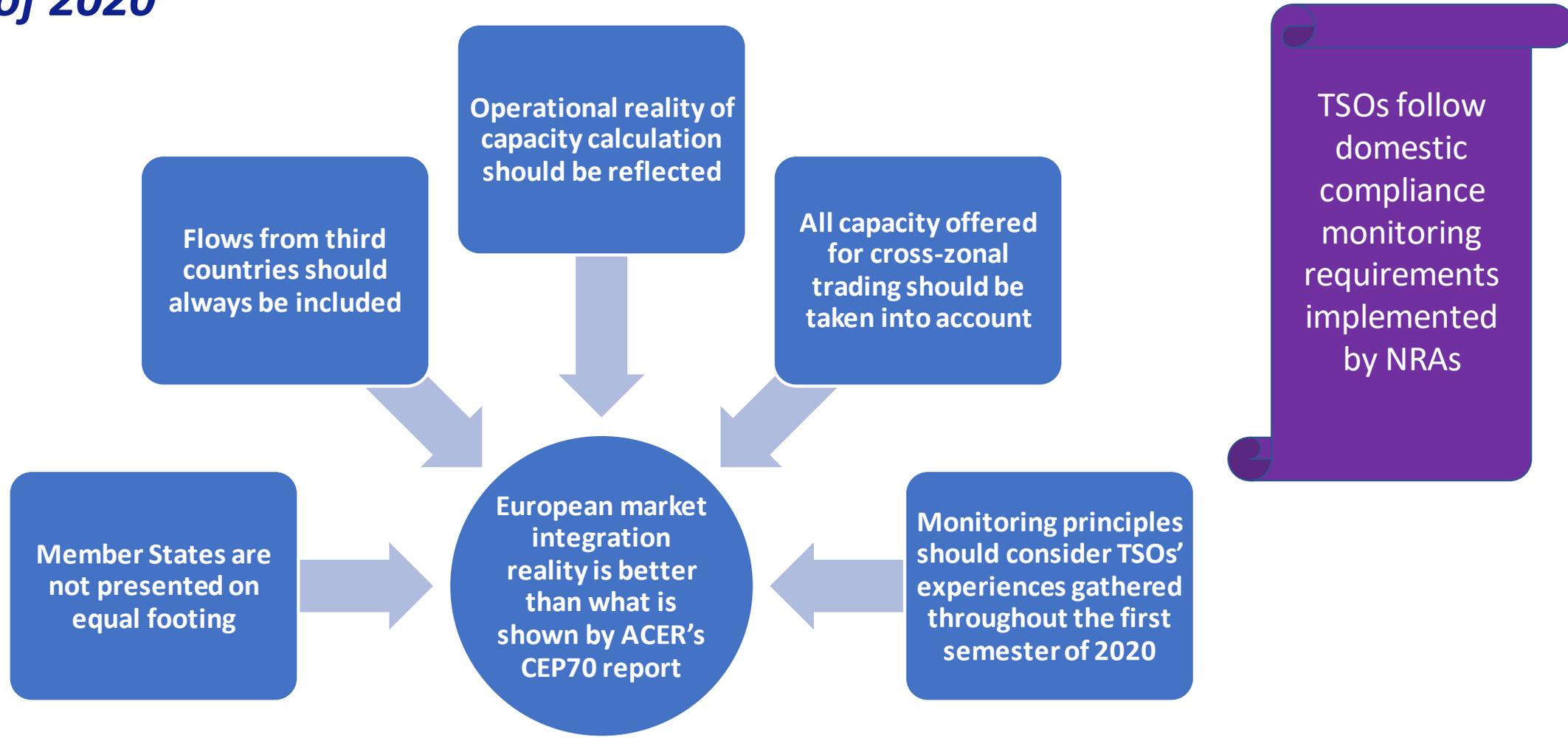


# ENTSO-E highlights key aspects with regards to the implementation of the 70% minimum capacity rule

**Konrad Purchała**  
Chairman, ENTSO-E Market Committee

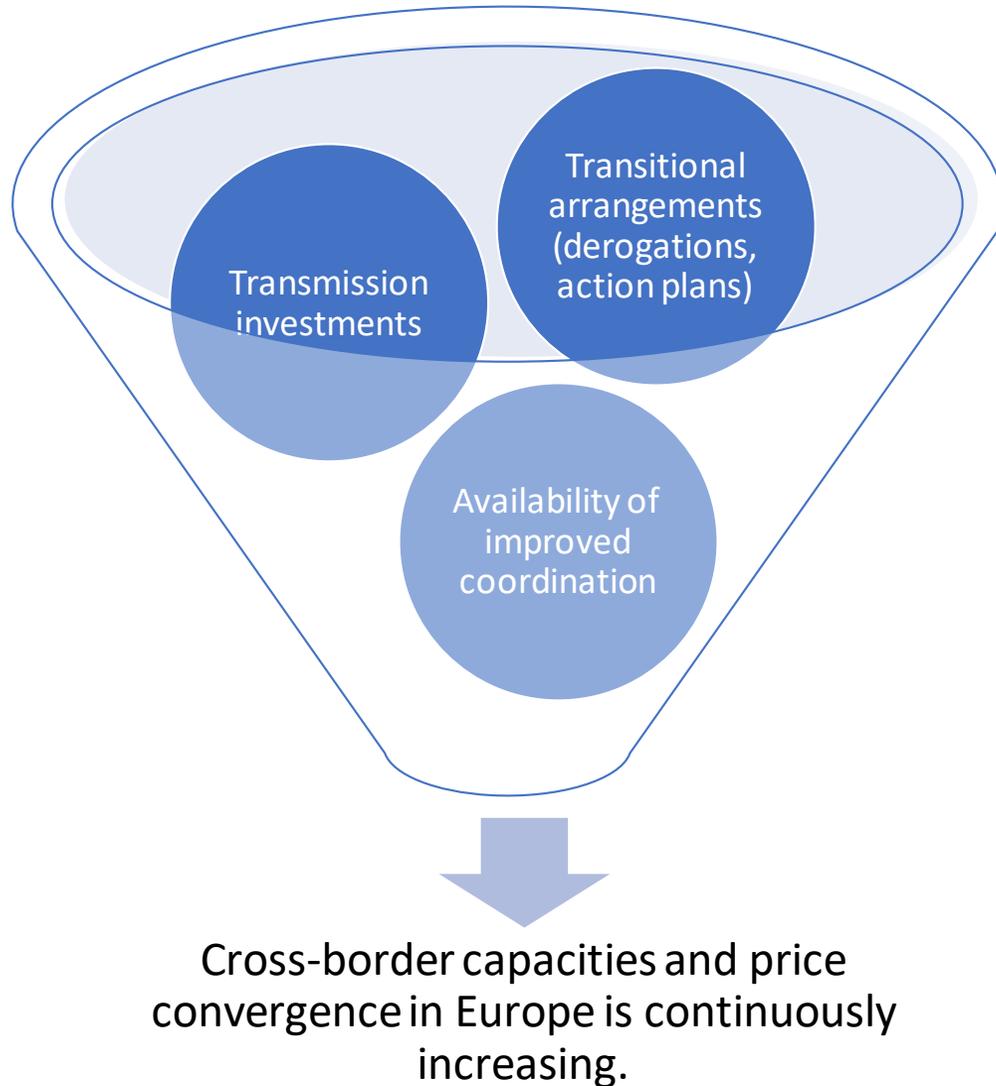
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# ENTSO-E's technical comments on the ACER 'Report on the result of monitoring the margin available for cross-zonal electricity trade in the EU in the first semester of 2020'



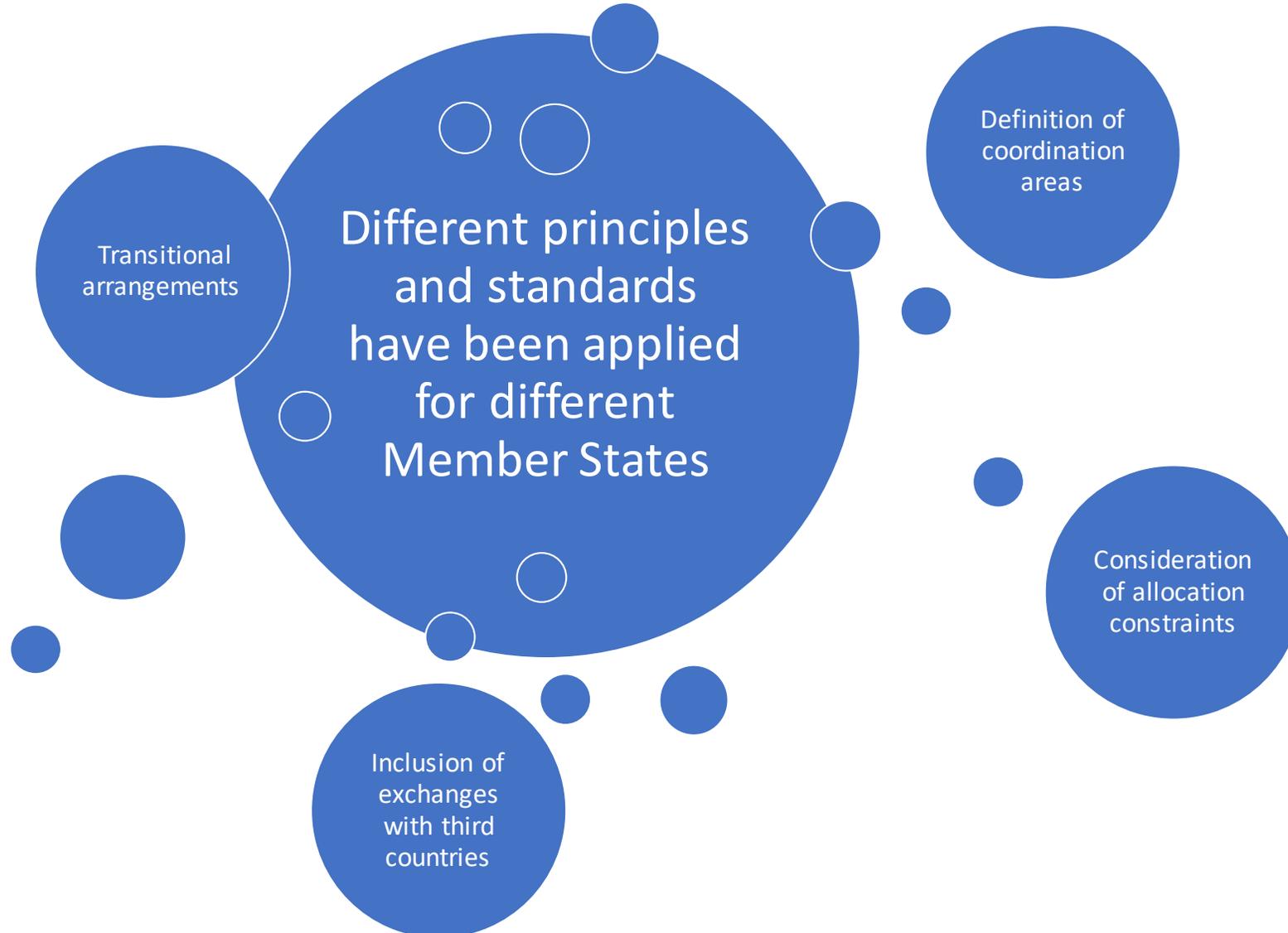
ENTSO-E would like to invite ACER and NRAs to continue the good cooperation and further dialogue on the implementation principles of the 70%

# European market integration reality is better than what is shown by ACER's CEP70 report



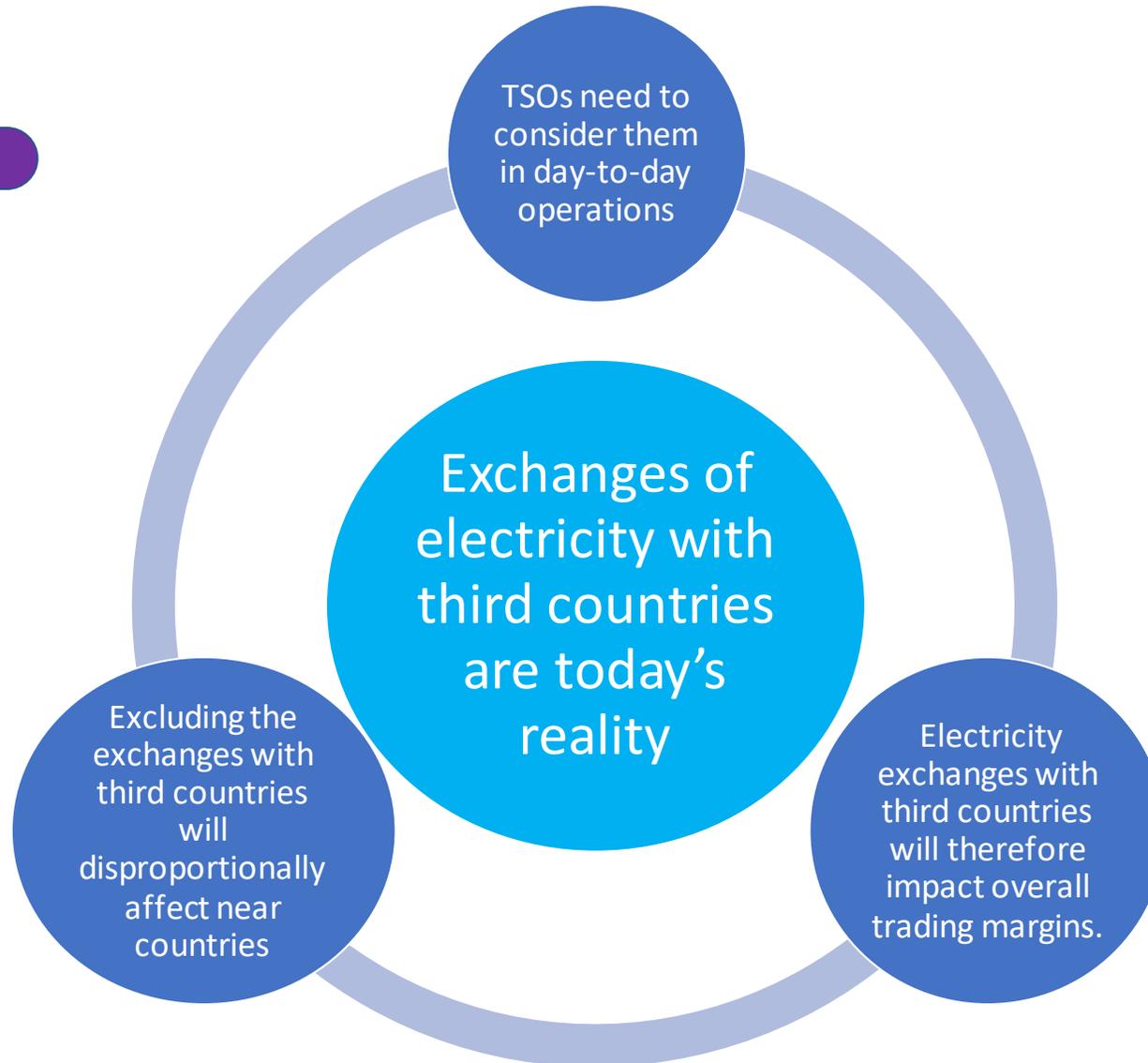
ACER's CEP70 report does not recognize the fact that wholesale prices do converge in an increasing number of hours and that more cross-border capacity during such instances would not have benefited consumers

# Member States are not presented on equal footing

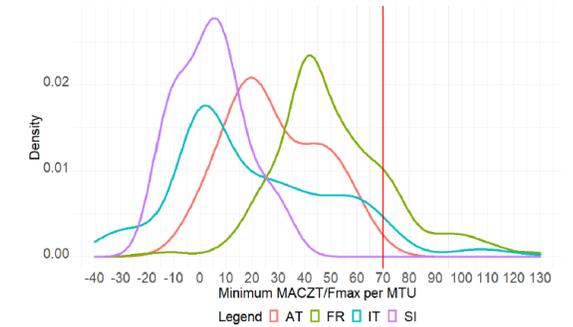


# Flows from third countries should always be included

TSOs are not in charge of setting policy decisions to limit trade with non-EU countries and *have to* accommodate them



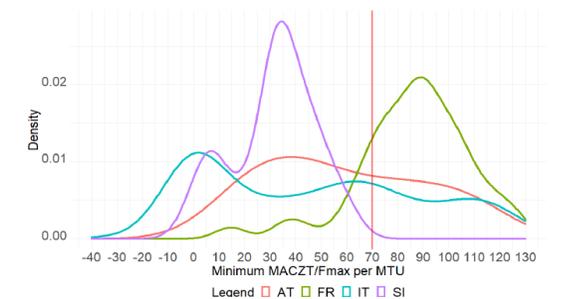
Example: Italy North



Margins **without** considering non-EU Member States



Margins **including** considering non-EU Member States



# Operational reality of Capacity Calculation processes should be reflected

ACER uses exchange schedules that are not available when TSOs calculate capacity

ACER RESULTS:  
One-size-for-all  
framework

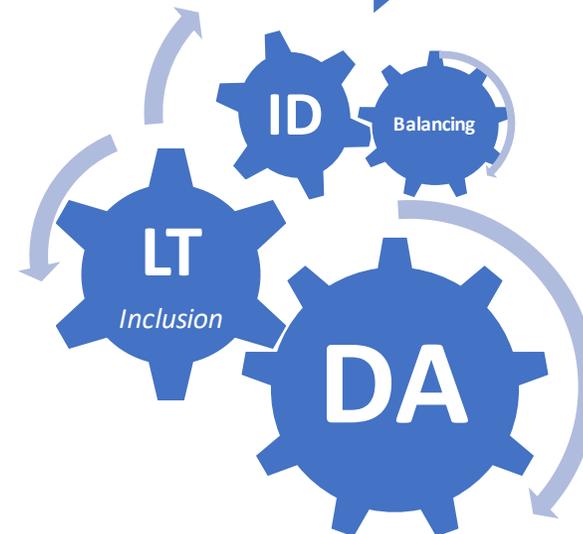
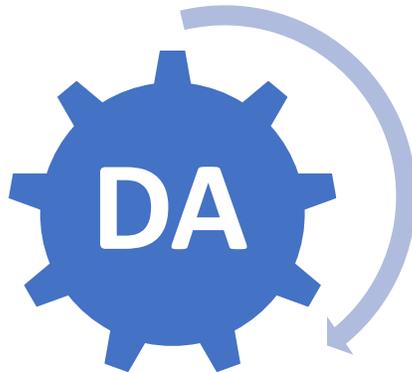
TSOs RESULTS: Day  
to day operations

Comparing the outcome of **TSO operational capacity calculation** processes (ex-ante, executed under uncertainty) with **hypothetical ones** obtained by ACER based on ex-post data does not help improving the clarity of the picture with respect to CEP70.

# All the capacity offered for cross-zonal trading should be taken into account

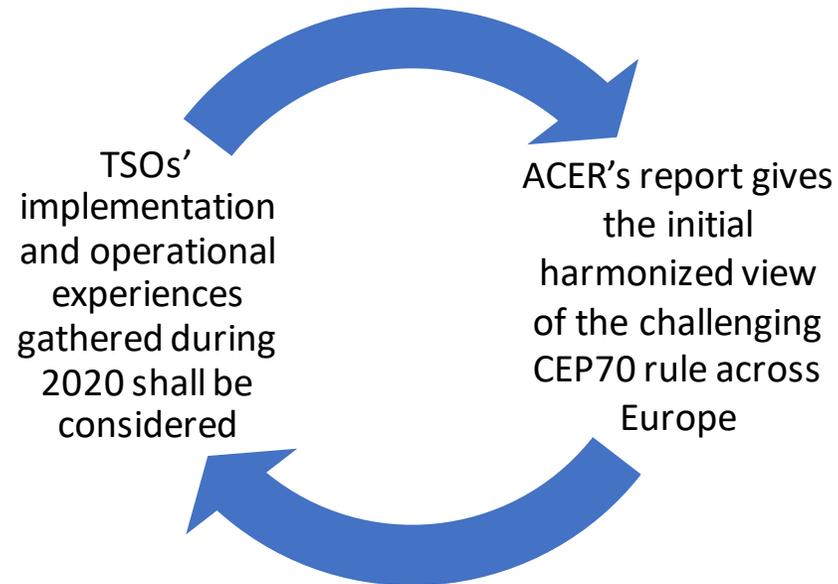
ACER's CEP70 report  
limited to Day-Head  
timeframe

European TSOs offer  
cross-zonal capacity  
in **all** timeframes



# Monitoring principles should consider TSOs' experiences gathered throughout the first semester of 2020

Practical experience from CEP70 operational calculations shall be considered for the future monitoring



Expert dialogue and thorough alignment on CEP70 is needed between TSOs – NRAs – ACER, with special attention to the operational capacity calculation procedures and the legislative provisions of the Clean Energy Package.