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# Progressing towards harmonised reporting on the minimum 70% requirement

28<sup>th</sup> MESC meeting – 1 June 2022

# EFET warmly welcomes the ACER/NRAs guidance



We are happy to see the EFET/Eurelectric/IFIEC request of December 2021 led to rapid discussions and close alignment among NRAs and ACER



We believe this will improve visibility for market participants



In the current context, it is also critical to show end-users and decision makers how we make best possible use of existing capacity

# MPs recommendations vs. ACER/NRAs guidance

Reporting methodology		Reporting benchmark	
Market participants' recommendations	ACER/NRAs guidance	Market participants' recommendations	ACER/NRAs guidance
<p><b>Timeframes considered:</b> day-ahead allocation should be the primary focus. If any other timeframe is considered, clear reporting on what exactly is included in the calculation should be made public to avoid any double counting.</p>	 different reporting in DE	<p><b>Compliance with intermediary targets:</b> we consider that derogations or action plans apply as intermediary steps towards the final target of the minimum 70% requirement. Presenting results on the benchmark of applicable derogations and action plans showcases what TSOs are bound to according to the rules approved at national level and could contribute to the compliance monitoring work of NRAs.</p>	 different visuals in FR, DE
<p><b>Timestamps and CNECs considered:</b> according to the Regulation, the minimum 70% requirement should be met for every CNEC in every market time unit. The attainment of the minimum threshold should hence be monitored and reported on all CNECs. An additional sub-KPI could be developed to show the attainment of the minimum threshold on constraining CNECs, in order to assess to what extent non-compliance with the minimum 70% requirement effectively restricts cross-border trade.</p>	 different reporting in FR		 different visuals in DE
<p><b>Allocation constraints accounting:</b> allocation constraints, including capacity reductions before the day-ahead, should be considered as non-allocated capacity. Their use and how they prevent TSOs from reaching the threshold should be publicly reported by the TSOs.</p>	 different reporting in PL		<p><b>Progress towards the requirement of minimum 70%:</b> whichever the intermediary exemptions, progress towards the final target of the Regulation and the goal of increased capacity availability should be tracked and reported.</p>
<p><b>Third countries accounting:</b> the impact of third country flows on capacity calculation and allocation within the EU is a reality. We call for practical arrangements that integrate external EU borders and flows originating from trades with third countries in a cost-efficient calculation and allocation of capacity within EU regions. In the meantime, collecting data and reporting on how the minimum 70% requirement is met both with and without consideration of third countries seems an appropriate way forward.</p>	 different reporting in FR, DE		

# EFET's suggested way forward

- Striving for even closer alignment in the reporting of:
  - All timestamps in France
  - Allocation constraints in Poland
  - Focus on day-ahead in Germany (at least until capacity is recalculated in ID)
- Making sure that the minimum 70% requirement is applied consistently across the EU
  - e.g. exclusion of internal lines (including cross-zonal) from consideration on the requirement by the Swedish NRA
- Ensuring all requested data is made available by the TSOs to ACER and the NRAs

