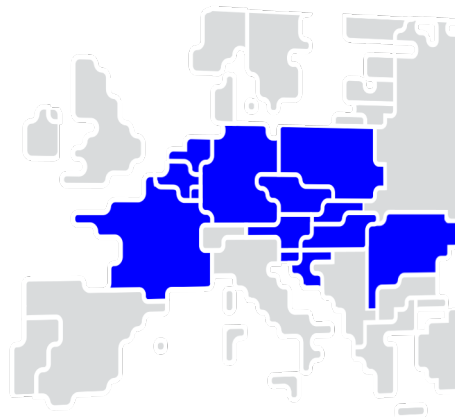




Consultation Report on Core CCR TSOs' Methodology for a market- based allocation process of cross zonal capacity for the exchange of balancing capacity or sharing of reserves in accordance with article 41 of the Commission Regulation on (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing

18 DECEMBER 2019



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GLOSSARY

All definitions and abbreviations of the Core MB CZCA Methodology apply accordingly.

1. INTRODUCTION

This document is the consultation report for the Core TSOs proposal for the Core CCR TSOs' Methodology for a market-based allocation process of cross zonal capacity for the exchange of balancing capacity or sharing of reserves (MB CZCA Methodology) in accordance with article 41 of the Commission Regulation on (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing (EB GL).

Core TSOs would like to thank all parties involved in the public consultation for their interest in the Core MB CZCA Methodology. Core TSOs welcome the feedback received as it is valuable for the further development and detailing of the Core MB CZCA Methodology.

1.1. Public consultation on Core MB CZCA Methodology

Via the ENTSO-E Consultation Platform, the public consultation document for the Core MB CZCA Methodology was available to Core stakeholders from 20 September 2019 until 21 October 2019. In total, eight stakeholders submitted their responses.

Since the public consultation results should be processed in an anonymised manner, the identity of the respondents is not disclosed in this consultation report. Please note that all responses were, however, shared with the Core National Regulatory Authorities (NRAs) in a non-anonymised manner.

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

2. CORE TSOS MB CZCA METHODOLOGY – CONSULTATION FEEDBACK

2.1. Introduction

In this chapter, a summary is provided of all stakeholder responses received via the ENTSO-E Consultation Platform (an overview of the survey questions can be found in the Appendix). All responses are structured in a table showing the stakeholder response, the number of stakeholders providing this response, the action taken by Core TSOs and in addition a Core TSOs' answer to the stakeholders' response.

2.2. General

Some specific feedback was received on the following:

Stakeholder response		# of Stakeholders requesting	Considered action taken	TSOs answer
1	Stakeholders disagree with the concept of CZC allocation for the exchange of balancing and/or sharing of reserves...	1	...	TSOs acknowledge the dissatisfaction of market parties to the concept of CZC allocation, nonetheless also understand that the development of harmonised European markets should not disclose balancing capacity markets ...
2	Stakeholders disagree with the concept of forecasting...	1	...	TSOs acknowledge the inefficiency of forecasting, and have tried to propose the most suitable market-based solution and acknowledge the co-optimisation as the long term solution.
3	Stakeholders disagree with the chosen way of forecasting as not market-based / outcome of market process and TSOs should not do the forecasting.	1	...	TSOs see the choice of previous market results as indication for near future market results as the cleanest, market-based and transparent forecasting tool. TSOs do not consider themselves to forecast the value of CZC, they only operate the forecasting algorithm using inputs taken from actual (previous) market-results.
4	Forecast of CZC between	1	...	TSO acknowledge the unfortunate

	Bidding Zones			forecast of CZC due to market-based allocation. Since co-optimisation requires an implementation process requiring implementation timeline, the market-based, even with forecasting, is an alternative TSO do not want to disregard
5	Stakeholders question whether the same capacity procurement optimisation function of co-optimisation is used	1	...	The balancing capacity procurement optimisation function is defined per BCC however shall have for all BCCs the same objective according to EBGL Art.58.3. Since each the optimisation functions are not centrally operated for market-based and economic efficiency, Core TSOs cannot guarantee that all European capacity optimisation functions are identical. At least for Core and Co-optimisation they are based on the requirements of the two methodologies.
6	Any reservation of capacity for the purpose of exchange of balancing capacity and sharing of reserves needs to be justified on a per border basis by TSOs and approved by the corresponding NRAs	1	...	Core TSOs have tried to include more justification for cost benefit proof for each (new) cooperation and the transparency on this, please see article 3.2 of our methodology.
	a regular assessment of the need to reserve capacity for balancing purposes should be performed .	1	Action taken	Acknowledged, Core TSOs of each BCC shall monitor, demonstrate and publish the efficiency of forecasting and appropriateness of the choice of reference periods and adjustment factors according to Article 7.8 of the MB CZCA methodology.
7	The proposed mechanisms and	1	See response	Core TSOs have included the possible application of further

	<p>formulas to apply, for both the forecasted market value of (a) CZC for exchanging energy (SDAC) and likewise for (b) the exchange of balancing capacity or sharing of reserves between bidding zones, can frequently be of rather poor quality because for (a) it is difficult to find a stable reference period from SDAC to use and for (b) there will at the time of selection of CZC allocation to energy (spot) or to (balancing) be very limited balancing bids/offers given by market players and accordingly the forecasted value of allocation of CZC in favour of balancing may easily appear to be much larger than reality...</p>			<p>limitations on the allocation of CZC for balancing capacity markets and the application of adjustment factors to improve efficiency of forecasting. The requirement for each BCC to monitor, demonstrate and publish the efficiency of forecasting and appropriateness of the choice of reference periods and adjustment factors according to Article 7.8 of the MB CZCA methodology aims to support the request from stakeholders.</p>
8	<p>As the transmission capacity reserved by the TSOs through the "market-based" allocation process would be used by the TSOs themselves for the exchange of balancing capacity or the sharing of reserves, we would welcome a clear statement by the TSOs</p>	1	See response	<p>Core TSOs would like to highlight that CZC allocated will be used by the balancing capacity market, not only the TSOs. The EBGL is clear on a future competition on CZC in the timeframe of SDAC by the DAM and the balancing capacity market. The moment the timeframe of SDAC receives 70%, an outcome of the CZC optimisation can result in 69% to the DAM and 1% to the balancing capacity market.</p>

	that this capacity will not be counted within the minimum 70% threshold			
9	Stakeholder does not see how the “market-based” process could be applied in a FBDA environment	1	See response	TSOs acknowledge the challenge of allocation of CZC to balancing capacity without firm (balancing) energy net positions, especially for the co-optimisation process. Nonetheless, for the market-based and economic efficiency process, CZC allocated to balancing capacity is possible. Any additional uncertainty shall not be captured in the reliability margin, but would be captured by the balancing capacity market, implying that the market value of balancing capacity would reduce and less CZC is allocated to balancing capacity.

2.3. Methodology

Feedback on Article 1 – Subject matter and scope

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1 The TSOs have not provided evidence that the present methodology would not actually violate the principles of articles 3.1.d and 3.2.e EB GL.	1	See response	Core TSOs have redesigned the entire proposal by further and stricter requirements and rewrote the whereas section.
2 Paragraph 1.7 is partially repeated in article 3.9 and 11.2. Please make sure the text of the methodology does not reiterate the same rules multiple times. ...	1	See response	TSOs have taken action but like to stress out that completeness per Article has priority even on the expense of repetition.

Feedback on Article 2 – Definitions

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1 ...	#

Feedback on Article 3 – Principles of each balancing capacity cooperation within the CCR Core applying the market-based methodology

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1 Based on the draft proposal, methodology can be applied even before the go-live of balancing energy platforms. It is unclear how standard balancing capacity products, which are based on standard balancing energy products, can be	1	See response	Each balancing capacity cooperation requires also balancing energy cooperation with harmonised balancing energy products to be exchanged accordingly. The moment PICASSO, MARI, and TERRE are not yet implemented, each BCC shall have its own balancing energy cooperation in place....

	used, if balancing energy products will be introduced only with the go-live of European platforms...			
2	Core TSOs should ensure full transparency in the implementation process (e.g. the cost-benefit analysis mentioned in Article 3(1) should also be shared with market parties and not only among TSOs), and market parties should be given sufficient time to adapt their IT and operational processes....	1	Methodology has been changed accordingly ¹	Acknowledged, more transparency will be given
	CBA must be shared with BSPs and not only among TSOs	1	Action taken	Acknowledged, results shall be shared on ENTSO-E
	(6) & (7) refers to the undefined terms “minimum contracting period” and “minimum validity period”. A clear definition of those two terms would be welcome	1	Action taken	Acknowledged, please also see the methodology on standard product balancing capacity
	(10) refers to an “implementation methodology of the Balancing Capacity Cooperation” including fallback and curtailment procedures according to article 38 of EBGL. Nevertheless, article 38 of EBGL does not mention this methodology	1	No action	Article 38 of EBGL relates to the application methodology in case BCC will apply Art. 40, 41 or 42. All TSOs are aware/have committed for each BCC to commit to Art. 38 when starting a BCC applying Art. 40, 41 or 42.
	Review the reference to the	1	Action taken	Acknowledged

	correct EBGL article, if any			
	More generally, all this article 3 should be in the “implementation methodology of the Balancing Capacity Cooperation”, and not in the CZCA methodology	1	No action	Core TSO have chosen to keep Article 3 to make common rules applicable for all BCCs. Including rules per BCC would leave more room for non-harmonisation.
	Stakeholder misses a number of requirements to ensure the proper use of the CBA: <ul style="list-style-type: none"> - the CBA shall also be distributed to CORE NRAs and market participants - the decision to establish a BCC shall be excluded unless the CBA is positive - the relevant NRAs’ decision to approve or not a BCC shall take account of the results of the CBA 	1		Further requirements on transparent publication have been included by Core TSOs Decision on continuation of a BCC is the choice of the TSOs and NRAs of each BCC.
	Besides, we miss in this methodology the regular assessment to be performed by TSOs with regard to the continued necessity or not of a BCC according to article 38.8 EB GL	1		TSOs have included the requirement on regular assessment see Article 7.
	Article 3.10 refers to an “implementation methodology of the Balancing Capacity Cooperation” including	1	Proposal changed	Acknowledged, with this methodology, the methodology on application is ment, to be developed by each single BCC.

	<p>fallback and curtailment procedures according to article 38 EB GL. However, article 38 EB GL does not mention this methodology. Please review the reference to the correct EB GL article</p>			
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Feedback on Article 4 – Notification process for the use of the market-based allocation process

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer	
1	<p>Stakeholders would welcome the involvement of further stakeholders, in particular market participants, in order to provide transparency to the forecasting technique, being the core of the market-based analysis</p>	5	See answer	<p>All-CORE TSOs acknowledge the feedbacks provided by stakeholders. CORE TSOs willing to implement a BCC cooperation based on market-based methodology will organise a public consultation, according to articles 5(3)(b) and 10(4) on the proposal for the establishment of common and harmonised rules and processes for the exchange and procurement of balancing capacity, according to Articles 33(1).</p>
2	<p>Informing stakeholders 1 month prior to start of the cooperation is rather late. Further, with other CORE TSOs possibly providing remarks up until one month before application of the methodology, this leaves less than one month of notice (also taking into account the time needed for the relevant TSOs to implement comments for other CORE TSOs) for the application of the method with certainty about its content. We believe this timing is too ambitious for a proper communication to and preparation of market participants.</p>	5	Update of the article	<p>All-CORE TSOs understand the time required to adapt processes and IT systems and would like to emphasize that the one-month notification period is a minimum period at the end of a long process where stakeholders will have been involved. Before that, CORE TSOs willing to implement a BCC cooperation based on market-based methodology will organise a public consultation, according to articles 5(3)(b) and 10(4) on the proposal for the establishment of common and harmonised rules and processes for the exchange and procurement of balancing capacity, according to Articles 33(1).</p>

3	Are timings mentioned in Article 4.1 cumulative (i.e. first notification to all TSOs of the synchronous area 6 months before application) or concomitant (both notifications happening at the same time)?	1	See answer	The timings are not cumulative and can be concomitant
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Feedback on Article 5 – Timeframe of market-base allocation

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer	
1	In article 5(1)(a) the sentence “sufficiently before sending the final results of the capacity calculation for CZC of the SDAC to NEMOs” is too vague	1	No adaptation of the text	A concrete timing was not proposed because it will depend on the specificities of each balancing capacity cooperation. This article gives the general guidelines to make sure that the NEMOs will have enough time to take the allocated CZC into account.
2	Stakeholders mention that article 5(1)(c) opens the possibility to have different TSO-BSP GCTs for different balancing capacity standard products. They wonder how the CZC optimization function is supposed to work if some of the balancing capacity bids are not firm.	1	No adaptation of the text	The balancing capacity bids are expected to be firm even if there are different GCTs for different products. In case an optimization wants to consider different products, then the optimization for products with earlier GCT will have to make some assumptions of the expected value of the other product.
3	Stakeholders wonder which CZC domain will be used as an input for the optimization function.	1	Article 5(2)(c)(iv) has been adapted accordingly	The latest available domain will be used.
4	Error in article 5(1)(d)	2	Article 5(2) has been adapted	Error corrected
5	Clarification related to article 5(2)(c).	1	Article 5(2) has been adapted	Error corrected
6	Article 5(2)(e) is redundant to 5(2)(c).	1	Article 5(2) has been	Article 5(2)(e) now talks about a CMOL

			adapted	of accepted bids
7	Stakeholders demand an additional requirement stating that the calculation of the CZCA must not take longer than selecting bids without using a BCC.	1	No adaptation of the text	Since the cross border optimization of selection of capacity bids is a more complex process that a local selection, the TSOs could expect that it may not take the same time. However, the timing described in Article 5 ensures enough time for BSPs to bid in other products and also NEMOs to take into account the CZCA for balancing.

Feedback on Article 6 – Process to define the maximum volume of allocated cross zonal capacity for the exchange of balancing capacity or sharing of reserves

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1 Under Article 6(5) of the proposal, Core TSOs and Core NRAs of each BCC may commonly apply additional limits besides the limitations of Article 41(2) EBGL for the maximum volume of allocated CZC. Given that any additional limits must not contradict EBGL, we wonder which reasoning would be applied to introduce such additional limits.	2	See answer	CORE TSOs acknowledge the answer. It is a possibility given to the future balancing capacity cooperations. The concept is also in line with the article 39(6) of the EBGL.
2 Especially in situations where the available cross-zonal capacity is reduced due to maintenance or outage or other causes, price-formation between the bidding zones is already affected and likely to be sensitive to further changes in availability of capacity and cross-zonal capacity. In this situation the forecast of value of CZC can be challenging to forecast and thus should be allocated to	1	See answer	CORE TSOs acknowledge the point mentioned. This possibility can be detailed in the proposition for a BCC and is in line with article 6(5). No restriction is mentioned in this specific case in the EBGL. However, the result of the allocation will be done based on a calculation of market value. Therefore, the tension will be taken into account.

	the SDAC and SIDC and not reserved for balancing and exchange of reserves purposes.			
3	Can you justify the Y-2 1.11 to Y-1 31.10 period that is considered under (2)? This is not clear how the maximum value will be updated along time. Will that be done each year?	1	Update of the article	The period mentioned in article 6(2) has been updated with “the previous calendar year”, in coherence with the EBGL. The value will be updated each year based on the values of the previous calendar year.
4	Process to define maximum cross-zonal capacity used for the exchange or sharing of balancing capacity or reserves is not explained at all. Article 41 EB GL sets maximum possible allocation of cross-zonal capacity – not the exact number, which should be used as a cap. It is unclear, how the maximum capacity will be set in the end – or whether it will only copy requirements of EB GL.	1	See answer	CORE TSOs have updated the article to clarify what will be the reference and the period used for the reference. CORE TSOs confirm that the 10% is a limit, which will be used as a cap. The additional limit can only be lower than the maximum set in the EBGL.
5	It should be clearly stated the 10% are applied over CZCA for all of the balancing processes, not 10% for each of aFRR, mFRR and RR, possibly summing up to 30%.	1	See answer	CORE TSOs confirm that the 10% are for all the balancing processes using the market based methodology, if the contracting is more than two days in advance of the provision of the balancing capacity (see article 41.2 of the EBGL)
6	We would welcome a clearer wording that individual BCCs can set only a lower threshold than the maximum 10% of available cross-zonal capacity referred to in article 41.2 EB GL.	1	Update of the article	The article has been updated to clarify that point.
7	MPP would welcome a reference and an interpretation of the second	1	See answer	CORE TSOs confirm that the article apply as the contracting timing is not yet

	<p>paragraph of article 41(2). The contracting timing being not set yet (cf. art 5(1.a) of this proposal), this article can still apply.</p>			set.
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Feedback on Article 7 – Determination of the forecasted market value of cross zonal capacity for the exchange of energy

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer	
1	Method for forecasting shall be explained with additional details (reference period and adjustment factors).	5	<p>Included reference to shadow prices as well as details on reference period, allowed option to use better forecast techniques (see response 2)</p>	<p>TSOs added details on the reference period. However, the proposal shall allow future BCCs to choose the best method for forecasting, depending on the availability of data, market timeframes, particular requirements of market participants, etc. The same holds for the choice of adjustment factors. BCCs will specify the exact forecasting method including their choice of adjustment factors (if applicable) in the proposals for implementation of a BCC according to Art. 33 EBGL.</p>
2	Using forecasted market values, especially when the forecasts are based on historical data, is inherently inaccurate and may lead to an inefficient allocation of cross zonal capacity.	7	<p>Included provision in Art 7 (7) regarding analysis of efficiency of forecasting.</p>	<p>TSOs agree that forecasting market values includes the risk of inaccurate results. Hence, TSOs provide for the possibility to use adjustment factors in order to improve the forecast accuracy. Additionally, Art 7 (8) of the Proposal states that forecasting shall be monitored and improved when necessary, e.g. by choosing different reference periods, adjustment factors, or forecasting techniques (e.g. econometric methods in order to identify the best set of explanatory variables or market indicators like e.g. forward prices).</p> <p>Per se, forecasting the market values does not necessarily favor the</p>

				balancing market, in particular in the market-based method where actual balancing capacity bids are used for comparison.
3	Forecasted market values as well as optimization results shall be published frequently and their derivation and monitoring shall be transparent.	3	Changed publication to publication on ENTSO-E website and included NRAs for monitoring in Art 7 (8)	TSOs deem the publication on an ENTSO-E website sufficient to fulfil this requirement. However, as the publication of forecasted market values may contain or allow to infer confidential information regarding other market participants' actions, TSOs refrain from publishing this particular information, in particular on a continuous basis. However, the monitoring of the forecasting as well as the optimization results explicitly also includes NRAs.
4	Check reference to Art 37 (2) CACM GL in Art 7 (1) of the Proposal.	2	Reference adjusted	TSOs agree and propose to replace the reference with Art 39 (5) of the EBGL
5	Add "and vice versa" to Art 7 (5) of the Proposal.	1	Wording proposal "and vice versa" included	TSOs agree as adjustment factors shall be used to improve forecast, not to give preference to a market.
6	Unclear, how forecasting market values can take into account the negative effect of a potential reduction of CZC from CDAC on different network elements (Flow-Based Calculation).	1	Delete "negative"	TSOs shall be able to include the effects of an allocation of CZC in the flow-based capacity calculation in the forecasting of market values. However, TSOs agree that this inclusion shall be neutral regarding the effects.
7	The value of CZC for the intraday-market shall be included when forecasting the market value of CZC for the exchange of energy.	1	No action	As described in the ED, the forecasting of the market value of CZC for the Intraday market additionally introduces uncertainty into the optimization which will render the forecasted market values of CZC for the exchange of energy even more inaccurate. Also, TSOs would need to

				forecast CZC available for the intraday market which is determined in particular by the SDAC results. For these reasons, TSOs refrain from including the intraday market in the forecasting of market values for the exchange of energy.
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Feedback on Article 8 – Determination of the actual market value of cross zonal capacity for the exchange of balancing capacity of sharing of reserves

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1 ...	#

Feedback on Article 9 – Determination of the allocated volume of cross zonal capacity for the exchange of balancing capacity or sharing of reserves

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1 Contradiction of Article 9 (2) to Article 5 (2) c-e of the Proposal.	1	No action	Article 5 (2) defines steps in the process but does not state the sequence. This is done in Art 9. Hence, the provisions do not contradict each other.
2 More details necessary under which circumstances additional thresholds/margins can be introduced according to Art. 7 (7) of the Proposal.	1	No action	TSOs agree but refrain from exhaustively including reasons for applying additional thresholds or margins as this may unduly restrict NRAs as well as TSOs in the future.
3 The forecasting of energy market value may deviate from real behaviour of market participants and hence distort the calculation of the market value (as does not including the intraday market).	1	No action	TSOs would like to refer to response No. 7 regarding Article 7 above.

Feedback on Article 10 – Pricing of cross zonal capacity

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
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1	It is unclear, whether the price of capacity would be calculated separately only for downward and upward direction of all balancing capacity products (i.e. 2 calculations), or separately for each balancing capacity product (i.e. 6 calculations).	1	No action	The market value calculation is calculated for each product in each direction, so 6 market values if aFRR, mFRR and RR are taken into account...
2	It is unclear, whether the TSOs of BCC cooperation can use different methods of pricing of balancing capacity (i.e. decide whether to use pay-as-bid or pay-as-clear). We consider that for preservation of level-playing field among market participants, TSOs should agree on one method only. Otherwise there is a risk of a discriminatory treatment of BSPs providing identical service to one (or the other) TSO	1	Methodology has been changed	The methodology has been changed, marginal pricing for balancing capacity is chosen as target. Each BCC shall have the same pricing rules to ensure level playing field.

Feedback on Article 11 – Firmness regime of cross zonal capacity

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	1	No adaptation of the text	When the EU balancing platforms see not demand from the TSOs that have reserved CZC, they shall use this capacity to cover the demand of the other TSOs. The exact details shall be specified by the EU balancing platforms.

	associated exchange of balancing energy for the same product”			
2	More info on the “holder of the allocated capacity” is requested	1	Text adapted accordingly	
3	Article 11(2) is repeated in other articles	1	Text adapted accordingly	

Feedback on Article 12 – Sharing of congestion income from cross zonal capacity

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1 ...	#

Feedback on Article 13 – Implementation timeline

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	

Feedback on Article 14 – Publication

Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1 To Article 13 (3): The stakeholders do not understand why TSOs would wait to publish information (up until six hours) and ask TSOs to publish the information on allocated cross-zonal capacity together with the results of the capacity procurement process, according to the same timing as set out in Article 13 (2) of the proposal.	2	Wording has been adjusted	In the text, the TSOs added "as soon as possible". The process takes time, and there may be difficulties during the process, so this period includes a safety buffer. But this period is trying to reduce this to a minimum, which should succeed in most cases. The same applies to Article 13 (2).
2 Article 13 (7) requires TSOs	1	Wording has been	The TSOs have added the following supplement: "... to their respective

	to publish the efficiency of the forecasted market values. However, in order to improve transparency Stakeholder ask TSOs to also publish the forecasted market values as soon as possible.		adjusted	NRAs and market participants to analyse the forecast efficiency."
3	To Article 13 (3): The reference to article 5(1.a) of this proposal seems not relevant as not related to publication elements.	1	No adaptation of the text	However, the reference to the time frame of the allocations is not wrong and therefore uncritical in content.
4	To Article 13 (7): Stakeholder would like to see such a publication every year in line with the feedback process proposed under the article (7.7) of this proposal.	1	No adaptation of the text	The provisions regarding publication stated in article 7.7 of this proposal are more specific. However, TSOs decided to keep both paragraphs for the sake of completeness.
5	To Article 13 (3): If the cross-zonal capacity allocation process for the exchange of balancing energy or sharing of reserves is completed at the time of the balancing capacity procurement process in the case of the "market-based" approach, it is unclear why CORE TSOs participating in a BCC would wait to publish information on allocated cross-zonal capacity for the exchange of balancing energy / sharing of reserves only six hours before its use. For the sake of transparency, this	1	No adaptation of the text	Article 13.3 of this proposal contains the deadline set forth by Article 12.3.h of the EBGL. As this is just the final point in time when TSOs shall publish the results of the cross-zonal capacity allocation, TSOs of a balancing capacity cooperation within the CCR CORE may opt to publish this information earlier, e.g. also together with the results of the capacity procurement process.

	information should be published together with the results of the capacity procurement process, according to the same timing as laid down in article 13.2.			
6	To Article 13 (6): It shall never be the task of a TSO to decide whether market abuse has been committed, nor to restrict market design or disclosure of price sensitive information on the basis of a fear of such market abuse materialising.	1	No adaptation of the text	The article contains provisions set forth in Article 12.4 of the EBGL which clearly states that TSOs may withhold the publication of information for reasons of market abuse concerns, subject to the approval pursuant to Article 18 of the EBGL.
7	To Article 13 (7): TSOs should publish the forecasted market values on a continuous basis (with as little of a delay as possible) and not only the efficiency of the forecasted market values as currently set out in article 13.7.	1	No adaptation of the text	As the publication of forecasted market values may contain or allow to infer confidential information regarding other market participants' actions, TSOs refrain from publishing this particular information, in particular on a continuous basis.

Feedback on Article 15 – Language

	Stakeholder response	# of Stakeholders requesting	Considered action taken	TSOs answer
1	...	#