

Public consultation on the amendment to the Core Long Term Capacity Calculation Methodology

Fields marked with * are mandatory.

Introduction

Transmission System Operators from the Core Capacity Calculation Region (Core TSOs) proposed the amendment to the Long Term Capacity Calculation Methodology of the Core Capacity Calculation Region (Core LT CCM) in accordance with Article 10 of Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline on forward capacity allocation as modified by Commission Implementing Regulation (EU) 2021/280 of 22 February 2021 (FCA Regulation).

Pursuant to Article 4(7) of the FCA Regulation, the Core TSOs submitted the proposed amendment (the Proposal) to the National Regulatory Authorities from the Core Capacity Calculation Region (Core NRAs) for approval. Article 4(9) of the FCA Regulation requires Core NRAs to consult, closely cooperate and coordinate with each other in order to reach an agreement and make a decision within six months following receipt of submission of the Proposal to the last Core NRA.

Article 4(10) of the FCA Regulation states that where the regulatory authorities have not been able to reach an agreement within the six-month period, or upon their joint request, ACER shall adopt a decision concerning the submitted within six months, in accordance with Article 5(3) and the second subparagraph of Article 6(10) of Regulation (EU) 2019/942.

Since Core NRAs couldn't reach an agreement on the the Proposal, they submitted it to ACER on 4 February 2026.

ACER has six months to decide on the Proposal i.e. by 4 August 2026.

The current methodology was approved in [March 2023](#).

To inform its decision-making process, ACER is collecting inputs from stakeholders. This consultation is addressed to all interested stakeholders in the EU, including regulatory authorities, market participants and transmission system operators.

Interested stakeholders are invited to respond to this survey by **27 March 2026, 23:59 hrs (CET)**.

Data protection

ACER will process personal data of the respondents in accordance with [Regulation \(EU\) 2018/1725](#), taking into account that this processing is necessary for performing ACER's consultation tasks.

More information on data protection is available in ACER's [data protection notice](#) and on [ACER's website](#).

ACER will not publish personal data.

Confidentiality

Following this consultation, ACER will make public:

- the number of responses received;
- company names, unless they should be considered as confidential;
- all non-confidential responses; and
- ACER's evaluation of responses. In the evaluation, ACER may link responses to specific respondents or groups of respondents.

You may request that the name of your company or any information provided in your response is treated as confidential. To this aim, you need to explicitly indicate whether your response contains confidential information.

You will be asked this question at the end of the survey.

I have read the information provided in this section.

Respondent's data

*Country

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark

- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- Other**

* Name and surname

This information will not be published.

50 character(s) maximum

Thomas LEOPOLD

* Company

50 character(s) maximum

Union Française de l'Electricité

* Email

This information will not be published.

thomas.leopold@ufe-electricite.fr

Related documents

Core TSOs' proposal of the amendment to the Core LT CCM:

- [Core LT CCM amendment proposal](#)
- [Core LT CCM amendment proposal in track change version in comparison to the current Core LT CCM](#)
- [Core TSO s' explanatory note to the Core LT CCM amendment proposal](#)

Related legal acts:

[ACER Decision 03/2023](#) of 18 January 2023 on the long-term capacity calculation methodology of the Core capacity calculation region and its [Annex I](#) (version of Core LT CCM currently in force)

[FCA Regulation](#) - Commission Regulation (EU) 2016/1719 of 26 September 2016 establishing a guideline on forward capacity allocation as modified by Commission Implementing Regulation (EU) 2021/280 of 22 February 2021 (FCA Regulation).

[ACER Regulation](#) - Regulation (EU) 2019/942 establishing a European Union Agency for the Cooperation of Energy Regulators

The Core LT CCM amendment proposal

The Core TSOs submitted the proposal for amending the Core LT CCM with the following main amendments:

- **Introduction of Available Transfer Capacity benchmark (ATC benchmark) to the long term capacity calculation process.**

This measure will enable the reshaping of the flow-based domain in order to accommodate historical benchmark values. It is foreseen as a transitional and effective solution to ensure that sufficient capacities are offered for long-term flow-based allocation. The application of the ATC benchmark shall ensure that the long-term flow-based domain remains proportionate to historically allocated long-term capacities.

Core TSOs will input the ATC benchmark values into the central tool used for the long-term capacity calculation process. The central tool will apply the ATC benchmark after the pre-solving of the final merged long-term domain. The Remaining Available Margin (RAM) of each pre-solved CNEC of the final long-term domain will be adjusted based on the calculated induced flow resulting from the ATC benchmark. This adjustment will lead to a flow-based domain that provides allocation opportunities comparable to the benchmark values.

The final flow-based domain will then serve as input to the long-term flow-based allocation process. The allocation process itself is outside the scope of the Core LT CCM.

The benchmark values for both yearly and monthly capacity calculations to be used at go-live are set out in Annex 1 of the Proposal for the Amendment to the Core LT CCM*.

- **The integration of the Single Electricity Market of Ireland and Northern Ireland (SEM) - France bidding zone border into the Core LT CCM once Celtic interconnector commissioning is finalized.**

The proposed amendments aim to enable the integration of the SEM–France bidding zone border into the Core LT CCM following the commissioning of the Celtic Interconnector and once the technical conditions allow the commencement of long-term commercial operations.

*** Annex 1 to the Proposal for the Amendment of the Core LT CCM.**

Annex 1 describes the 2025 ATC benchmark values to be used as inputs to the long-term capacity calculation process. These values shall apply as of the 2027 yearly and monthly capacity calculation and may be revised annually by the Core TSOs, subject to approval through an amendment of the Core LT CCM.

A splitting factor of 1.25 is applied to the yearly ATC benchmark values presented in the table in Annex 1.

The benchmark values are defined as follows:

- They are based on the historically offered yearly and monthly capacities in 2025.
- For the DE–AT border (in both directions), the benchmarks are set at 50% of the 2025 historical ATC values, taking into account that the historical long-term allocations were the result of a bilateral agreement.
- For the HR–SI border (direction from Slovenia to Croatia), the benchmark values are set at 500 MW for yearly calculations and 150 MW for monthly calculations.
- ATC benchmark values for all Polish borders are set at zero, reflecting the historical absence of offered long-term cross-zonal capacities on these borders.
- Benchmark values for the SEM–FR bidding zone border will be determined closer to the commissioning date of the Celtic Interconnector.

Consultation topics and questions

Do you have any comments regarding the proposal for the introduction of the adjusted historic ATC benchmark to the long-term flow-based capacity calculation process?

- Yes
 No

Please explain.

2000 character(s) maximum

UFE has already expressed reservations regarding the implementation of the Long-term flow based. In particular, it has not been demonstrated that flow based capacity calculation and allocation would lead to higher economic efficiency as requested by FCA nor to an increase in cross zonal capacities made available to the market. According to some TSO simulations, certain bidding zones could see very low (even zero) volumes allocated on their borders.

The current amendment proposal seeks to tackle the calculation issue by ensuring a minimum level of capacity on the different borders during the LT FB capacity calculation. UFE therefore welcomes, as a first step, the proposal to include a minimum ATC benchmark as a constraint for the calculation of the FB domain of LT capacities for both the yearly and the monthly capacity calculation. Thus, historical yearly and monthly ATCs would serve as the basis for the RAM to ensure that the result of the capacity calculation accommodates the historical benchmark.

The process described in Article 14(7) is unnecessarily complex. Setting $\text{maxATC} = \text{minATC}$, leads to have RAM systematically equal to the induced flow before validation. It would have been simpler in Article 14(7) to set directly RAM at this specific value. If the current proposal is maintained, the calculation process will systematically lead to Flow Based domains that are similar to a single historical benchmark. However, the result of the allocation may be well above or below the historical value, depending on market conditions.

UFE notes that this proposal does not constitute an assurance that some borders would not see low if any allocated capacities. UFE would be in favor of investigating the possibility of a minATC at the allocation stage. UFE considers that the effects of the RAM adjustment should be monitored, in comparison with the levels of RAM computed initially. This monitoring should also encompass actual levels of capacity allocated at each border.

Do you have any comments or concerns regarding the way in which the historic long-term ATC benchmarks are determined?

- Yes
 No

Please explain.

2000 character(s) maximum

Article 10a and Annex I define the year 2025 as the reference for calculating yearly and monthly (with the 2025 seasonal average of historic monthly ATC) Benchmark ATC values. The choice of the year 2025 as a reference is not explained in the explanatory document. The rationale behind this choice should be detailed. Indeed, from a theoretical standpoint, a single year seems too restrictive to be representative.

Furthermore, the historical benchmark should not result in locking in outdated capacity values, nor preventing the market from benefiting from improvement in the network conditions. Therefore, UFE welcomes the benchmark review process expected to be carried by the TSOs 18 months after the go-live of LTFBA at the latest. Thus, any improvement in the network can be included in that process, and the benchmark values could be modified accordingly.

Finally, without the methodology for updating the ATC benchmark values, it is very difficult to provide an appropriate answer regarding their determination. UFE therefore requests full transparency of input data, assumptions, and resulting benchmark values, as well as regular reviews to ensure alignment with evolving system conditions.

How do you consider this approach for Polish borders where no capacity was allocated in long-term timeframe in the past?

- Yes
- No

Please explain.

2000 character(s) maximum

Do you have any comments or concerns regarding the integration of the Ireland - France bidding zone border into the Core LT CCM once Celtic interconnector commissioning is finalized?

- Yes
- No

Please explain.

2000 character(s) maximum

The proposal foresees that EirGrid and RTE will determine the benchmark value. UFE can support such an approach if it is confirmed that this new border won't interact with other existing borders. Otherwise, there should be a broader coordination on the determination of this benchmark value.

Do you have any other comments or concerns related to the Proposal for the amendment to the Core LT CCM?

- Yes
- No

Please explain.

2000 character(s) maximum

UFE regrets that the ENTSO-E proposal in 2025 to include an ATC extraction at the end of the LT capacity calculation process was abandoned. Such an approach should have been considered at least as a temporary measure, until comprehensive investigations were carried out and acceptable solutions to the collateral and the capacity issues were found and implemented.

Beyond the doubts already expressed regarding the added value of the flow based approach for long term horizons, flow-based allocation has inherently negative effects on collaterals, increasing them to a level disproportionate to the risk exposure of TSOs. Indeed, whereas ATC auctions were historically organized on a border-by-border basis, collateral requirements increase under the LTFBA due to the simultaneous allocation of all borders.

A collateral cap based on exogenous reference prices (SDAC and forward prices) was therefore implemented in order to cap the maximum payment obligation. UFE points out that this approach is overly conservative and can lead to an over or underestimation of the market clearing price, notably by filtering out bids that would be sustainable at the actual clearing price of the auction.

UFE understands that a proof of concept (PoC), based on a methodology relying on clearing prices effectively observed during the auction, has been developed by N SIDE. UFE regrets that this evolution, which shows positive results regarding all investigated KPIs, is conducted outside the scope of the LTFBA and will not be available at the go live scheduled for November 2026.

Confidentiality question

Does your response contain confidential information?

- Yes
 No

If your response contains confidential information, you have to claim confidentiality according to Article 9 of AC ER's Rules of Procedure.

How to do it:

1. download a PDF version of your response (see upper right corner of the page);
2. redact confidential information and provide descriptions* of the deleted information (e.g. use a PDF editor or print out your response and manually replace confidential information with descriptions);
3. upload the redacted (i.e. non-confidential) version of your response;
4. upload a separate document where you:
 - clearly identify which persons/undertakings should not have access to the deleted information;
 - provide reasons why the persons/undertakings should not have access to the information;

* Your descriptions of the deleted information must enable any party concerned with access to the file to determine whether:

- the information deleted is likely to be relevant to their defence; and
- there are sufficient grounds to request ACER to grant access to the information claimed to be confidential.

I have read the information provided in this section and Article 9 of [ACER's Rules of Procedure](#).

Contact

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