

**DECISION No 07/2021  
OF THE EUROPEAN UNION AGENCY  
FOR THE COOPERATION OF ENERGY REGULATORS**

**of 14 June 2021**

**on the Amendment of the Methodology for Coordinating Operational  
Security Analysis**

THE EUROPEAN UNION AGENCY FOR THE COOPERATION OF ENERGY  
REGULATORS,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2019/942 of the European Parliament and of the Council of 5 June 2019 establishing a European Union Agency for the Cooperation of Energy Regulators<sup>1</sup>, and, in particular, Article 5(2) thereof,

Having regard to Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation<sup>2</sup>, and, in particular, Article 6(2)(c) and Article 7(4) thereof,

Having regard to the outcome of the consultation with all national regulatory authorities and transmission system operators,

Having regard to the outcome of the consultation with ACER's Electricity Working Group ('AEWG'),

Having regard to the favourable opinion of the Board of Regulators of 1 June 2021, delivered pursuant to Article 22(5)(a) of Regulation (EU) 2019/942,

Whereas:

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<sup>1</sup> OJ L158, 14.6.2019, p. 22.

<sup>2</sup> OJ L 220, 25.8.2017, p. 1.

## **1. INTRODUCTION**

- (1) Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation (the ‘SO Regulation’) laid down a range of requirements for operational security analysis coordination, including requirements for the development of a methodology for coordinating operational security analysis (‘CSAM’) in accordance with Article 75 of the SO Regulation.
- (2) On 19 June 2019, ACER issued its Decision No 07/2019 on the all transmission system operators’ (‘TSOs’) proposal for a methodology for coordinating operational security analysis<sup>3</sup>. In accordance with this decision, no later than 18 months after the adoption of the CSAM, all TSOs had to jointly develop a proposal for amendments to Articles 21 and 27 of the CSAM in accordance with Article 7(4) and pursuant to Article 75 of the SO Regulation. Pursuant to Article 5(2) of Regulation (EU) 2019/942, where proposals for common terms and conditions or methodologies or their amendments, as the case might be, require the approval of all regulatory authorities, those proposals shall be submitted to ACER for revision and approval.
- (3) Accordingly, on 18 December 2020, all TSOs submitted to ACER a proposal for amendment to the CSAM (‘proposal for amendment’). The present Decision revises and approves the proposal for amendment. Annex I to this Decision sets out the amended CSAM, pursuant to Article 75 of the SO Regulation.

## **2. PROCEDURE**

### **2.1. Proceedings before ACER**

- (4) On 13 August 2020, all TSOs published the proposed amendments<sup>4</sup> to Articles 21 and 27 of the CSAM developed in accordance with Article 75(1) of the SO Regulation for public consultation, in accordance with Articles 7(4) and 11 of the SO Regulation. The consultation lasted from 13 August 2020 until 23 September 2020.
- (5) On 18 December 2020, all TSOs submitted their proposal for amendment to the CSAM to ACER for decision. During the decision making process, ACER closely cooperated with all regulatory authorities and TSOs and further consulted on the proposed

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<sup>3</sup> ACER Decision No 07/2019

[https://www.acer.europa.eu/Official\\_documents/Acts\\_of\\_the\\_Agency/Individual%20decisions/ACER%20Decision%2007-2019%20on%20all%20TSOs%27%20proposal%20for%20CSAM.pdf](https://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/Individual%20decisions/ACER%20Decision%2007-2019%20on%20all%20TSOs%27%20proposal%20for%20CSAM.pdf)

and

[https://www.acer.europa.eu/Official\\_documents/Acts\\_of\\_the\\_Agency/ANNEXESTODECISIONOFTHEAGENCYNo072019/Annex%20I%20-%20ACER%20Decision%20on%20CSAM.pdf](https://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/ANNEXESTODECISIONOFTHEAGENCYNo072019/Annex%20I%20-%20ACER%20Decision%20on%20CSAM.pdf)

<sup>4</sup> [Amendments to the Coordinated Security Analysis methodology \(SO GL Art. 75\) - European Network of Transmission System Operators for Electricity - Citizen Space \(entsoe.eu\)](#)

amendments during teleconferences, virtual meetings and through exchanges of textual amendments via emails. In particular, the following procedural steps were taken:

- 20 January 2021: teleconference with all regulatory authorities and TSOs;
- 28 January 2021: teleconference with all regulatory authorities and TSOs to discuss mapping;
- 27 January 2021: teleconference with all regulatory authorities and TSOs;
- 2 February 2021: teleconference with all regulatory authorities and TSOs to discuss mapping;
- 3 February 2021: teleconference with all regulatory authorities and TSOs;
- 17 February 2021: teleconference with all regulatory authorities and TSOs;
- 19 February 2021: teleconference with all regulatory authorities and TSOs to discuss mapping;
- 25 February 2021: teleconference with all regulatory authorities and TSOs to discuss mapping;
- 4 March 2021: teleconference with all regulatory authorities and TSOs to discuss mapping;
- 10 March 2021: teleconference with all regulatory authorities and TSOs to discuss mapping;
- 11 March 2021: discussion with all regulatory authorities in the framework of the SOGC Task Force;
- 16 March 2021: teleconference with all regulatory authorities and TSOs to discuss mapping;
- 17 March 2021: teleconference with all regulatory authorities and TSOs;
- 24 March 2021: teleconference with all regulatory authorities and TSOs to discuss mapping;
- 31 March 2021: teleconference with all regulatory authorities and TSOs;
- 15 April 2021: Oral hearing with all regulatory authorities and TSOs;
- 19 April 2021: Oral hearing with RTE and Terna;
- 20 April 2021: Oral hearing with CREG;

- 11 May 2019: discussion with all regulatory authorities at the Electricity Working Group meeting.

(6) The AEWG submitted its advice on 14 May 2021, endorsing the draft ACER Decision. The AEWG stated that the Decision was discussed extensively within the System Operation Coordination Group (SOCG) and that a final discussion took place at the 11 May AEWG meeting. The AEWG's advice also stated that no comments on the content were submitted during the meeting or submitted during the commenting phase.

### **3. THE AGENCY'S COMPETENCE TO DECIDE ON THE PROPOSAL FOR AMENDMENT**

(7) According to Article 7(4) of the SO Regulation, TSOs responsible for developing a proposal for terms and conditions or methodologies may propose amendments of these terms and conditions or methodologies, and those proposals for amendments shall be approved in accordance with the procedure set out in Articles 5 and 6 of the same Regulation.

(8) According to Article 6(2)(c) of the SO Regulation, proposals related to coordinating operational security analysis shall be subject to approval by ACER.

(9) According to Article 5(2)(b) of Regulation (EU) 2019/942, proposals for terms and conditions or methodologies, based on network codes and guidelines adopted before 4 July 2019 (i.e. the SO Regulation), which require the approval of all regulatory authorities, shall be submitted to ACER for revision and approval.

(10) Therefore, on the basis of those legal provisions, ACER is competent to adopt a decision on the proposed amendments of the CSAM submitted on 18 December 2020 by all TSOs to ACER for revision and approval.

### **4. SUMMARY OF THE PROPOSAL FOR AMENDMENT**

(11) The proposal for amendment includes the following elements:

- a. General additional recommendations to be included in CSAM's Recitals;
- b. Proposal for an additional definition to be added to Definitions and Interpretations
- c. Remedial action inclusion in individual grid models in Article 21;
- d. Rules for overlapping zones, cross-border relevant network elements ('XNEs') and cross-border relevant remedial actions ('XRAs') in Article 27;
- e. Rules for the remaining available margin of an overlapping XNE in Annex II.

(12) The proposal for amendment therefore consists of the following amendments of the CSAM previously approved by ACER:

- a. Addition of a paragraph to the Recitals referring to the establishment of regional coordination centres;
- b. Addition of a paragraph in Article 2 with a new definition on ‘Setpoint’;
- c. Addition of several paragraphs in Article 21 on inclusion of remedial actions in individual grid models;
- d. Addition of several paragraphs in Article 27 on overlapping zones, cross-border relevant network elements (‘XNEs’) and cross-border relevant remedial actions (‘XRAs’);
- e. Addition of an Annex II providing the rules for the remaining available margin on an overlapping XNE with the conservative approach.

## **5. SUMMARY OF THE OBSERVATIONS RECEIVED BY THE AGENCY**

### **5.1. Consultation of regulatory authorities and TSOs**

(13) ACER, in close cooperation and consultation with all regulatory authorities and TSOs as detailed in paragraph (5) above, and beyond the above-mentioned issues:

- a. discussed ACER’s suggestion to remove paragraph 5 of Article 21 because it does not seem to set out a clear rule;
- b. discussed editorial changes to paragraphs 7, 8, 9 and 10 of Article 21, aiming at improving clarity;
- c. clarified the details about the appointment of overlapping XNEs and overlapping XRAs;
- d. discussed the application of day-ahead and intra-day coordinated regional operational security assessment and the requirements to the conservative approach at CCR level, or a cross-regional process. ACER, regulatory authorities and TSOs also discussed and refined the differences in treatment of overlapping and non-overlapping XNEs at the cross-regional process;
- e. discussed and refined the solution of mapping the cross-regional process’ costs to overlapping XNEs, which includes the simulations and a mathematical formulation. ACER, regulatory authorities and TSOs also discussed and agreed on sharing of these costs among the involved CCRs; and
- f. discussed possible solutions of cross-regional process’ costs sharing within each CCR, and found the plausible solution suitable for all TSOs.

### **5.2. Hearing phase**

(14) ACER initiated the hearing phase on 7 April 2021 by providing all TSOs and regulatory authorities with a near final draft of Annex I to this Decision, as well as the reasoning for

the introduced changes to the proposed amendments. The hearing phase lasted until 21 April 2021. During this time, ACER organised an oral hearing on 15 April 2021 with regulatory authorities and TSOs and received written responses from BNetzA CREG, Terna, RTE and, PSE. Upon request, ACER also organised a joint oral hearing with Terna and RTE and an oral hearing with CREG.

- (15) The written submissions received provided amendments to the text for clarity, as well as covered the following topics:
- a. BNetzA demonstrated support for the CSAM revisions introduced by ACER; BNetzA suggested that the methodology for the identification of overlapping XNEs would have to be assessed/ evaluated sometime after the implementation (e.g. 24 months) in order to increase transparency and manage expectations.
  - b. PSE emphasised that the CSAM is a pan-European methodology and should be a source of requirements for regional methodologies and that reference to the provisions of the regional methodologies in accordance with article 76 of the SO Regulation (as in article 21(6) and, related to it, 21(4)) contradicts these assumptions and allows different approaches in individual CCRs. PSE stated that the proposed article 21(5) does not take into account TSOs using the central dispatching model and proposed amendments to this article. PSE added that Article 21 does not define if and how the injections and withdrawals shall be modified in subsequent IGMs in case of change in the market outcome (including integrated scheduling process) and that there is no clear way to proceed in a situation where a generating unit, which is used as an XRA, changes its operating point due to the market activities (which includes integrated scheduling process). Furthermore, PSE argued that it is necessary to ensure in the CSA process a distinction between TSOs internal congestions (non-cross-border relevant congestions) and congestions which have cross-border relevance, and that internal congestions should be solved before the regional optimisation.
  - c. CREG proposed two additional changes to the CSAM which were not discussed during the oral hearing because they did not fit the scope of the amendments discussed: the first suggested change was to remove Article 15(2) of the CSAM, which stipulates that the ROSC shall define the rules/criteria to establish XNEs which are eligible for cost sharing or not; the second suggested change proposed to refer to the provision of Article 75(6) of the SO Regulation in the CSAM, of Article 37 (forecast of intermittent generation) and of Article 38 (forecast of load) to provide a basis for ensuring compliance by TSOs on this point. On the changes proposed by CREG, ACER clarified that introducing these amendments would require proper discussion and consultation; nevertheless, ACER remains conscious of the issue and intends to request this amendment from TSOs at a suitable time.
  - d. RTE and TERNA jointly commented Article 27(6), namely regarding the conservative approach. RTE and TERNA explained that this should be

supported only for the intraday timeframe and not for the day-ahead timeframe, since this would add strong restrictions for optimising the XRAs, lead to unfeasible optimisation in certain cases and increase the related expenses. RTE and TERNA suggested the rewording of Article 27(6) with a goal to apply the current coordination mechanisms in the interim period (after the application of CROSAs and before the application of cross-regional process), where TSOs would be able to define limitations in neighbouring CCRs in order to limit the risks of residual congestions.

(16) During the oral hearing of 15 April 2021, participants discussed the points raised by RTE and TERNA, mainly regarding ACER's proposed revisions to Article 21(3) and Article 27(6), (9), (14) and (19):

- Regarding Article 21(3), participants discussed the possible deletion of this paragraph.
- Regarding Article 27(6), some participants mentioned that the conservative approach could be too constraining if applied also in the day-ahead timeframe, and discussed a compromise solution that, in that interim period (after the implementation of regional ROSCs and before the implementation of the cross-regional process), the currently applied processes of managing the residual congestions at day-ahead level can take place.
- Regarding Article 27(9), participants discussed the possibility to include the non-overlapping XNEs in the cross-regional process.
- Regarding Article 27(14), participants supported ACER's revisions regarding the need to assign the eventual portion of overload unresolved at the regional CROSA, to the native CCR.
- Regarding Article 27(19), on the basis of the previous discussions (also under paragraph (6)), participants suggested to shorten the implementation timeline to 6 months (instead of 18 months).

(17) During the oral hearing with Terna and RTE on 19 April 2021, participants discussed some of the same points that were covered in the oral hearing of 15 April, namely covering topics of concern regarding Article 27(6), and in particular regarding the conservative approach; RTE and Terna suggested that all TSOs and regulatory authorities agree on the target solution and reduce the interim period of time to reach this preferred solution.

(18) During the oral hearing with CREG on 20 April 2021, CREG raised a point that had not been discussed in the context of the discussions between ACER and regulatory authorities and TSOs. ACER clarified that this decision was about a scheduled amendment of the CSAM limited in scope to Articles 21 and 27 and that any other amendments to the CSAM within this process would require proper discussion and

consultation; nevertheless, ACER remains conscious of the issue and intends to request this amendment from TSOs at a suitable time.

## **6. ASSESSMENT OF THE PROPOSAL FOR AMENDMENT**

### **6.1. Legal framework**

- (19) Articles 5(1), 5(2) and 6(2)(c) of the SO Regulation require all TSOs to propose a methodology for coordinating operational security analysis in accordance with Article 75(1) of the SO Regulation for regulatory approval, and Article 7(4) of the same Regulation allows those TSOs to propose amendments to the approved methodology for regulatory approval.
- (20) Article 7 of the SO Regulation provides that the TSOs responsible for developing a proposal for terms and conditions or methodologies may propose amendments to regulatory authorities and ACER, and that proposals for amendment to the terms and conditions or methodologies shall be approved in accordance with the procedure set out in Articles 5 and 6 of the SO Regulation.
- (21) Article 4 of the SO Regulation lists the objectives and regulatory aspects which are relevant for this proposal for amendment.
- (22) Article 20 of the SO Regulation introduces remedial actions as a means to manage operational security violations. Remedial actions that will relieve operational security violations are part of the outcome of the coordinated operational security analysis.
- (23) Articles 21 and 22 of the SO Regulation set out the principles for activating and coordinating remedial actions, as well as the criteria for selecting the appropriate remedial actions and introduce categories for remedial actions. These principles, criteria and categories need to be respected during the coordinated operational security analysis.
- (24) Article 70 of the SO Regulation contains provisions for the development of the methodology for building day-ahead and intraday common grid models.
- (25) Article 76 of the SO Regulation lays down the requirements for the proposal for regional security coordination which will be established by TSOs of the different capacity calculation regions ('CCRs') after the approval of the Proposal.
- (26) Article 21 of the CSAM introduces the requirements for remedial actions inclusion in individual grid models; Article 21(6) provides that no later than eighteen months after the adoption of the CSAM all TSOs shall jointly develop a proposal for its amendment in accordance with Article 7(4) of the SO Regulation, and lays down the rules for the proposal to complement the CSAM.
- (27) Article 27 of the CSAM provides the rules for the overlapping zones, XNEs and XRAs; Article 27(3) provides that no later than eighteen months after the adoption of the CSAM,

all TSOs shall jointly develop a proposal for its amendment in accordance with Article 7(4) of the SO Regulation, and lays down the rules for the proposal to complement the CSAM.

- (28) As a general requirement, Article 6(6) of the SO Regulation requires that the proposal for terms and conditions or methodologies include a proposed timescale for their implementation and a description of their impact on the objectives of the same Regulation.

## **6.2. Assessment of the legal requirements**

### **6.2.1. Assessment of the requirements for the development and for the content of the proposal for amendment**

#### *6.2.1.1. Development of the proposal for amendment*

- (29) The Proposal fulfils the requirements of Articles 5(1), 5(2) and 6(2)(c) of the SO Regulation, as all TSOs jointly developed and submitted the agreed proposal for amendment to ACER for approval and revision. This is also in accordance with Article 5(2) of Regulation (EU) 2019/942.

- (30) The Proposal fulfils the requirements of Article 21 and 27 of the CSAM approved by ACER in June 2019, as the proposal for amendment, was submitted by all TSOs on 18 December 2020, which is within the eighteen months submission deadline.

- (31) The Proposal was subject to consultation as described in Section 2.1 above thereby fulfilling the requirements of Articles 7(4) and 11 of the SO Regulation.

#### *6.2.1.2. Required content of the proposal for amendment of Article 21*

- (32) The proposal for amendment fulfils the requirements of Article 21(6) of the CSAM approved by ACER in June 2019, as the proposal for amendment complements the methodology with rules on distinguishing between:

- a. up-to-date load and generation forecasts and network topology considered within the individual grid model which are not aiming at addressing expected operational security violations identified during the local preliminary assessment and are therefore not considered as remedial actions; and
- b. the expected generation and load, as well as, network topology considered within the individual grid model, which are aiming at addressing expected operational security violations identified during the local preliminary assessment and are therefore considered as remedial actions.

#### *6.2.1.3. Required content of the proposal for amendment of Article 27*

- (33) The proposal for amendment fulfils the requirements of Article 27(3) of the CSAM approved by ACER in June 2019, as it complements the methodology with:

- a. rules for the identification and definition of overlapping XNEs, overlapping zones and impacting CCRs;
  - b. rules for the identification of an impacting CCR and the competent RSC(s) that shall be responsible to first address operational security violations on overlapping XNEs at a regional level (so-called ‘native CCR’). ACER refined the proposal for amendment with details of appointing different overlapping XNEs to the native CCR, and rules for reassessment of this appointment. Shared responsibility was not incorporated in the CSAM amendment, but the entire responsibility for the addressing of operational security violations is appointed to a single (native) CCR;
  - c. rules for the identification of overlapping XRAs that may be used to address residual operational security violations;
- (34) The proposal for amendment partially fulfils the requirements of Article 27(3) of the CSAM approved by ACER in June 2019, as it complements the methodology with the principles and rules for consistent interaction between coordinated regional and cross-regional operational security assessments and the rules for the identification of the most economically efficient remedial actions to address residual operational security violations at cross-regional level. ACER revised these provisions by:
- a. further explaining the possibilities for the application of the conservative approach at regional level;
  - b. introducing regular interactions among the CCRs in the interim period before the implementation of cross regional process; and
  - c. narrowing the application of cross-regional process solely to the overlapping XNEs.
- (35) The proposal for amendment partially fulfils the requirements of Article 27(3) of the CSAM approved by ACER in June 2019, as it complements the CSAM with the rules for the sharing of costs of the overlapping XRAs activated to address the residual operational security violations by assigning the shares of costs to individual overlapping XNEs and to individual impacting CCRs. In cooperation with the regulatory authorities and TSOs, the methodology for mapping the cross-regional costs to the overlapping XNEs has been defined in a form suitable for the cross-regional process. Also the rules for sharing the cross-regional costs among CCRs and within each CCR are detailed and refined in Article 27, at paragraphs (13) – (17).
- 6.2.1.4. Proposed timescale for implementation*
- (36) The proposal for amendment does not contain specific timelines for implementation though the CSAM approved by ACER in June 2019 does so in Articles 46(2) and 46(8). Therefore, in the absence of any specific timescale for implementation in the proposal for amendment, ACER considers it appropriate that the timelines for implementation similar to the ones for the CSAM approved by ACER in June 2019 apply.

- (37) However, for the implementation of Articles 27 of the proposal for amendment and Article 30 of the CSAM approved by ACER in June 2019 a different timeline is required, in accordance with Article 46(8) of the CSAM approved by ACER in June 2019. In cooperation with regulatory authorities and TSOs, it has been agreed to implement the requirements of Articles 27 and 30 among CCRs with mutual impact, 18 months after the last CCR applies the Regional Operational Security Coordination pursuant to Article 76 of the SO Regulation. The shorter timescale has been discussed as well, however after further discussions and considerations, ACER proposed to leave the originally envisaged implementation time of 18 months. Although TSOs announce readiness for a shorter implementation timeline, ACER is of the opinion that a short timeline for the cross-regional process implementation would inevitably lead to starting the preparation of cross-regional implementation already in parallel with the final phase of regional ROSC implementation. Such parallelism might interfere and slow down the regional ROSC preparation, which is highly undesirable. Due to the formulation, which allows the implementation for “not later than 18 months”, if there were such conditions, TSOs might apply the cross-regional earlier.

#### *6.2.1.5. Expected impact of the methodology*

- (38) The proposal for amendment provides an explanation of the proposed changes to Articles 21 and 27 in its explanatory note; no further recitals were included by TSOs in the proposal for amendment. ACER considers that all the relevant objectives of the SO Regulation have already been addressed in the recitals of the CSAM approved by ACER in June 2019, and since the proposal for amendments does not alter or impact the fulfilment of these objectives, ACER considers that no further additions to the existing recitals of the CSAM approved by ACER in June 2019 would be necessary.

### **6.3. ACER revisions of the proposal for amendment with regard to Article 21**

- (39) Paragraph 4 of Article 21 of the proposal for amendment details that it is possible to include some XRAs in the initial Day-Ahead IGM after local preliminary assessment, but XRAs can be included to subsequent IGMs only if agreed upon through a coordinated process in accordance with paragraph 6 of Article 21 of the proposal for amendment.
- (40) Paragraph 3 of Article 21 of the proposal for amendment deals with a local preliminary assessment; however, it fails to provide clear rules for the implementation and speaks only of unrestricted possibilities available to TSOs. Upon the agreement with the TSOs and regulatory authorities, ACER chose to remove this paragraph.
- (41) In paragraph 5 of Article 21 of the proposal for amendment, a clear reference to the latest market schedules and Load/RES forecasts is provided as a basis to determine injections and withdrawals. Any deviations from these latest assumptions inserted by TSOs in their IGMs will be considered and tracked as ‘remedial actions’. While not changing the meaning of the TSOs’ proposal for amendment, ACER clarified in the second sentence of the provision that it is the TSOs that need to determine the injections and withdrawals based on the latest market schedules and forecasts or schedules from the integrated scheduling process. This is to take into account the cases where integrated scheduling

processes exist, and in this regard, ACER also removed the reference to ROSC methodologies.

- (42) Also, concerning the preparation of the individual grid models in the day-ahead timeframe, as set out in paragraph 6 of Article 21 of the proposal for amendment, ACER removed the reference to the ROSC methodologies developed in accordance with Article 76(1) of the SO Regulation because the CSAM is a source of requirements for regional methodologies and not the other way around.
- (43) Regarding the network topology considered within the first day-ahead individual grid models, no distinction is made between forecast and remedial action for the status or set point of network elements. Such a remedial action can only be determined when a clear reference status is defined based on external parameters and in particular after the merging of the individual grid models. This is prescribed in paragraph 7 of Article 21 of the proposal for amendment.
- (44) ACER improved the readability of paragraph 6 of Article 21 of the proposal for amendment without changing the meaning. This paragraph details that all subsequent individual grid models in the day-ahead and intraday timeframes shall modify or include new XRAs, compared to the previous IGMs, on topology, setpoints, injections or withdrawals, only if:
- a. these XRAs are agreed upon in the latest ROSC according to the methodology pursuant to Article 76 of the SO Regulation; or
  - b. the change is related to the XRAs, which they are no longer technically available.

#### **6.4. ACER revisions of the proposal for amendment with regard to Article 27**

##### **6.4.1. Appointment of overlapping XNEs and overlapping XRAs**

- (45) In paragraph 2 of Article 27, ACER explicitly defined how the different types of XNEs are treated regarding the appointment to a native CCR, where the congestions are resolved first, at regional level. The solution for the eventual revision of such appointment has also been defined.
- (46) In paragraph 5 of Article 27, on the basis of the proposal of the German regulatory authority, in agreement with all regulatory authorities and TSOs, the obligation to reassess the methodology and the list of overlapping XNEs and overlapping XRAs has been defined.

##### **6.4.2. Coordinated regional operational security assessment and cross-regional coordination process**

- (47) ACER amended the proposal for amendment on the application of CROSA at day-ahead level, by adding in paragraph 6 the possibility that a conservative approach can be applied in the interim period before the application of cross-regional process, in case that a

connecting TSO of an overlapping XNE faces severe residual congestions or excessive redispatching costs.

- (48) ACER re-shaped the previous Annex 2 from the proposal for amendment into a new paragraph 8, explaining the principles of the conservative approach. In this paragraph, the term “remaining available margin” has been replaced with “remaining margin” of an actually available capacity of an XNE up to its maximum flow.
- (49) In paragraph 9, ACER changed the proposal for amendment by defining the cross-regional process solely focused on overlapping XNEs, without the inclusion of non-overlapping XNEs. ACER’s position on overloads at non-overlapping XNEs is that they should be left for the subsequent regional CROSAs. High residual overloads can be expected only at overlapping XNEs, other overloads are expected to be small since they would be related to modelling inconsistencies, non-linearity or similar causes. An important reason for this position is that the cross-regional process should be limited to the overlapping area, with minimal number of XNEs (i.e. overlapping XNEs only) and thus the minimal processing time. This is expected to shorten the time of the whole cross-regional process and to facilitate its inclusion in the operational planning sequence.
- (50) In paragraph 11, ACER re-ordered the priority of criteria of the cross-regional process. The main criteria is the removal of overloads without creating new overloads, after the redispatching costs minimisation, and only then the request to minimally alter the results of regional CROSAs.

#### 6.4.3. Sharing of cross-regional coordination costs among CCRs

- (51) During ACER’s extensive discussions with TSOs and regulatory authorities, the methodology of mapping the cross-regional process costs to the overlapping XNEs has been elaborated. The principles of this methodology follow the pattern of similar methodology applied in the ROSC methodologies for CCR Core and CCR of South East Europe, with the additional recognition of shifting the congestions by the linear non-costly remedial actions, such as phase shifting transformers and HVDC lines. The mapping methodology is provided in the Appendix of Article 27.
- (52) ACER improved the description and readability of the cost sharing principles of cross-regional costs among the CCRs, by adding the mathematical formulation in paragraph 14, which has been analysed and verified through the examples.
- (53) In paragraph 15:
- a. according to the proposal by the Slovenian TSO and in agreement with all TSOs and national regulatory authorities, the previously defined threshold of 5% for the inclusion of overlapping XRAs in the cost sharing has been removed;

- b. the additional details have been added on treatment of situations of inconsistent inclusion of agreed XRAs in the subsequent common grid model used for the cross-regional process and related cost sharing.

#### 6.4.4. Sharing of cross-regional coordination costs within each CCR

- (54) After the extensive discussion during the common proceedings, mainly between ACER and the TSOs of Austria, France, Italy and Slovenia, in agreement with all regulatory authorities and TSOs, the solution for the sharing of cross-regional process' costs among the TSOs of each CCR has been defined. ACER facilitated the discussion and the final solution in which the XRAs applied at the regional CROSAs are considered as the causers of residual congestions at overlapping XNEs. The cost sharing process first addresses the costs to the XNEs originally overloaded at the regional processes, after which the costs are shared according to the regional cost sharing methodologies.

## 7. **CONCLUSION**

- (55) For all the above reasons, ACER considers that the proposal for amendment is in line with the requirements of the SO Regulation, provided that the revisions described in this Decision are integrated in the proposal for amendment, as presented in Annex I. The revisions ensure that the proposal for amendment is in line with the purpose of the SO Regulation and contributes to market integration, non-discrimination, effective competition and the proper functioning of the market. They also implement editorial adjustments.
- (56) Therefore, ACER approves the proposal for amendment subject to the necessary revisions. To provide clarity, Annex I to this Decision sets out the Proposal as revised and approved by ACER,

HAS ADOPTED THIS DECISION:

### *Article 1*

The amendment of the methodology for coordinating operational security analysis according to Article 75 of Commission Regulation (EU) 2017/1485, approved by ACER Decision No 07/2019 of 19 June 2019, is approved as set out in Annex I to this Decision.

### *Article 2*

This Decision is addressed to the following TSOs:

APG - Austrian Power Grid AG  
VUEN - Vorarlberger Übertragungsnetz GmbH  
Elia - Elia Transmission Belgium SA/NV  
ESO - Electroenergien Sistemen Operator EAD  
HOPS - Croatian Transmission System Operator Ltd  
ČEPS - ČEPS a.s.  
Energinet – Energinet  
Elering – Elering AS  
Fingrid – Fingrid Oyj  
Kraftnät Åland - Kraftnät Åland Ab  
RTE - Réseau de Transport d'Electricité, S.A  
Amprion - Amprion GmbH  
TransnetBW - TransnetBW GmbH  
TenneT GER - TenneT TSO GmbH  
50Hertz - 50Hertz Transmission GmbH  
Independent Power Transmission Operator S.A. ("IPTO" or "ADMIE")  
MAVIR Magyar Villamosenergia-ipari Átviteli Rendszerirányító Zártkörűen Működő  
Részvénytársaság  
EirGrid - EirGrid plc  
Terna - Terna Rete Elettrica Nazionale S.p.A.  
Augstsprieguma tīkls - AS Augstsprieguma tīkls  
LITGRID - Litgrid AB  
Creos Luxembourg S.A.  
TenneT TSO - TenneT TSO B.V.  
PSE - Polskie Sieci Elektroenergetyczne S.A.  
REN - Rede Eléctrica Nacional, S.A.  
Transelectrica - National Power Grid Company Transelectrica S.A.  
SEPS - Slovenská elektrizačná prenosová sústava, a.s.  
ELES - ELES, d.o.o. Sistemski operater prenosnega elektroenergetskega omrežja  
REE - Red Eléctrica de España S.A.  
Svenska Kraftnät - Affärsverket svenska kraftnät  
SONI - System Operator for Northern Ireland Ltd

Done at Ljubljana, on 14 June 2021.

**- SIGNED -**

*For the Agency  
The Director*

C. ZINGLERSEN

Annexes:

Annex I – Amendment of the methodology for coordinating operational security analysis

Annex Ia (for information only) – Amendment of the methodology for coordinating operational security analysis with track-changes

*In accordance with Article 28 of Regulation (EU) 2019/942, the addressees may appeal against this Decision by filing an appeal, together with the statement of grounds, in writing at the Board of Appeal of the Agency within two months of the day of notification of this Decision.*

*In accordance with Article 29 of Regulation (EU) 2019/942, the addressees may bring an action for the annulment before the Court of Justice only after the exhaustion of the appeal procedure referred to in Article 28 of that Regulation.*