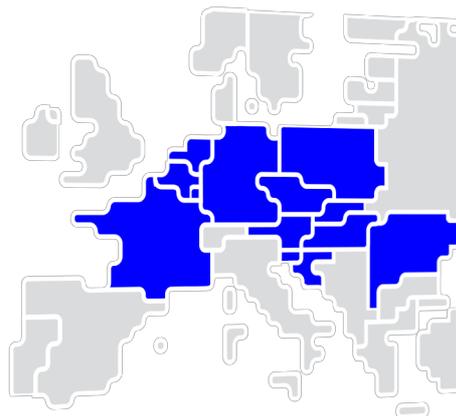




Consultation Report on Common methodology for coordinated redispatching and countertrading for the Core CCR in accordance with Article 35(1) of Commission Regulation (EU) 2015/1222 of 24 July 2015

22 February 2019



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GLOSSARY

All definitions and abbreviations of the Core RD and CT Methodology apply accordingly.

1. INTRODUCTION

This document is the consultation report for the Core TSOs proposal for the methodology for coordinated redispatching and countertrading (Core RD and CT Methodology). The Core RD and CT Methodology is required by Article 35(1) of Commission Regulation (EU) 2015/1222 establishing a guideline on capacity allocation and congestion management (CACM Regulation).

Core TSOs would like to thank all parties involved in the public consultation for their interest in the Core RD and CT Methodology Proposal. Core TSOs welcome the feedback received as it is valuable for the further development and detailing of the Core RD and CT Methodology.

1.1. Public consultation on Core RD and CT Methodology

Via the ENTSO-E Consultation Platform, the public consultation document for the Core RD and CT Methodology was available to Core stakeholders from the 5th of September 2018 until the 5th of October 2018. In total, 10 stakeholders submitted their responses.

Since the public consultation results should be processed in an anonymized manner, the identity of the respondents is not disclosed in this consultation report. Please note that all responses were, however, shared with the Core National Regulatory Authorities (NRAs) in a non-anonymised manner.

Main views and recurring comments have been summarized in this report. The Core TSOs wish to clarify that the content of this document is intended to summarize the results obtained in the public consultation. The Core TSOs did their best to reply to all comments and concerns.

2. CORE TSOS PROPOSAL FOR THE METHODOLOGY FOR COORDINATED REDISPATCHING AND COUNTERTRADING – CONSULTATION FEEDBACK

2.1. Introduction

In this chapter, a summary is provided of all stakeholder responses received via the ENTSO-E Consultation Platform (an overview of the survey questions can be found in the Appendix). All responses are structured in a table showing the stakeholder response, the number of stakeholders asking for a specific adaptation, the action taken by Core TSOs and in addition a Core TSOs answer to the stakeholders' response.

2.2. General

Some specific feedback was received on the following:

	Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	Stakeholders ask for a more market-oriented redispatching approach or ask for general price-related redispatching.	2	See answer	In the Article 35(5) of CACM guideline the revenues for RD and CT can either be price-based (market) or cost-based. The rules for pricing of the RD CT resources are based on the national legal and regulatory frameworks. An alignment of the pricing rules in CCR region is not a task of the TSOs and will not be considered in this methodology.
2	One stakeholder asks for the consideration of important aspects for the integration of Renewable Energy Systems (RES) in national regulation as a resource for redispatching.	1	See answer	The use of Renewable Energy resources for Redispatching has to follow the present national legal and regulatory framework and further details will be considered in the methodology pursuant to Article 76(1) of SO guideline.
3	Stakeholders have concerns regarding the use of countertrading and ask for clear definition (including the exact rules and limits) of the TSOs access to the intraday market.	2	See answer	Countertrading is in general a possible RA. The application of these measures depends on the optimization principle and will be described in the methodology pursuant to Article 76(1) of SO guideline. Countertrading possibilities depend on the several national and regulatory frameworks.

4	One stakeholder asks for separate consideration of the instruments of redispatching, countertrading and balancing.	1	See answer	<p>The use of the RD and CT resources is based on the national legal and regulatory frameworks.</p> <p>A more detailed description on how balancing markets are used as a resource for countertrading on a national level is provided in the Explanatory Note.</p>
5	One stakeholder asks for clarification that no cross-border capacity should be reserved for redispatching purposes.	1	See answer	For Redispatching purposes there will be no reservation of cross-border capacities. Together with the activation of the RD and CT Measures, the cross-border capacities have to be modified in order to avoid that market trades go in the opposite direction than the RD and CT Measures.
6	Stakeholders ask for independent implementation of the CACM 35 methodology and fear a large delay for the implementation of the proposed common coordination methodology. They propose a stepwise application.	2	See answer	<p>Continuous improvement of RD and CT is a daily task of the TSOs.</p> <p>TSOs see strong dependencies with other methodologies, especially in the methodology pursuant to Article 74(1) of CACM guideline and the methodology pursuant to Article 76(1) of SO guideline where the cost sharing and the consideration of non-costly and costly remedial actions will be described. The Core RD and CT Methodology covers only costly RA and is an input for the methodologies pursuant to Article 74(1) of CACM guideline and to Article 76(1) of SO guideline. Therefore RD and CT cannot be implemented separately.</p> <p>An optimization of RD and CT is only possible with cost sharing.</p>
7	Stakeholders ask for consideration of third parties, especially to reflect the physical inter-linkage between third parties and Core Member States.	2	See answer	Core TSOs understand the concerns raised and will contact the third parties on the further development and detailing of the Core RD and CT.
8	One stakeholder asks for a factual document explaining	1	Update of the	Core TSOs have added an overview of the present RD and CT schemes in the

	how redispatching and/or countertrading are currently performed in each country of the Core region.		respective Article / Explanatory Note	Core region in the explanatory note.
9	Stakeholders of non-Core countries ask for active involvement in the development of the Core RD and CT methodology.	2	See answer	Core TSOs understand the concerns raised by these stakeholders and will actively inform the non-Core TSOs on the further development and detailing of the Core RD and CT methodology.

2.3. Methodology

Feedback on Article 1 – Subject matter and scope

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer	
1	One stakeholder expresses its concerns about the use of countertrading in cross-border congestion management. In its view, when performing countertrading, TSOs become active market participants, which should be avoided. The stakeholder suggests that for congestion management, redispatching is more appropriate as it seems to be more effective and it does not have any impact on the market (prices).	1	See answer	As described in the Core RD and CT Methodology, several possibilities of CT exist and depend on national regulatory framework. The Core RD and CT Methodology requires to define a methodology for both Redispatching and Countertrading. It will be up to the methodology required pursuant to Article 76(1) of SO guideline to define what measures are the most effective to relieve a given congestion under consideration of Redispatching, Countertrading and non-costly remedial actions. The uncertainties regarding effectiveness and location of Countertrading will be considered in the methodology pursuant to Article 76(1) of SO guideline.

Feedback on Article 2 – Definitions and interpretation

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer	
1	Stakeholders ask to adjust the definition of "Redispatching" to make clear that the counterpart (balancing) of redispatching	4	See answer	The definition of "Redispatching" combined with the definition of "RD and CT Measure" meet already the criteria asked by the stakeholder. The existing definitions include all possibilities

	can also be countertrading and that redispatching is only performed by a single asset.			needed, including the possibility to perform RD and/or CT in different bidding zones. For each timestamp where RD and CT Measures are included in the grid model, the sum has to be energy-balanced. It can be composed of Countertrading only, Redispatching only, or a mix of both.
2	In the context of ordered redispatching, one stakeholder asks which amount of redispatching / countertrading has to be provided by the connecting TSO, how parameters will be set and if there will be reporting.	1	See answer	Every TSO has to provide full information about the Redispatching potential. The amount of Redispatching to be shared is to be decided by each TSO. Every TSO is responsible for the security of its own grid, therefore the decision on which resources are shared for the optimisation at which time shall be made by the TSO. The terms and conditions will be described in the methodology pursuant to Article 76(1) of SO guideline). Reporting is done according to the Core RD and CT Methodology.
3	One stakeholder asks in context of the definition of remedial actions not to use preventive remedial actions in D-1 timeframe in order not to significantly modify market results and hinder proper signals for investments.	1	See answer	Generally, RD and CT are done after day-ahead market results are known. The Core RD and CT Methodology at the moment only deals with Redispatching after Day Ahead Market Closure. For clarification: The Day Ahead Congestion Forecast is done at D-1 in the evening before D. Redispatching before D-1 market closure is only needed if very long lead times of generators force the TSO to activate Redispatching earlier.
4	One stakeholder asks - in context of the available redispatching potential - that the securisation of power plants should be also taken into account (not only the provision of ancillary services).	1	See answer	As the meaning of the feedback is not clear, Core TSOs are not able to take it into account.
5	One stakeholder asks to compare RD and CT	1	See answer	It is up to the methodology pursuant to Article 76(1) of SO guideline to define

	resources on an equal footing to identify the most effective and economically efficient combination of RAs and to update the definition of redispatching accordingly.			the most effective RAs. The uncertainties (effectivity, location) regarding countertrading will be considered in the methodology pursuant to Article 76(1) of SO guideline.
6	One stakeholder asks to include a transparency article that defines a data frame that will be publicly accessible.	1	See answer	The Core RD and CT Methodology follows the transparency regulation & REMIT.
7	One stakeholder asks to amend the definition of Countertrading, in order to make clear that CT is done in different bidding zones.	1	See answer	In case of combination of RD and CT, the CT can be activated in one bidding zone only and the RD will be activated in another bidding zone. See also definition of RD and CT Measure of Core RD and CT Methodology.

Feedback on Article 3 – Cross-border relevance of Redispatching and Countertrading

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1 One stakeholder asks to clarify the notion of 'cross-border impact' in the methodology.	1	Update of the respective Article / Explanatory Note	The definition of cross-border impacting is defined in the methodology pursuant to Article 75(1) of SO guideline and will be further described in the methodology pursuant to Article 76(1) of SO guideline. Examples are given in the Explanatory note to clarify the difference between cross-border impact and cross-border relevance.
2 Two stakeholders ask that the threshold determining TSOs coordination is set as low as possible because every remedial action should be coordinated.	2	Update of the respective Article / Explanatory Note	The definition of cross-border impacting is defined in the methodology pursuant Article 75(1) of SO guideline and will be further described in the methodology pursuant to Article 76(1) of SO guideline. In the methodology pursuant to Article 75(1) of SO guideline the threshold is defined with 5%, taking into account the thermal limit of the network element. The methodology pursuant to

				Article 76(1) of SO guideline is under development amongst Core TSOs.
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Feedback on Article 4 – Resources for Redispatching

	Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	One stakeholder asks to define the term 'best up-to-date information' more precisely, especially in the context of RES integration in RD & CT.	1	Update of the respective Article / Explanatory Note	The updated Core RD and CT Methodology no longer includes this term.
2	Stakeholders ask to distinguish resources like: <ul style="list-style-type: none"> - Resources subject to priority dispatch, if any; - Resources operated "in the market" and selected according to their merit order; - Resources operating outside the market 	2	See answer	The information about the possibilities for RD is defined in the Core RD and CT Methodology. In the methodology pursuant to Article 76(1) of SO guideline the overall optimization will be defined and here also side conditions or/and constraints (e.g. curtailment of wind and technical constraints) can be considered (see also explanatory note).
3	One stakeholder comments that all capacities in the market should be in principle eligible to be selected for RD actions (not only relevant ones). If a coordination via RSCs is needed the information should be the same for the RSCs.	1	Update of the respective Article / Explanatory Note	The updated Article no longer includes the term "relevant". The information about the possibilities will be the same for RSCs. Nevertheless in the overall optimization (defined in the methodology pursuant to Article 76(1) of SO guideline) also side conditions or/and constraints (e.g. curtailment of wind and technical constraints) can be considered as foreseen by national legislation (see also explanatory note).

Feedback on Article 5 – Resources for Countertrading

	Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	Stakeholders request to give a definitive list of TSOs resources for countertrading.	3	Update of the respective Article / Explanatory Note	Core TSOs updated the Core RD and CT Methodology and detail the conditions for adding new resources
2	Stakeholders request full transparency with regard to the TSOs access to the Intraday market.	4	See answer	Core TSOs agree with the request of full transparency with regard to their access to the intraday market. In particular, as stated in the respective Article of the Core RD and CT Methodology , Core TSOs Countertrading and Redispatching actions will be reported as described in the Transparency Regulation and in the Commission Regulation (EC) 543/2013 and 1227/2011 for Energy Market Integrity and Transparency.
3	Stakeholders oppose to the use of the balancing market as a resource for countertrading.	3	See answer	<p>Core TSOs do not agree to refrain from the use of the balancing market as a resource for Countertrading. One of the main reasons for this is that some Core TSOs already use the balancing market as resource for Countertrading. For these Core TSOs, however, the balancing market may be the only resource for Countertrading, e.g. because some Core TSOs are not allowed to take position in the intraday market, not even if it is requested by a third party on their behalf.</p> <p>A more detailed description on how balancing markets are used as a resource for Countertrading on a national level is provided in the explanatory note.</p>
4	Stakeholders request clarification how a third party takes position in the	3	See answer	Core TSOs agree with the request for clarification and provide a description in this report. The option that a third party

	intraday market on request of a Core TSO.			<p>may take position in the intraday market on request of a Core TSO addresses the fact that there are different national legal framework conditions in the Core region. In particular, not all Core TSOs are allowed to take positions in the intraday market themselves, but have the possibility that a third party acts on their behalf.</p> <p>Please note that the actual practical implementation how a third party may take position in the intraday market on request of a Core TSO depends on the specific national legislation. Apart from the specific national implementation, Core TSOs acknowledge the importance of full transparency on this matter. Therefore, as stated in the Core RD and CT Methodology, Core TSOs Countertrading and Redispatching actions (in particular also those actions conducted by a third party on behalf of a Core TSO) will be reported as described in the Transparency Regulation and in the Commission Regulation (EC) 543/2013 and 1227/2011 for Energy Market Integrity and Transparency. Furthermore, it is important to stress that the responsibilities and obligations of a third party acting for a Core TSO must be clearly defined. In particular, there will be a clear separation between the obligations of a third party due to balancing responsibility and the obligations due to her actions for a Core TSO. Please also note that the scope of a third party acting for a Core TSO is limited to the intraday market in this Core RD and CT Methodology Proposal.</p>
5	Stakeholders request that there should be no references to national legislation.	1	See answer	Core TSOs do not agree to exclude references to national legislation. The reason for this is that solely national resources are currently available for use. Therefore, national legislation needs to be taken into account. Core

				TSOs acknowledge that in the future there may be a harmonized approach and then references to national legislations are not necessary any longer. Core TSOs will create NRAs' awareness of this topic as well.
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Feedback on Article 6 – Impacts of Redispatching and Countertrading

Stakeholder response		# of Stakeholders requesting	Considered action taken	TSOs answer
1	One stakeholder asks for difference between Article 2 and Article 6.5 countertrading definitions	1	Update of the respective Article / Explanatory Note	There is a difference between CT as a resource and CT as a remedial action. A list of possible combinations for RD and CT will be included in the Explanatory note.
2	One stakeholder recommends that TSOs should provide the RSC with the same type of information for RD and CT	1	See answer	Data to be provided is specified in the Core RD and CT Methodology.
3	One stakeholder asks for clarification of the wording of Article 6.2	1	Update of the respective Article / Explanatory Note	By reviewing the Core RD and CT Methodology this paragraph has been removed.
4	One stakeholder proposes to delete the sentence of Article 6.1(a) to not favour RD over CT	1	Update of the respective Article / Explanatory Note	The explanatory note has been updated regarding the uncertainty of RA. To identify the most efficient solution in the optimization, all remedial actions should be considered; The methodology pursuant to Article 75(1) and 76(1) of SO guideline take all remedial actions (costly and non-costly) into account.

Feedback on Article 7 – Timeframes for Redispatching and Countertrading application

Stakeholder response		# of Stakeholders requesting	Considered action taken	TSOs answer
1	One stakeholder asks to not allow RD & CT actions before the day-ahead coordination process if they are of cross-border relevance.	1	See answer	Generally, RD and CT are done after DA market results are known. The Core RD and CT Methodology at the moment only deals with Redispatching after Day-Ahead Market Closure. For clarification: The Day-Ahead Congestion Forecast is done on D-1 in the evening before D. Redispatching before D-1 market closure is only needed if very long lead times of generators force the TSO to activate redispatching earlier.
2	Stakeholders ask for clarification and detailed description of coordination of RD & CT on regional level	2	See answer	Process of security analysis coordination and coordinated implementation of costly and non-costly remedial actions (as e.g. RD and CT) is under development by TSOs and RSCs under the methodology pursuant of Article 76(1) of SO guideline

Feedback on Article 8 – Day-Ahead and intraday regular process

Stakeholder response		# of Stakeholders requesting	Considered action taken	TSOs answer
1	One stakeholder is concerned that the used grid models are not taking in to account the impact to neighbouring grids.	1	Update of the respective Article / Explanatory Note	The impact of RD and CT Measure on the neighbouring grid is taken into account and has to be considered by the methodology pursuant to Article 75(1) and 76(1) of SO guideline. See update made in the explanatory note section 8 (reference to the reduced grid model has been removed).
2	One stakeholder asks for consideration of non-costly remedial actions as relevant for the coordination from a cross-border perspective.	1	See answer	To identify the most efficient solution in the optimization, all remedial actions should be considered. The Core RD and CT Methodology is the methodology for RD and CT only; the methodology pursuant to Article 75(1) and 76(1) of SO guideline take all remedial actions (costly and non-costly)

				into account.
3	One stakeholder has concerns about the optimization performed by the RSC, especially the sharing of RD Resources in the case of a stepwise optimisation.	1	See answer	TSOs and RSCs strive to develop a single optimisation for all remedial actions. These optimisation principles will be developed by the methodology pursuant to Article 75(1) and 76(1) of SO guideline.
4	One stakeholder asks for the number of CSA in intraday, linked to the number of the capacity calculations.	1	See answer	Number of intraday CSAs will be defined in the methodology pursuant to Article 76(1) of SO guideline.

Feedback on Article 9 – Volume information, availability and exchange of data

	Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	One stakeholder proposes a more continuous process for exchanging volumes available for redispatching.	1	See answer	The information exchanged after the next day’s market closure is the best estimate of RD and CT potential so far. The exchange of information will be made before each CSA according to the terms and conditions described in the methodology pursuant to Article 76(1) of SO guideline

Feedback on Article 10 – Price information exchange

	Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	Stakeholders ask to harmonize the pricing mechanisms for redispatching in the different countries of the Core region & propose specific pricing mechanisms to be used.	3	See answer	According to Article 35(5) of CACM guideline, the revenues for RD and CT can either be price-based (market) or cost-based. The rules for pricing of the RD and CT resources are based on the national legal and regulatory frameworks. An alignment of the pricing rules in CCR region is not a task of the TSOs and will not be considered in this methodology.

2	One stakeholder asks what consequences the absence of capacity remuneration will have for the German "Netzreserve".	1	See answer	The Core RD CT Methodology is not affecting the national obligations regarding capacity remuneration. It depends on the national regulatory framework.
3	One stakeholder asks how distortions, as a result of diverging remuneration schemes, can be avoided.	1	See answer	The rules for pricing of the RD and CT resources are based on the national legal and regulatory frameworks. In present methodology it is foreseen that prices for RD and CT of several countries will be the input for the common optimization.
4	One stakeholder asks to include storage opportunity costs in the cost types listed for the cost-related pricing mechanism.	1	See answer	The rules for pricing of the RD and CT resources are based on the national legal and regulatory frameworks.
5	One stakeholder asks to change the wording 'generation units or load units' by 'resources' in order to not exclude storage.	1	Update of the respective Article / Explanatory Note	As storage is indeed one of the resources for RD and CT, the suggested correction has been applied. This is done in all articles where the wording occurred.

Feedback on Article 11 – Detection and coordination

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer	
1	One stakeholder asks for a more precise description of the term "relevant parties" and more specifically to change to "all relevant parties including generation, transmission and distribution"	1	Update of the respective Article / Explanatory Note	The relevant article is updated to avoid these imprecise wording.
2	One stakeholder asks for more clarification about the platform to be used for sharing data as well as "with whom" the data will be shared.	1	See answer	The platform for data sharing between TSOs and RSCs will be defined in the implementation phase.

3	One stakeholder thinks that it has to be clearly mentioned that before the assessment of any RD & CT actions, one should check whether or not the non-costly actions have been already assessed and exhausted (if efficient and relevant)	1	See answer	The consideration of non-costly remedial actions has to be specified in methodology pursuant to Article 75(1) and 76(1) of SO guideline and is therefore not valid in this methodology. As stated in the explanatory note, it is planned to do a single optimisation of costly and non-costly remedial actions together.
4	One stakeholder is concerned about the RD & CT RA coordination process among different RSCs and TSOs. It is not clear for them whether or not a coordination loop exists in order to select the most efficient and compliant with all involved TSOs RD & CT remedial actions. They see the active participation and support of RSCs in TSO decision-making as a possible mitigation action that will provide a better overview of the RD & CT application.	1	See Answer	Detailed description of the coordination is done in the methodology pursuant to Article 76(1) of SO guideline; the optimization will be done on RSC level; coordination and activation decision of remedial actions is a joined process by RSCs and TSOs; close to real-time activation will include less parties involved.
5	Art. 11.9: This paragraph should apply to both non-costly and costly remedial actions. We see no reason why only non-costly remedial actions are tackled here.	1	Update of the respective Article / Explanatory Note	The Core RD and CT Methodology has been updated accordingly.

Feedback on Article 12 – Activation process for Redispatching and Countertrading

	Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	Stakeholders state it is important that there is a proper communication between TSO and	2	See answer	The Connecting TSO is responsible for the application of the decided remedial actions and

	plant operator in the course of the activation process.			has to ensure the communication to the involved RD and CT parties.
2	One stakeholder points out that the methodology does not deal with returning cross-border capacity to the market when the situation in the grid has changed.	1	See answer	This topic will be covered by Core ID CC process and in CSA process of the methodology pursuant to Article 76(1) of SO guideline.
3	One stakeholder states that any ordered redispatching measure should be paid for, even if it was not activated.	1	See answer	The basis of the cost calculation are the incurred costs. The rules for pricing of the RD and CT resources are based on the national legal and regulatory frameworks.
4	One stakeholder asks to clarify if modification of XB capacities 'to avoid that market trades go in the opposite direction than the RD and CT measures' will not cause curtailment of already allocated capacities.	1	See answer	CT and RD measures aim at relieving congestions and ensure already allocated capacities. Therefore, only the available transfer capacity is put to zero, there is no curtailment of already allocated capacities.

Feedback on Article 13 – Fast activation process

Stakeholder response		# of Stakeholders requesting	Considered action taken	TSOs answer
1	One stakeholder raised the question whether countertrading could be an appropriate way for an urgent "quick start".	1	See answer	In some cases, CT can be used for fast activation (e.g. cross-border congestion).

Feedback on Article 14 – Total cost calculation

	Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	One stakeholder asks that in paragraph 3(b) the following should be included: “including opportunity cost or other cost components on national calculation basis.”	1	See answer	The rules for pricing of the RD and CT resources are based on the national legal and regulatory frameworks. An alignment of the pricing rules in CCR region is not a task of the TSO and will not be considered in this methodology.
2	One stakeholder asks TSOs to check the coherence of the provisions in Art. 14.3 and Art. 10.2 as the wording of these provisions seems redundant.	1	See answer	The provision in the first mentioned Article is about how the costs are calculated ex-post and the provision in the second mentioned Article is about the costs taken into account ex-ante (estimation of indicative prices).
3	One stakeholder asks why in art 14.4 there are elements in brackets that refer to the pricing of RD & CT by the market to the TSOs when the “costs” only refer to the cost incurred by the TSOs for the activation of RD & CT.	1	Update of the respective Article / Explanatory Note	The brackets have been deleted in the methodology as the incurred costs can also be market-based.

Feedback on Article 15 – Reporting

	Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	Stakeholders request a more detailed reporting on Core TSOs redispatching and countertrading actions and ask for details on how transparency requirements will be implemented in practice.	2	See answer	The Core RD and CT Methodology follows the Transparency Regulation & REMIT.

Feedback on Article 16 – Publication of the Core RD and CT Methodology proposal

No feedback was received on this article.

Feedback on Article 17 – Implementation

	Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	One stakeholder asks not to delay the implementation any longer. CACM 35 should be implemented directly and individual balances (€) of TSOs should not hinder it.	1	See answer	<p>Continuous improvement of RD and CT is a daily task of the TSO. Core TSOs see strong dependencies to other methodologies, especially to the methodology pursuant to Article 74(1) of CACM guideline where the cost sharing will be described and to the methodology pursuant to Article 76(1) of SO guideline where the consideration of non-costly and costly remedial actions will be described.</p> <p>The Core RD and CT Methodology covers only costly Remedial Actions and is an input for the methodologies pursuant to Article 74(1) of CACM guideline and pursuant to Article 76(1) of SO guideline. Therefore RD and CT cannot be implemented separately. An optimization of RD and CT is only possible with cost sharing.</p>
2	Stakeholder asks to specify a clear timeline. A firm implementation date should be defined, a timeline especially for “Development, testing and implementation of the systems required to support the Core RD and CT Methodology after approval.”	2	See answer	<p>Core TSOs see strong dependencies to other methodologies, especially to the methodology pursuant to Article 74(1) of CACM guideline where the cost sharing will be described and to the methodology pursuant to Article 76(1) of SO guideline where the consideration of non-costly and costly remedial actions will be described.</p> <p>The Core RD and CT Methodology covers only costly Remedial Actions and is an input for the methodologies pursuant to Article 74(1) of CACM guideline and pursuant to Article 76(1)</p>

				<p>of SO guideline.</p> <p>Therefore currently a clear timeline cannot be included into the Core RD and CT Methodology.</p>
3	Stakeholders ask to implement CACM 35 stepwise and quick wins can be identified and planned.	2	See answer	<p>Core TSOs see strong dependencies to other methodologies, especially to the methodology pursuant to Article 74(1) of CACM guideline where the cost sharing will be described and to the methodology pursuant to Article 76(1) of SO guideline where the consideration of non-costly and costly remedial actions will be described.</p> <p>The Core RD and CT Methodology covers only costly Remedial Actions and is an input for the methodologies pursuant to Article 74(1) of CACM guideline and pursuant to Article 76(1) of SO guideline.</p> <p>Nevertheless continuous improvement of RD and CT is a daily task of the TSOs and the feedback regarding quick wins will be given to the working groups developing the methodologies pursuant to Article 76(1) of SO guideline and to Article 74(1) of CACM guideline.</p>
4	One third party Stakeholder asks to not implement the methodology unless there is an agreed process of coordination with neighbouring non-Core TSOs.	1	See answer	<p>Core TSOs understand the concerns raised by this stakeholder and will actively inform the non-Core TSOs on the further development and detailing of the Core RD and CT methodology.</p>

Feedback on Article 18 – Language

No feedback was received on this article.

Feedback on Article 19 – Confidential treatment of information

No feedback was received on this article.