

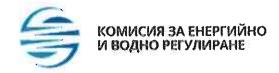
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Mr Christian Zinglersen Director ACER

Cc: Mr Klaus-Dieter Borchardt Director Internal Energy Market Directorate-General for Energy European Commission

Cc: Mr Laurent Schmitt Secretary-General ENTSO-E

Cc: SEE CCR TSOs

Code: O-84251

Athens, 2 October 2020

Subject: Referral to the Agency of the South-East Europe CCR TSOs proposal for common provisions for regional operational security coordination in accordance with Articles 76 and 77 of Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation

Dear Sir,

I write on behalf of the Regulatory Authorities of the South-East Europe Capacity Calculation

Region <sup>1</sup>(hereafter: SEE CCR), with regard to the respective Transmission System Operators (hereafter: SEE TSOs) proposal for common provisions for regional operational security coordination (hereafter: SEE ROSC Proposal) in accordance with Articles 76 and 77 of Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation (hereafter: Regulation 2017/1485).

SEE TSOs submitted the SEE ROSC Proposal in accordance with Articles 76 (1) of the Regulation 2017/1485, which was received by the last Regulatory Authority of SEE CCR on 19 December 2019. The Commission, in their letter from 30 July 2019, took note of the proposed delay and granted a submission by 6 months after the ACER decision on the methodology for coordinating operational security analysis pursuant to Article 75 (1) of Regulation 2017/1485, until 21 December 2019. A decision was therefore required by each Regulatory Authority of the SEE CCR by June 19 2020 according to art. 6 (7) from Regulation 2017/1485.

Article 6(7) of Regulation 2017/1485 requires the competent regulatory authorities to consult and closely cooperate and coordinate with each other in order to reach an agreement and make decisions within six months following receipt of submission of the last Regulatory Authority concerned.

During the consultation process, a few critical aspects like the strong interaction of Article 76 of Regulation 2017/1485 with Article 74 -redispatching and countertrading cost sharing methodology of Commission Regulation (EU) 2015/1222 (CACM) and the alignment with the CORE methodologies according to Article 35 and 74 of CACM for which an ACER decision is expected by October 2020, were highlighted by SEE NRAs.

In view of the above, in 2 October 2020, the Regulatory Authorities of the SEE CCR unanimously agreed to request the Agency to adopt a decision on the TSOs SEE ROSC Proposal, pursuant to Article 6(8) of Regulation 2017/1485.

However, the Regulatory Authorities of the SEE CCR agreed with the general principles of the proposed methodology, and can reasonably envisage to be safeguarded in the final decision. Details on the Regulatory Authorities of the SEE CCR analysis of the SEE ROSC proposal are presented in a separate document attached to this letter. While adopting its decision, Regulatory Authorities of the SEE CCR expect that ACER will give utmost consideration to Regulatory Authorities views on the SEE ROSC proposal.

We remain at your disposal for any further information, clarification and close cooperation in the evaluation of the SEE TSOs proposal by the Agency.

Yours sincerely,

Asst. Prof. Athanasios Dagoumas
President of RAE

<sup>1</sup> Regulatory Authorities of Bulgaria, Greece and Romania

AKPIBEZ ANTIPAGO

ΓΙΩΡΓΟΣ ΘΑΝΟΣ

- (i) Attached Documents: Non-paper of SEE ROSC proposal for common methodology for regional operational security coordination in accordance with article 76 and 77 of Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation
- (ii) SEE ROSC proposal for common methodology for regional operational security coordination in accordance with article 76 and 77 of Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation with the comments by ANRE and the RAE replies and the ANRE second replies.