

**Consultation Report amendment of the Greece-Italy CCR
fallback procedures in accordance with Article 44 of the
Commission Regulation (EU) 2015/1222 of 24 July 2015
establishing a guideline on capacity allocation and congestion
management**

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Table of Contents

GLOSSARY.....	3
Introduction.....	3
Amendment of the Greece-Italy CCR fallback procedures – consultation feedback and Greece-Italy TSOs’ reaction.....	3

GLOSSARY

All definitions and abbreviations of the Greece-Italy CCR fallback procedures apply accordingly.

Introduction

This document is the consultation report for the amendment of the Greece-Italy CCR fallback procedures in accordance with Article 44 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management

Greece-Italy TSOs would like to thank all parties involved in the public consultation for their interest in the amendment of the Greece-Italy CCR fallback procedures. Greece-Italy TSOs welcome the feedback received as it is valuable for the further development and detailing of the amendment of the Greece-Italy CCR fallback procedures.

Via the ENTSO-E Consultation Platform, the public consultation document for the amendment of the Greece-Italy CCR fallback procedures was available to stakeholders from the 21th of January 2022 until the 20th of February 2022. In total, one stakeholder participated in the public consultation. Please note that the response is shared with the Greece-Italy National Regulatory Authorities (NRAs) for their regulatory assessment.

Greece-Italy TSOs wish to clarify that the content of this document is intended to summarize the results obtained in the public consultation. The Greece-Italy TSOs did their best to reply to all comments and concerns.

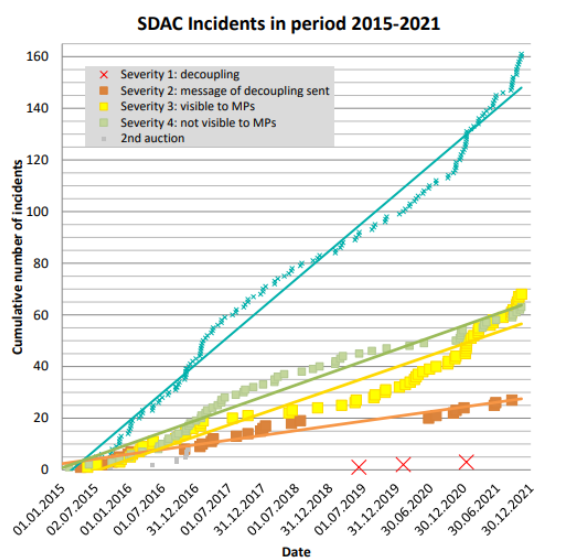
Amendment of the Greece-Italy CCR fallback procedures – consultation feedback and Greece-Italy TSOs’ reaction

Following contributions have been provided to the public consultation:

European Federation of Energy Traders (EFET)	Greece-Italy TSOs’ response
<p>The European Federation of Energy Traders (EFET) welcomes the opportunity to provide comments regarding the amendments proposed by ENSTO-E on the day-ahead fallback procedures in the Core, Italy North, Greece-Italy, SEE and SWE Capacity Calculation Regions (CCRs) in accordance with Article 44 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 (CACM). However, the proposal of the TSOs, based on a decision of the SDAC Joint Steering Committee, comes with too little justification to enable us to take a firm position on it. EFET has been supportive for some time now of granting the day-ahead coupling process more time to improve its resilience and the capacity of the algorithm to find the most optimal solutions. The proposal to shift the shadow auction results publication deadline from D-1 14h00 to D-1 14h20 and to cancel the second auction in case of full decoupling seems to indicate a move in that direction by granting more time to the “standard” coupling process.</p> <p>Nonetheless, these changes – in particular the cancellation of the second auction – also imply a lower level of security for the SDAC should the “standard” coupling process fail even with an extra 20 minutes. Therefore, a thorough impact assessment of the proposed changes should have been performed and made publicly available to enable market participants to take an informed decision on the matter. Furthermore, the conditions for a cancellation of the second auction remain unclear for us, considering that cases of full decoupling are only known ex-post in the coupling process, and that the decision to cancel the second auction would need to be taken during that process</p> <p>Hence, the NEMOs and TSOs proposal should have be accompanied by:</p> <ul style="list-style-type: none"> - a probabilistic forecast of the algorithm's chances to find a solution – and avoid full (or partial) decoupling – or a more 	<p>CCR Greece-Italy TSOs welcome the past and present support of EFET to improve the resilience of market coupling by shifting of operational timings.</p> <p>First of all, we would like to clarify that the second auction does not apply to the Greece-Italy CCR.</p> <p>Nevertheless, CCR Greece-Italy TSOs fully support EFET in having meaningful stakeholder involvement on SDAC level in market coupling and its operations (see previous answer on the new MCSC consultative group).</p> <p>For sake of clarity, SDAC TSOs and NEMOs propose to shift the operational timings (i.e. by 20min) exclusively in case of a full decoupling (see figure below) as only 6 of the 27 countries currently active in SDAC use this “reserved” timing. A reduction of some flexibility to few parties effectively brings a significant advantage to the whole community (reducing also the risk that the second auction after full decoupling is needed).</p> <p>In order to be “flexible” in case of any incident (incl. partial/full decoupling) SDAC TSOs and NEMOs decided not to codify exact timings. Therefore, as much time as possible or as little time as needed is given to the market coupling operator to solve the “day-to-day” problem/s at hand. Additional information can be found as well within the SDAC presentation from the MESC meeting on 1st of December 2021.</p>

optimal solution within the extra 20 minutes granted to the standard coupling process; and
- a clear definition of criteria upon which – or a clear cut-off point as of when – the cancellation of the second auction is decided

We understand that NEMOs organised bilateral discussions with individual market participants to discuss these changes. Their feedback was positive but based according to us on partial information. We regret that the NEMOs did not formally consult the market with full details and justifications on their proposal before taking a decision in the SDAC Joint Steering Committee. Now that market participants are formally asked for input in the context of this ENTSOE consultation, and in view of the future decision NRAs will need to take on the subject, we request clarification on the points mentioned above.



In respect to the past incidents at SDAC (see figure above) very few are – so far – related to algorithm computational time. Most incidents are linked to data exchange and therefore a multitude of mitigation measures can be executed, if sufficient time is available.

Finally, please note that the last 2nd Auction process was run more than 5 years ago (13/11/2016).