
IU Capacity Calculation Region TSOs' proposal for the methodology for Coordinated Redispatching and Countertrading in accordance with Article 35(1) of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management

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All Transmission System Operators of the IU Capacity Calculation Region, taking into account the following,

Whereas

- (1) Commission Regulation (EU) 2015/1222 establishes a guideline on capacity allocation and congestion management (hereinafter referred to as the “CACM Regulation”), which entered into force on 14 August 2015.
- (2) This document, including its annex, is a common proposal developed by all Transmission System Operators (hereafter referred to as “TSOs”) of the IU Capacity Calculation Region as defined in accordance with Article 15 of CACM Regulation (hereafter referred to as “IU Region”) regarding the proposal for the methodology for Coordinated Redispatching and Countertrading (hereafter referred to as “RD and CT Methodology”) in accordance with the CACM Regulation. This proposal is required by Article 35(1) of the CACM Regulation. The RD and CT Methodology was consulted from 12 January 2018 until 12 February 2018 in accordance with Article 12 of CACM Regulation.
- (3) The TSOs of the IU Region (hereafter referred to as “IU TSOs”) aim at ensuring consistency with Coordinated Redispatching and Countertrading methodologies of other Capacity Calculation Regions in which same bidding zones are concerned whilst acknowledging the specific characteristics of the interconnectors within the IU Region.
- (4) This proposal takes into account the TSOs' proposal for a day-ahead and intraday capacity calculation methodology (hereinafter referred to as the “IU DA and ID CC Methodology”) in accordance with Article 20 of the CACM Regulation and submitted to the NRAs of the IU Region for approval on 15 September 2017.
- (5) In the context of this proposal, the definition of ‘IU RSCs’ as defined in the Article 2 of this RD and CT Methodology is important and has the meaning of the Regional Security Coordinator as defined into the Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation (hereinafter referred to as the “SO GL Regulation”).
- (6) Changing the flow over an HVDC interconnector in the IU Region for Redispatching and Countertrading purposes results in an imbalanced situation in the control areas to which the interconnector is connected (since the HVDC interconnector is between two different Synchronous Areas). Therefore bids must be activated at both ends of the HVDC interconnector in order to restore the balance (locally or cross-border). By doing so the TSOs need nevertheless to consider local physical congestion issues for selecting the bids.
- (7) This RD and CT Methodology contributes to and does not in any way hinder the achievement of the objectives of Article 3 of the CACM Regulation. In particular this RD and CT Methodology:
 - a. Establishes a common and coordinated process for the Redispatching and Countertrading by defining a set of harmonised rules for congestion management and as such serves the objective of promoting effective competition in the

- generation, trading and supply of electricity in accordance with Article 3(a) of the CACM Regulation;
- b. Contributes to the objective of ensuring optimal use of the transmission infrastructure in accordance with Article 3 (b) of the CACM Regulation by using last available inputs based on the best possible forecast of transmission systems and market results at the time of each security analysis, updated in a timely manner, for the detection of Coordinated Redispatching and Countertrading needs.
 - c. Contributes to the objective of ensuring operational security in accordance with Article 3 (c) of the CACM Regulation by coordinating the Coordinated Redispatching and Countertrading at regional level to ensure its reliability;
 - d. Contributes to the objective of optimising the calculation and allocation of cross-zonal capacity in accordance with Article 3 (d) of the CACM Regulation by integrating the timings of the Coordinated Redispatching and Countertrading process into the timings of the different Capacity Calculation process steps.
- (8) The scope of the RD and CT Methodology is limited to relieve physical congestions by means of a cross zonal exchange initiated by system operators between two bidding zones.

SUBMIT THE FOLLOWING PROPOSAL TO ALL NATIONAL REGULATORY AUTHORITIES OF THE IU REGION:

TITLE 1

General Provisions

Article 1

Subject matter

1. This RD and CT Methodology is the common proposal of all onshore TSOs of the IU Region in accordance with Article 35 of the CACM Regulation.

Article 2

Definitions and interpretation

1. For the purposes of the RD and CT Methodology, the terms used shall have the meaning given to them in:
 - a. Article 2 of the CACM Regulation; and
 - b. Article 3 of SO GL Regulation.
2. In addition, the following definitions shall apply:
 - a. 'Requesting TSO' means the IU TSO responsible for the real time operation of their control area and directly involved in Coordinated Redispatching or Countertrading processes and who requests the Coordinated Redispatching or Countertrading process to relieve physical congestion in its control area;
 - b. 'Assisting TSO' means the IU TSO responsible for the real time operation of their control area and participates with the Requesting TSO in Coordinated Redispatching or Countertrading;
 - c. 'Facilitating TSO' means the IU TSO(s) responsible for the real time operation of the interconnector(s) linking the control area of the Requesting TSO and the control area of the Assisting TSO and on which the flow is to be modified as a result of Coordinated Redispatching or Countertrading;
 - d. 'Participating TSOs' means the Requesting TSO, the Assisting TSO and the Facilitating TSO;
 - e. 'Interconnector Countertrading and Redispatching Time Unit' (ICRTU) means the minimum duration of an Activation Period. The ICRTU value is determined by the TSO(s) operating the interconnector on the basis of technical and market constraints and following consultation with the TSO(s) responsible for the real time operation of the control areas connected by the interconnector;
 - f. 'Nomination Platform' means the relevant system(s) used by Participating TSOs to manage the nominations on an interconnector asset of a Facilitating TSO;
 - g. 'Interconnector Countertrading Deadline' means the deadline for instructing the interconnector with the Countertrading. This deadline is interconnector dependent, determined by the TSO(s) operating the interconnector following consultation with

the TSO(s) responsible for the real time operation of the control areas connected by the interconnector and represents the time before the effective delivery of energy on the interconnector, needed to transform the aggregated commercial and Countertrading nominations into interconnector reference program;

- h. 'RSC Coordination Deadline' means the latest moment in time when the IU RSCs are able to perform the coordination for coordinated Redispatching or Countertrading and the operational security assessment. After this deadline, the coordination process could exceptionally be done between IU TSOs without the participation of IU RSCs. This deadline depends of the methodology for the preparation of remedial actions managed in a coordinate way in accordance with Article 76(1)(b) of SO GL Regulation;
- i. 'Activation Period' means the period of time during which coordinated Redispatching and Countertrading is activated. The duration of the period must be an entire multiple of the ICRTU;
- j. 'RD and CT Actions' means the measures initiated by the Requesting TSO and Assisting TSO in order to compensate the change of physical flow on the interconnector resulting from the coordinated Redispatching or Countertrading process and restore the balance in their respective control area; and
- k. 'IU RSCs' means the Regional Security Coordinators operating in the IU Region.
- l. 'Coordinated Security Analysis' means the service provided by RSCs to identify risks of operational security limit violations and to determine, propose and coordinate the most efficient remedial actions with relevant TSOs and adjacent RSCs.

3. In this RD and CT Methodology, the following acronyms are used:

- a. 'AAC' means 'Already Allocated Capacity';
- b. 'CCC' means the 'Coordinated Capacity Calculator';
- c. 'CNTC' means 'Coordinated Net Transmission Capacity';
- d. 'SDAC' means the 'Single Day-Ahead Coupling';
- e. 'SIDC' means the 'Single Intraday Coupling';
- f. 'IGM' means the 'Individual Grid Model'; and
- g. 'CCR' means the 'Capacity Calculation Region'.
- h. 'CSA' means the 'Coordinated Security Analysis'

4. In this RD and CT Methodology, 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 this RD and CT Methodology; and

- c. any reference to legislation, regulations, directives, orders, instruments, codes or any other enactment shall include any modification, extension or re-enactment of it when in force.

Article 3 **Scope**

1. The scope of this RD and CT Methodology is limited to the Coordinated Redispatching and Countertrading on bidding zone borders of the IU Region in accordance with Article 35 of CACM Regulation.
2. Coordinated Redispatching and Countertrading in the IU Region are a set of Remedial Actions that must be considered as one package:
 - a. Change of flow on the Interconnector of a bidding zone border of the IU Region which significantly contributes to the relieving effect of the physical congestions. This change of flow has to be coordinated in all conditions;
 - b. RD and CT Actions in the Bidding Zone of the Assisting TSO which might be coordinated if there is a cross-border impact;
 - c. RD and CT Actions in the Bidding Zone of the Requesting TSO, localized in case of Redispatching and not localized in case of Countertrading, which might be coordinated if there is a cross-border impact.
3. Coordinated Redispatching and Countertrading in the IU Region consist of the following aspects:
 - a. volume information and availability exchange and price information exchange;
 - b. detection;
 - c. coordination;
 - d. selection of RD and CT Actions;
 - e. activation of RD and CT Actions and update of nomination on the IU Interconnector;
 - f. total cost calculation;
 - g. reporting; and
 - h. cost sharing and settlement.

The cost sharing and settlement aspect as set out in points (f), (g) and (h) above are detailed in the separated methodology in accordance with Article 74 of CACM Regulation.

4. In order to implement this RD and CT Methodology, border-specific Coordinated Redispatching and Countertrading operational procedures (hereafter referred to as "RD and CT Procedures") will be established during the implementation phase between relevant TSOs of each bidding zone border in the IU Region. These RD and CT Procedures shall comply with the rules and principles laid out in this IU RD and CT Methodology.

5. As soon as possible, as described in Article 16.1 of this IU RD and CT Methodology, the IU RSCs of the IU Region must apply the common provisions for regional operational security coordination in accordance with the Article 76 of SO GL Regulation.

TITLE 2

Coordinated Redispatching and Countertrading

Article 4

General principles for Coordinated Redispatching and Countertrading

1. All bidding zone borders of the IU Region consist of HVDC interconnectors between Great Britain (GB), Northern Ireland (NI), and Ireland (IE). Redispatching or Countertrading on IU Region bidding zone borders are implemented by means of change of the physical flow over the interconnector assets owned by the Facilitating TSO, which results in a change in offtake or injection at the connection point of the interconnectors. This has as a consequence that:
 - a. in case of a change of interconnector physical flow, an imbalance occurs in both the control areas of the Requesting and Assisting TSOs. This imbalance is to be resolved by RD and CT Actions to restore the balance;
 - b. the RD and CT Actions initiated by the Requesting TSO have no impact on the flows in the control area of the Assisting TSOs and vice versa;
 - c. in case of Redispatching, the RD and CT Actions have a precisely defined location in the control area of the Requesting TSO, in order to contribute to the relieving effect on the physical congestion;
 - d. in case of Countertrading, the RD and CT Actions has no specific location;
 - e. volumes of Countertrading or Redispatching refer to the volumes of RD and CT Actions activated by the Requesting TSO and the Assisting TSO; and
 - f. costs of Countertrading or Redispatching refer to the directly related costs incurred by the Requesting TSO and the Assisting TSO for the RD and CT Actions activation and the directly related costs incurred by Facilitating TSOs for changing the flow over the interconnector.
2. All Countertrading and Redispatching referred to in this RD and CT Methodology are cross-border relevant by their nature because of their application on an Interconnector of the bidding zone borders of the IU region, and therefore the change of flow on the Interconnectors shall always be coordinated.
3. A coordinated Redispatching and Countertrading remedial action that does not follow the description of the Article 3 (2) of this RD and CT methodology falls outside of this IU RD and CT Methodology and have to be handled in the coordinated Redispatching and Countertrading methodologies developed in accordance with Article 35(1) of the CACM Regulation by the relevant CCR.
4. Coordinated Redispatching and Countertrading is coordinated between the TSOs of the IU Region in accordance with Article 9 and Article 10. In this RD and CT Methodology, this coordination is further ensured by the role played by the IU RSCs in the coordinated Redispatching and Countertrading, in accordance with Article 76 of the SO GL Regulation.

5. Coordinated Redispatching and Countertrading are Remedial Actions proposed by the RSC, following the criteria defined in the Article 21 of SO GL Regulation, unless in exceptional cases where coordinated RD and CT is decided in period 4 as defined in Article 5.
6. The cost sharing principles described in the IU RD and CT Cost Sharing Methodology apply to Coordinated Redispatching and Countertrading on Interconnectors of bidding zone borders of the IU Region applied in the frame on this RDCT IU Methodology. Those are Remedial Actions of cross border relevance.
7. The IU RSCs shall assess the impact of Redispatching and Countertrading on the control areas of the TSOs, in accordance with Article 76 of SO GL Regulation.
8. The Requesting TSO shall, upon request by the Assisting TSO, provide the justification of the need for applying Coordinated Redispatching and Countertrading.
9. The Requesting TSO can only perform Coordinated Countertrading and Redispatching remedial actions over interconnectors connected to its own control area.

Article 5

Timeframes for Coordinated Redispatching and Countertrading

1. The Coordinated Redispatching and Countertrading process can be initiated by a Requesting TSO after the results of SDAC or, when applicable, regional fall back solutions in accordance with Article 44 of the CACM Regulation.
2. Coordinated Redispatching and Countertrading shall be instructed to the Facilitating TSO before the Interconnector Countertrading Deadline specified in the annex.
3. Four different timeframes should be considered for Coordinated Redispatching and Countertrading, :
 - a. Period 1 is considered in case of Coordinated Redispatching and Countertrading activation between the start time mentioned in Article 5(1) and the deadline for the “*Input Data Gathering*” phase of the Intraday Capacity Calculation of the Intraday Capacity Calculation;
 - b. Period 2 is considered in case of Coordinated Redispatching and Countertrading activation between the “*Input Data Gathering*” and the “*Validation*” phase of the Intraday Capacity Calculation;
 - c. Period 3 is considered in case of Coordinated Redispatching and Countertrading activation after the “*Validation*” phase of the Intraday Capacity Calculation and before the RSC Coordination Deadline; and
 - d. Period 4 is considered in case of Coordinated Redispatching and Countertrading activation after the RSC Coordination Deadline and before the Interconnector Countertrading Deadline.

Article 6

Volume information availability and exchange

1. Each of the IU TSOs who have their control area linked by one or several interconnector(s) within the IU Region will inform each other on indicative and non-firm volumes available for coordinated Redispatching and Countertrading, in each direction, after the publication of the results of the SDAC. This exchange of information will also be made available to the IU RSCs.
2. The exchanged information on volumes shall take into account any legal obligation of each TSO regarding the Reserve Capacity and ensuring to stay within the operational security limits.
3. The timing for exchanging the volumes for each border is described in the annex..
4. This shared volume is not binding and is a best endeavours estimate of the available volume that could be available for coordinated Redispatching and Countertrading to solve physical congestion only. Requesting and Assisting TSOs shall inform each other how the volume is calculated and updated.
5. Volume information exchange procedure is border-specific and will be described bilaterally between the two relevant Requesting and Assisting TSOs in the RD and CT Procedure.
6. Facilitating TSOs shall inform the relevant TSOs as soon as reasonably practicable of any unavailability of the interconnector asset (planned or unplanned) for the coordinated Redispatching and Countertrading process.

Article 7

Price information exchange

1. Each of the IU TSOs who have their control area linked by one or several interconnector(s) within the IU Region will communicate to each other indicative estimation of prices associated to the volumes available for coordinated Redispatching and Countertrading, after the publication of the results of the SDAC. This exchange of information will also be made available to the IU RSCs.
2. In accordance with Article 35(5) of CACM Regulation, prices of the volumes available for Coordinated Redispatching and Countertrading shall be based either on:
 - a. prices in the relevant electricity markets for the relevant time-frame; or
 - b. the cost of resources available for the Coordinated Redispatching and Countertrading action at that moment in time.
3. The price information exchange procedure is border-specific and will be described bilaterally between the two relevant Requesting and Assisting TSOs in the RD and CT Procedure. A deadline for the exchange of information on the price of RD and CT actions is given in the annex..

Article 8

Detection

1. The Coordinated Redispatching and Countertrading process can be initiated in one of the timeframes defined in Article 5 of this RD and CT Methodology after the detection of a physical congestion in the control area of a IU TSO.
2. The physical congestion can be detected by either a IU TSO or a IU RSC on behalf of IU TSOs when performing the CSA service. The IU TSO who operates the control area where the physical congestion is detected will be considered the Requesting TSO for the purposes of this RD and CT Methodology.
3. In each case where physical congestion is detected, all involved parties at this stage must contact and provide each other with all the information needed to have a common view on the physical congestion to be solved.
4. The IU RSCs shall, according to Article 78 of SO GL Regulation, recommend to the relevant IU TSO effective and economically efficient remedial actions to solve the identified physical congestion, based on the available price and volume information. This recommendation for remedial actions shall be accompanied by explanations as to its rationale.
5. In case of several interconnectors on the same border, the selection of one or several interconnectors on which the flow will be modified will be done by the Requesting and Assisting TSOs or the IU RSCs on their behalf, based on the location of the physical congestion, operational security and economic efficiency (i.e. losses).
6. In case of two coordinated Redispatching and Countertrading requests with overlapping Activation Period between two Participating TSOs, the RSC should analyse and advice on the volume and the direction of the coordinated Redispatching or Countertrading. The final decision will always be taken jointly by the Requesting and the Assisting TSO.
7. If the proposed Remedial Action is a Countertrading on a IU Interconnector, the Requesting TSO can propose to specify the localization of the RD and CT Actions if this one contributes to the relieving effect of the physical congestion, transforming the proposed Countertrading into Redispatching. This extra contribution to the relieving effect on the physical congestion shall, as consequence, have a positive effect on the needed volume of change of flow on the interconnector initially estimated by the RSC, which will be lower, as well as the RD and CT Actions to be provided by the Assisting TSOs.
8. In accordance with Article 78 of SO GL Regulation, the relevant IU TSOs shall jointly decide whether to initiate the recommended remedial action. In the case where the recommended remedial action is a Coordinated Redispatching or Countertrading on a border of the IU Region, the coordination process will be initiated in accordance with Article 9 of this RD and CT Methodology. Where the relevant TSO decides not to initiate the recommended remedial action, a justification for this decision shall be provided to the IU RSCs.

Article 9

Coordination

1. The coordination process will be initiated by the Requesting TSO or by the IU RSCs where the IU RSCs have originally detected the constraint. For period 1-3 the TSO will ensure the RSC has the latest indicative volumes and prices
2. The Requesting TSO will provide the Assisting TSO, the Facilitating TSO(s) and the IU RSCs with the Coordinated Redispatching or Countertrading characteristics based on the information collected during the detection phase.
3. Coordinated Redispatching or Countertrading characteristics should at least contain the following elements:
 - a. The interconnector identification(s);
 - b. The direction of the modification of flow on the interconnector ;
 - c. The Activation Period;
 - d. The estimated needed modification of flow volume and RD and CT Actions volume information for the Activation Period, based on the current market situation.
4. The Assisting TSO must confirm the feasibility of the required coordinated Redispatching and Countertrading for the duration of the Activation Period.
5. The IU RSCs shall perform, if needed, a new CSA to analyse the impact of the Redispatching or Countertrading on all IU TSOs, and verify the actual need of Coordinated Redispatching or Countertrading, in function of the last agreed Coordinated Redispatching and Countertrading characteristics between Participating TSO, taking into account the possible location of RD and CT actions in the Requesting TSOs control area in case of Redispatching.
6. Any significant impact detected by a Participating TSO or a IU RSC on other IU TSO's control area must be communicated to all impacted IU TSOs and followed-up by the IU RSCs who shall collect the feedback from those IU TSOs and share them with the Participating TSOs.
7. If a Participating TSO or a IU RSC detects a significant impact on the flows of another IU TSO's control area, these IU TSOs will be consulted in the decision described in the Article 9(8). In the case where this impact will create a physical congestion in its control area, this IU TSO will be considered as Assisting TSO in the decision described in the Article 9(8) and 9(9) of this IU RD and CT Methodology.
8. If the Participating TSOs confirm the feasibility of the Coordinated Redispatching and Countertrading, the Requesting TSO and the Assisting TSO shall jointly decide to effectively perform the Coordinated Redispatching and Countertrading, taking into account the analysis from the IU RSCs, the grid situations of each Participating TSO's control area and the potential interconnector(s) constraints.
9. The Participating TSO that rejects the request must provide a justification to the other Participating TSOs. The justification can only be based on the following events:

- a. no volume available for RD and CT Actions;
 - b. new physical congestion created by the countertrading;
 - c. condition has changed since the decision done during the detection phase (e.g. forecasts may turn out to be significantly incorrect or there could have been a system incident such as the loss of generation or demand)
 - d. adequacy issues (e.g. forecasts of adequacy turn out to be significantly in error)
 - e. safety issues
10. Where rejection has been made and justification has been accepted for not conducting a remedial action the RSC shall propose a different action. If the second action is also rejected the Requesting TSO will have to use local emergency actions.

Article 10 **Fast coordination**

1. In the exceptional case that a need for Coordinated Redispatching and Countertrading is only detected during Period 4, then the detection and coordination processes described in Articles 8 and 9 of the RD and CT Methodology is limited to the Participating TSOs without the IU RSCs, with the aim to solve the physical congestion at the basis of said request.
2. If the Participating TSOs detect a risk of significant impact on the control area of other IU TSOs, they will be contacted by the Requesting TSO to be part of the fast coordination process.

Article 11

Activation of Coordinated Redispatching and Countertrading

1. The volumes and Activation Period will be matched between the Requesting and Assisting TSO.
2. The exact matching process and the reference point for the nomination is border-dependant and is described in the RD and CT Procedures.
3. During the Period 1, the Participating TSOs will:
 - a. ensure that the Nomination Platform is instructed with the Coordinated Redispatching and Countertrading nomination on the Interconnector; and
 - b. update their IGM. Those IGM will serve as input for the intraday capacity calculation.
4. During the Period 2, 3 and 4 the Participating TSOs will:
 - a. ensure that the Nomination Platform is instructed with the Coordinated Redispatching and Countertrading nomination on the Interconnector;
 - b. update their IGM, if relevant.
5. The Participating TSOs responsible for the actions in Article 11(3), 11(4) and 11(5) will be defined in the relevant RD and CT Procedures.
6. The Coordinated Redispatching and Countertrading nomination on the Interconnector will be netted with the existing market nominations on the Nomination Platform.
7. While the Activation Period can be any multiple of the ICRTU, all changes to cross-border NTC values will have a minimum duration of the smallest cross-border allocation product available on that border for the relevant timeframe.
8. The relevant TSO systems will be notified by the Nomination Platform with updated data.

Article 12

Selection of RD and CT Actions

1. Changing the flow over an Interconnector of the IU Region, for Redispatching and Countertrading purposes, results in an imbalanced situation in the control areas to which the interconnector is connected since this Interconnector connects two different synchronous areas. Therefore RD and CT Actions must be activated at both ends of the Interconnector in order to restore the balance.
2. The selection of the RD and CT Actions in each control area is the responsibility of the TSO operating each control area.
3. The RD and CT Actions is only triggered by the change of flow initiated on a IU Interconnector.

4. In accordance with Article 35(3) of CACM Regulation, the RD and CT Actions may be composed of
 - a. activation of available generation units and loads (or the negation of planned activation of available generation units or loads which are complimentary to the change of interconnector physical flow), in accordance with the appropriate mechanisms, relevant markets and agreements applicable to its control area. As long as these local RD and CT Actions compensate the effect of the Redispatching or Countertrading in each control area, while ensuring the local operational security, they shall be firstly used; and
 - b. activation of cross-border exchanges of energy with neighbouring bidding zone through interconnector attributed to bidding zone borders not included in the IU Region, in accordance with the appropriate mechanisms, relevant markets or agreements applicable specifically to these bidding zone borders.
5. The exact list of RD and CT Actions is border specific and will be described in the bilateral RD and CT Procedures.
6. Each IU TSO operating a control area should publish an high-level overview of the RD and CT Actions that could be activated to restore the balance of their grid on their respective website. This overview should be available before the implementation of the methodology on their IU Bidding zone border and should be updated each time there is a significant change in this list.

This overview should contain

 - a. the type of RD and CT Actions that could be activated after the coordination process;
 - b. the type of RD and CT Actions considered in the volume and price Day-ahead indicative forecast;
 - c. the timing to exchange these forecasts;
 - d. the possible interaction of RD and CT Actions with other resources and products;
 - e. the rules for selecting RD and CT Actions; and
 - f. the rules for calculating the costs of RD and CT Actions
 - g. the principles behind the selection of RD and CT actions
 - h. the principles used to calculate RD and CT actions.
7. TSOs should activate the most effective and economically efficient RD and CT Actions amongst the resources available for RD and CT Actions. TSOs shall also consider local physical congestion issues and operational security constraints when performing the selection of RD and CT Actions.
8. The description of the available RD and CT Actions and the selection process of these RD and CT Actions in each control area should be described in a transparent way in

compliance with the principles described in this RD and CT Methodology in the relevant RD and CT Procedures.

TITLE 3

Miscellaneous

Article 13

Publication

1. The TSOs shall publish the RD and CT Methodology without undue delay after all national regulatory authorities have approved the RD and CT Methodology in accordance with Article 9 of the CACM Regulation.

Article 14

Confidentiality of information

1. All data will be considered as confidential records and treated as such, unless publication is required by an applicable reporting obligation. It is understood that the information and data handled during the coordinated Redispatching and Countertrading process is sensitive, and should on this basis be treated as confidential. As a result all information gathered, analysis performed and other data available to the involved Parties are deemed confidential and will only be available for the TSOs members in the restricted part of the common tools and platforms, unless required to be published by applicable reporting obligation by implementation date of this IU RD and CT Methodology.
2. The parties will prepare ad hoc confidentiality agreements. The corresponding data and information shall be managed and labelled by the TSOs members in accordance with this policy and procedure to ensure its protection.

Article 15

Cancellation of Coordinated Redispatching and Countertrading nominations

1. In the case of curtailment of commercial nominations, the Facilitating TSO will first cancel, if relevant and in coordination with the Participating TSOs, the existing Coordinated Redispatching and Countertrading nominations before curtailing the commercial nominations.
2. In the case of a capacity shortage (such as an unplanned outage) where the Facilitating TSO is unable to physically flow the requested energy volume due to a technical issue then the Facilitating TSO will first cancel, if relevant and in coordination with the Participating TSOs, the existing Coordinated Redispatching and Countertrading nominations before taking the needed actions to mitigate this technical issue while assuring the firmness of other existing commercial nominations.
3. In the case of unplanned outage or unexpected change of the forecasted production or load pattern in the control area of the Requesting TSO or Assisting where the Requesting TSO or Participating TSO is unable to provide the planned RD and CT Actions needed to compensate the Coordinated Redispatching and Countertrading, Participating TSOs could jointly decide to cancel a part or the totality of the existing Countertrading nominations.

Article 16 Implementation

1. The implementation of this RD and CT Methodology is subject to:
 - a. Regulatory approval of this RD and CT in accordance with Article 9 of the CACM Regulation;
 - b. Regulatory approval of Redispatching and Countertrading Cost Sharing Methodology required by Article 74 of the CACM Regulation in accordance with Article 9 of the CACM Regulation;
 - c. Regulatory approval of Common Coordinated Capacity Calculation Methodology required by Article 20 of the CACM Regulation in accordance with Article 9 of the CACM Regulation; and
 - d. Development and implementation of the systems required to support the RD and CT Methodology.
 - e. Regulatory approval of the all TSO's proposal for a methodology for coordinating operational security analysis in accordance with Article 75(1) of SO GL Regulation.
 - f. Regulatory approval of the proposal for common provisions for regional operational security coordination in the IU Region in accordance with Article 76(1) of SO GL Regulation, and organisation, development and implementation of CSA services in the IU Region by IU RSCs.
2. Due to the dependencies described above, this RD and CT Methodology will be implemented no later than 12 months after the approval of this methodology except in case of delay in the dependencies specified in Article 16(1)(e) and Article 16(1)(f) where a transitional phase could be added in the implementation of this methodology.
3. IU TSOs will, if possible, endeavour to implement this RD and CT Methodology as soon as possible before the 26 months after the regulatory approval of capacity calculation region, in order to develop the report assessing the progressive coordination and harmonisation of coordinated Redispatching and Countertrading mechanisms and agreements and including proposals required by Article 35(3) of the CACM Regulation.

Article 17 Language

1. The reference language for this common capacity calculation Proposal shall be English. For the avoidance of doubt, where TSOs need to translate this RD and CT Methodology into their national language(s), in the event of inconsistencies between the English version published by TSOs in accordance with Article 9(14) of the CACM Regulation and any version in another language, the relevant TSOs shall be obliged to dispel any inconsistencies by providing a revised translation of this RD and CT Methodology to their relevant national regulatory authorities.

Annex

Border	GB-IE	GB-NI
ICRTU	30 minutes	30 minutes
Interconnector Countertrading Deadline	30 minutes before delivery	30 minutes before delivery

Type of RD and CT actions

EirGrid/ SONI	Bids and offers from the SEM balancing market
NGESO	Bids and offers from the GB balancing market

Type of RD and CT actions considered in volume and price day-ahead indicative forecast

EirGrid/ SONI	Actions available based on SEM balancing market offers and bids.
NGESO	NGESO will use a forecast imbalance volume for the system based on short term historic outturn data and will forecast balancing prices based on short term historic balancing prices

Timing for exchange of price and volume information

EirGrid/ SONI	<p>Indicative prices and volumes for day D will be provided at a time before 19:00 CET on D-1 which will be determined during the implementation phase.</p> <p>Prices may subsequently be updated at any time up to (time duration to be determined during implementation phase) before potential activation of the service.</p> <p>Volumes may subsequently be updated at any time up to (time duration to be determined during implementation phase) before potential activation of the service.</p>
NGESO	On a daily basis by 19:00 CET in day-ahead, NGESO will provide the price and volume forecasts. Manual update of price/volume forecast possible upon request and during the coordination process

Firmness deadlines for price and volume of RD and CT actions

EirGrid/ SONI	Volume and prices are considered firm once the Redispatch or Countertrade is confirmed
NGESO	Volume and prices are considered firm once the Redispatch or Countertrade is

confirmed

Coordination of RD and CT actions

EirGrid/ SONI	<ul style="list-style-type: none"> • Requesting TSO contacts Assisting TSO to initiate the RD and CT process. • This request is submitted by the Requesting TSO to the Assisting TSO with the following parameters: <ul style="list-style-type: none"> - The RD and CT Volume; - The RD and CT direction; - The start and end time. • The Assisting TSO shall confirm the RD and CT Volume. • The Assisting TSO shall confirm firm prices for the RD and CT Volume. • If the RD and CT Volume cannot be provided, or only partially provided, the Assisting TSO shall provide an explanation. • If the Requesting TSO wishes to proceed with the RD and CT Action, they shall contact the Assisting TSO to confirm the RD and CT parameters. • The Assisting TSO shall confirm the RD and CT parameters <p>At this time the RD and CT Action is firm.</p>
NGESO	<ul style="list-style-type: none"> • Requesting TSO contacts Assisting TSO to initiate the RD and CT process. • This request is submitted by the Requesting TSO to the Assisting TSO with the following parameters: <ul style="list-style-type: none"> - The RD and CT Volume; - The RD and CT direction; - The start and end time. • The Assisting TSO shall confirm the RD and CT Volume. • The Assisting TSO shall confirm firm prices for the RD and CT Volume. • If the RD and CT Volume cannot be provided, or only partially provided, the Assisting TSO shall provide an explanation. • If the Requesting TSO wishes to proceed with the RD and CT Action, they shall contact the Assisting TSO to confirm the RD and CT parameters. • The Assisting TSO shall confirm the RD and CT parameters <p>At this time the RD and CT Action is firm.</p>

Rules for calculating the costs of RD and CT actions

EirGrid/ SONI	The cost of the action will be the agreed firm price multiplied by the volume of the action.
NGESO	<p>NGESO will use a forecast imbalance volume for the system based on short term historic outturn data and will forecast balancing prices based of short term historic balancing prices.</p> <p>If there is any forecasted physical congestion that the RD and CT actions</p>

exacerbate then the quoted price will be based only on the activation price of the potential units that can alleviate such physical congestion.

If the requested RD and CT action would increase the size of the largest instantaneous supply of demand loss then

1. The cost of raising inertia to securable levels (if required) will be incorporate into the price
2. The cost of holding additional high, primary and/or secondary frequency response (as defined in the GB Grid Code) will be incorporated into the price

Finally if the RD and CT action leaves insufficient upwards or downwards active power reserve, then the cost of either synchronising additional units or desynchronising units will be reflect in the price