respected and the potential pumping operation of pumped storage plants is taken into account, if feasible.

The further updates of SCUC/SCED during the operational day take into account any changes happening in the system (forced outages and any limitations of generating units and network elements, load and wind forecast updates, etc.). It allows to keep one hour ahead spinning reserve at the minimum level of 1000 MW, which corresponds to the size of the largest unit in the system.

Determination of allocation constraints in Poland

When determining the allocation constraints, the Polish TSO takes into account the most recent information on the aforementioned 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 MTU, and separately for directions of import to Poland and export from Poland.

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

$$\text{EXPORT}_{constraint} = P_{CD} - (P_{NA} + P_{ER}) + P_{NCD} - (P_L + P_{UPres}) \quad (1)$$

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

Where:

1 The generation reserve margin is regulated by the Polish grid code and currently set at 18% (point 10.2.11(3)). It is subject to change depending on the results of the development of operational planning processes.

2 The generation reserve margin for monthly and weekly coordination is also regulated by the Polish grid code (point 10.2.11(2) and (3)).

3 These values are regulated by the Polish grid code (point 10.2.11(1)) and subject to change.

P_{CD}	Sum of available generating capacities of centrally dispatched units as declared by generators ⁴
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 weather-dependent intermittent renewable generation: forecasted by PSE)
P_{NA}	Generation not available due to grid constraints (both planned outage and/or anticipated congestions).
P_{ER}	Generation unavailability's adjustment resulting from issues not declared by generators, forecasted by PSE due to exceptional circumstances (e.g. cooling conditions or prolonged overhauls)
P_L	Demand forecasted by PSE
P_{UPres}	Minimum reserve for up regulation
$P_{DOWNres}$	Minimum reserve for down regulation

For illustrative purposes, the process of practical determination of allocation constraints in the framework of day-ahead transfer capacity calculation is illustrated below: figures 1 and 2. The figures illustrate how a forecast of the Polish power balance for each hour of the next day is developed by the Polish TSO day ahead in the morning in order to determine reserves in generating capacities available for potential exports and imports, respectively, for day ahead market. For the intraday market, the same method applies mutatis mutandis.

Allocation constraint in export direction is applicable if Export is lower than the sum of transfer capacities on all Polish interconnections in export direction. Allocation constraint in import direction is applicable if Import is lower than the sum of transfer capacities on all Polish interconnections in import direction.

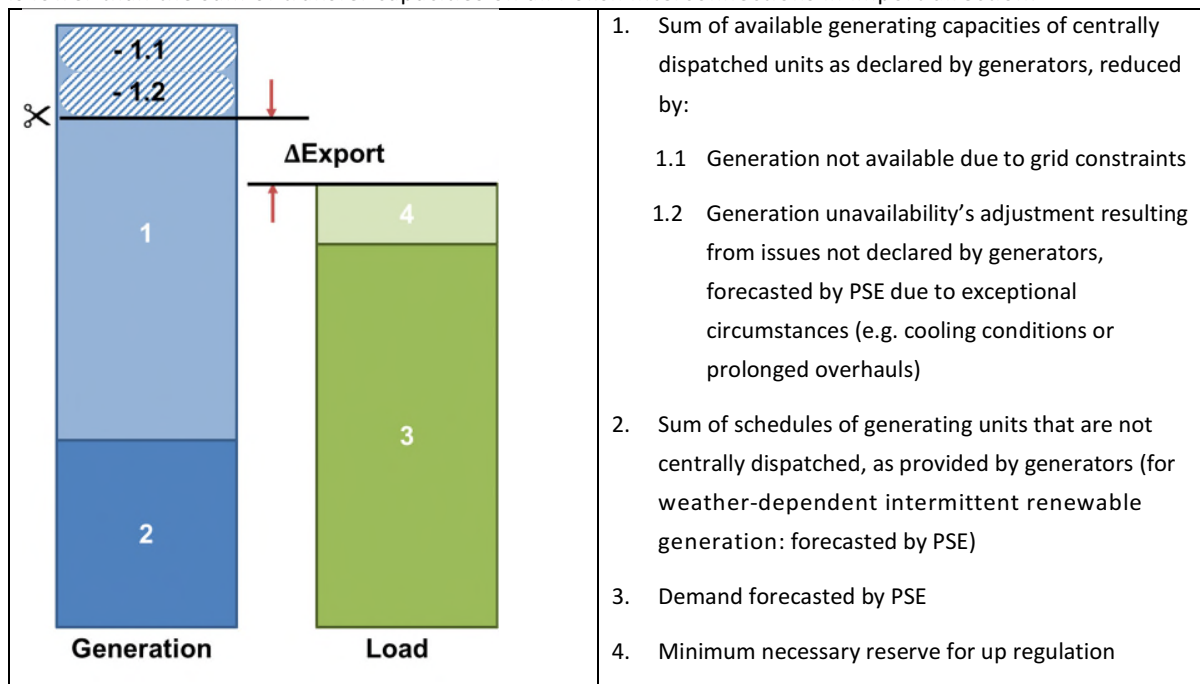


Figure 1: Determination of allocation constraints in export direction (generating capacities available for potential exports) in the framework of day-ahead transfer capacity calculation.

⁴ 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.

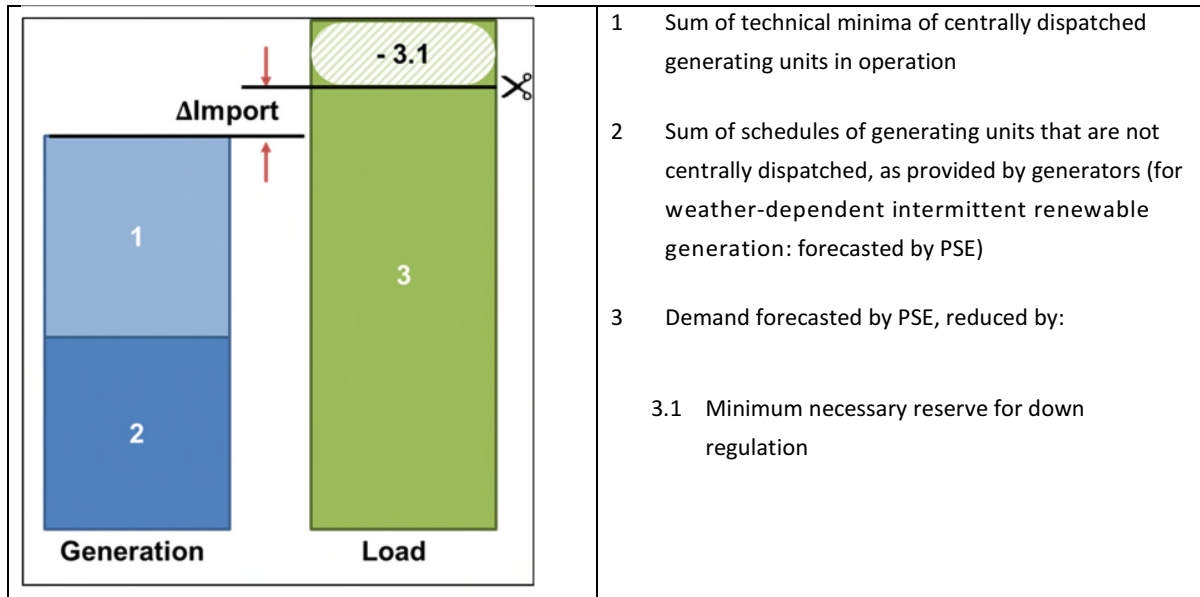


Figure 2: Determination of allocation constraints in import direction (reserves in generating capacities available for potential imports) in the framework of day-ahead transfer capacity calculation.

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 day-ahead process, these are calculated in the morning of D-1, resulting in independent values for each MTU, and separately for directions of import to Poland and export from Poland.

Impact of allocation constraints on single day-ahead coupling and single intraday coupling

Allocation constraints in form of allocation constraints as applied by PSE do not diminish the efficiency of day-ahead and intraday market coupling process. Given the need to ensure adequate availability of generation and generation reserves within Polish power system by PSE as TSO acting under central-dispatch market model, imposing constraints on maximum import and export in market coupling process – if necessary – is the most efficient manner of reconciling system security with trading opportunities. This approach results in at least the same level of generating capacities participating in cross border trade as it is the case in self-dispatch market model, where reserves are bought in advance by BRPs or TSO, so they do not participate in cross-border trade, either. Moreover, this allows to avoid competition between the TSO and market participants for generation resources.

It is to be underlined that allocation constraints applied in Poland will not affect the ability of any Hansa country to exchange energy, since these constraints only affect Polish export and/or import. Hence, transit via Poland will be possible in case of allocation constraints applied.

Impact of allocation constraints on adjacent CCRs

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 border (i.e. Core, Baltic and Hansa).

It is to be underlined that this solution has been proven as the most efficient application of allocation constraints. Considering allocation constraints separately in each CCR would require PSE to split global allocation 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 generation requirements, or when Poland is unable to export any more power due to insufficient generation reserves in upward direction, Polish transmission

infrastructure still can be – and indeed is - offered for transit, increasing thereby trading opportunities and social welfare in all concerned CCRs.

Time periods for which allocation constraints are applied

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

Why the allocation constraints cannot be efficiently translated into capacities of individual borders offered to the market

Use of capacity allocation constraints aims to ensure economic efficiency of the market coupling mechanism on these interconnectors while meeting the security requirements of electricity supply to customers. If the generation conditions described above were to be reflected in cross-border capacities offered by PSE in form of an appropriate adjustments of border transmission 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 CNTC approach, this would need to be done in a form of ATC reduction per border. 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 – overstated on one interconnection and underestimated on the other, or vice versa. Consequently, application of allocation constraints to tackle the overall Polish balancing constrains at the allocation phase allows for the most efficient use of transmission infrastructure, i.e. fully in line with price differences in individual markets.