

All interested parties,
stakeholders in GB and beyond,
and other regulatory bodies

Direct Dial: 020 7901 0532
Email: david.hall@ofgem.gov.uk

Date: 14 March 2019

Dear colleague,

Approval of the amended all TSO methodology for calculating scheduled exchanges resulting from single intraday coupling

On 30 November 2018, we¹ received an amended proposal from GB Transmission System Operators (TSOs) in accordance with Article 56 of the guideline on Capacity Allocation and Congestion Management (the CACM Regulation²). The proposal was submitted to us by the relevant GB TSOs in line with our assignment of obligations.³

This letter sets out our decision to approve the methodology for calculating scheduled exchanges resulting from single intraday coupling (the Methodology) pursuant to Article 9(12) of the CACM Regulation. The letter furthermore outlines the necessary next steps that must be taken.

Background

According to Article 2(32) of the CACM Regulation, a scheduled exchange is an electricity transfer scheduled between geographic areas, for each market time unit and for a given direction.

The objective of the Methodology for intraday coupling is to describe the calculation of the intraday electricity exchange schedule, and list the information to be provided by the relevant NEMOs to the scheduled exchange calculator, as well as the time limits for delivering this information if relevant. The scheduled exchange calculation is to be based upon net positions for each market time unit.

¹ The Gas and Electricity Markets Authority. Ofgem is the Office of the Authority. The terms "Ofgem" and "the Authority," "we" and "us" are used interchangeably in this letter.

² Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management the CACM Regulation came into force 14 August 2015. It aims to maximise the efficient use of interconnection and facilitate greater cross-border electricity trade, through market coupling in the day-ahead and intraday timeframes. Market coupling should make sure power is produced where it is most efficient and used where it is most valued, to lower prices for consumers and support secure and sustainable supply.

³ See TSO decision letter here: <https://www.ofgem.gov.uk/publications-and-updates/decision-our-consultations-assignment-transmission-system-operator-obligations-under-capacity-allocation-and-congestion-management-regulation-within-gb>

The CACM Regulation requires the competent Regulatory Authorities to consult, closely cooperate, and coordinate with each other in order to reach an agreement⁴ and take decisions within two months following receipt of an amended proposal by the last regulatory authority⁵. The last Regulatory Authority received the amended Methodology on 14 December 2018. A decision on the proposal was therefore required by 14 February 2019.

However, all TSOs acknowledged that the Methodology contained some editorial errors, which they decided to correct by voluntarily providing an updated version of the proposal to NRAs. Due to TSO procedures, these corrections could only be submitted to NRAs by 8 February 2019 at the earliest. NRAs agreed on the scope and importance of these corrections. From a procedural perspective however, NRAs needed more time to conclude their respective national decisions after the receipt for the voluntarily corrected version. This would therefore not allow NRAs to reach the deadline of 14 February 2019.

All NRAs consequentially requested ACER to grant them a one-month extension under Article 8(1) of Regulation (EC) No 713/2009⁶ in order to be able to respect the necessary procedural steps and approve the corrected methodology at a national level. ACER agreed to grant such an extension on the 4 March 2019. A decision on the proposal is therefore required by 14 March 2019.

Our Decision

In our original decision, we requested various amendments to the Methodology. In short, the requested amendments aimed at:

- i. gaining clarification that the calculation of scheduled exchanges between scheduling areas is only performed between scheduling areas where at least one NEMO operates;
- ii. expanding the description of the calculation of scheduled exchanges between bidding zones and scheduling areas to reflect the links to the scheduled exchanges between NEMO trading hubs;
- iii. the inclusion of an additional Article covering the calculation of scheduled exchanges between NEMO trading hubs; and finally
- iv. general amendments with regards to the formatting of the proposal and consistent use of defined terms throughout.

We have reviewed the proposal submitted to us in line with the requirements of the CACM Regulation, the wider objectives of the Regulation (EC) No 714/2009⁷ and our statutory duties and obligations. We consider that it satisfies the requested amendments and has improved transparency. As required by Article 9(10) of the CACM Regulation, we have consulted, and closely cooperated and coordinated with other Regulatory Authorities in order to reach an agreement on these proposals. All Regulatory Authority agreement for the proposal was reached on 8 February 2019. This agreement is attached as an annex to this decision letter and constitutes the reasons for our decision. In line with the all Regulatory Authority agreement we hereby approve the Methodology.

Decision not to undertake an Impact Assessment

We have not undertaken an impact assessment for this proposal. This is because the proposal is limited in scope and does not constitute a significant change to existing requirements and arrangements for the calculation of intraday electricity exchange schedules. The adoption of the Methodology is furthermore a requirement of the CACM Regulation, which has already

⁴ Article 9(10) of the CACM Regulation.

⁵ Article 9(12) of the CACM Regulation.

⁶ Regulation (EC) No 713/2009 of 13 July 2009 establishing an Agency for the Cooperation of Energy Regulators here:

<https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32009R0713>

⁷ Regulation (EC) No 714/2009 here:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0015:0035:EN:PDF>

been subject to an impact assessment. Accordingly, we consider that an impact assessment is unnecessary.

Next Steps

In accordance with Article 9(14) of the CACM Regulation, the relevant TSOs must publish the Methodology on the internet, and must meet the implementation deadline required under Article 5 of the Methodology, following the approval by the last competent regulator.

If you have any queries regarding the information contained within this letter, or the All Regulatory Authority agreement in the annex, please contact Holly MacDonald at Holly.MacDonald@ofgem.gov.uk.

Yours faithfully,

David Hall,
Head of European Markets, Wholesale Markets & Commercial