



**NVE**  
The Norwegian Energy  
Regulatory Authority – RME

**Authority for  
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Forsyningstilsynet



Bundesnetzagentur



**REQUEST FOR AMENDMENT (RfA)  
BY ALL RELEVANT REGULATORY AUTHORITIES OF  
THE HANSA CAPACITY CALCULATION REGION**

**OF**

**THE CCR HANSA TSOs' AMENDMENT PROPOSAL  
FOR THE COORDINATED REDISPAThing &  
COUNTERTRADING COST SHARING METHODOLOGY  
IN ACCORDANCE WITH ARTICLE 74 OF COMMISSION  
REGULATION (EU) 2015/1222 OF 24 JULY 2015  
ESTABLISHING A GUIDELINE ON CAPACITY  
ALLOCATION AND CONGESTION MANAGEMENT**

**30 September 2020**

## I. Introduction and legal context

This document elaborates an agreement of all relevant Capacity Calculation Region (“CCR”) Hansa Regulatory Authorities, reached on 30 September 2020, of the all Hansa TSOs’ amendment proposal, dated 14 August 2019, for the present CCR Hansa Coordinated Redispatching & Countertrading Cost Sharing Methodology, hereafter referred to as “the RCCS Methodology”.

ACER decision 04-2019 of 1 April 2019 did allocate the bidding zone border, Western Denmark (DK1) - Netherlands (NL), to CCR Hansa.

The all CCR Hansa TSOs (“Hansa TSOs”) are therefore the German TSOs, TenneT TSO GmbH and 50Hertz Transmission GmbH, the Dutch TSO, TenneT TSO NL BV, the Danish TSO, Energinet, the Swedish TSO, Svenska kraftnät, and the Polish TSO, Polskie Sieci Elektroenergetyczne S.A. The Hansa TSOs cooperate with the Norwegian TSO, Statnett, on the development of the regional terms, conditions, and methodologies, which the Hansa TSOs are obliged to submit for regulatory approval.

The all CCR Hansa Regulatory Authorities (“Hansa NRAs”) are therefore Bundesnetzagentur (“BNetzA”), Autoriteit Consument & Markt (“ACM”), Danish Utility Regulator (“DUR”), Energimarknadsinspektionen (“Ei”), and Urząd Regulacji Energetyki (“URE”). However, the views of Reguleringsmyndigheten for energi (“NVE-RME”) have been acknowledged in the process.

The Hansa TSOs had originally developed a proposal for the CS Methodology pursuant to Article 74 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management (“CACM GL”).

On 28 January 2019, the Hansa NRAs did reach an agreement to approve the Hansa TSOs’ proposal for the RCCS Methodology in an amended version, dated 4 December 2018.

On 30 September 2019, the Hansa TSOs did submit for the Hansa NRAs an amendment proposal, dated 14 August 2019, for the RCCS Methodology. The primary purpose for the TSOs’ amendment proposal was to include the interconnector, “the Cobra Cable” on the bidding zone border DK1-NL, within the scope of the RCCS Methodology.

The concerned Danish and German Ministries did on 30 June 2020 submit an application for the European Commission (“EC”) on a derogation for Kriegers Flak Common Grid Solution (“KF CGS”), being a hybrid interconnector and offshore wind farms grid connection on the Hansa bidding zone border DK2-DE/LU, in respect of available cross-zonal transmission capacity for the benefit of priority access for wind power generated electricity.

On 6 March 2020, ACM on behalf of the Hansa NRAs requested ACER for a 6-month extension pursuant to Article 6(10) of the Regulation (EU) 2019/942. In the request for extension, the Hansa NRAs stated that within 6 months following the extension, if granted by ACER, the Hansa NRAs would strive to reach a unanimous agreement to approve the amendment proposal for the Hansa RCCS Methodology or to request for amendments of the proposal for the RCCS Methodology.

By ACER decision 15-2020 of 14 July 2020, ACER granted the requested 6-month extension, thereby postponing the deadline for the Hansa NRAs' decision-making on the RCCS Methodology to 30 September 2020.

Article 9(12) of CACM GL provides for NRAs to request of amendments of a proposal for terms, conditions, and methodologies.

Article 9(13) of CACM GL provides for TSOs, NEMOs, and or NRAs, to request for amendments of terms, conditions, and methodologies having been previously adopted.

On 30 September 2020, the Hansa NRAs reached an agreement to request for amendments of the Hansa NRAs' amendment proposal for the RCCS Methodology pursuant to Article 9(12) of CACM GL.

This agreement of the Hansa NRAs shall provide evidence that a decision on the present Hansa RCCS Methodology does not need to be adopted by ACER pursuant to Article 9(11) of CACM GL. Therefore, this agreement is intended to constitute the basis on which the Hansa NRAs will each subsequently request the Hansa TSOs for amendments of the present Hansa RCCS Methodology.

The legal provisions that lie at the basis of the present Hansa RCCS Methodology, and this agreement by the Hansa NRAs on a request for amendment, can notably be found in Articles 3, 9, and 74, of CACM GL. Relevant extracts of those provisions are quoted here for reference:

Article 3 of CACM GL

*This Regulation aims at:*

- (a) *Promoting effective competition in the generation, trading and supply of electricity;*
- (b) *Ensuring optimal use of the transmission infrastructure;*
- (c) *Ensuring operational security;*
- (d) *Optimising the calculation and allocation of cross-zonal capacity;*
- (e) *Ensuring fair and non-discriminatory treatment of TSOs, NEMOs, the Agency, regulatory authorities and market participants;*
- (f) *Ensuring and enhancing the transparency and reliability of information;*
- (g) *Contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union;*
- (h) *Respecting the need for a fair and orderly market and fair and orderly price formation;*
- (i) *Creating a level playing field for NEMOs;*
- (j) *Providing non-discriminatory access to cross-zonal capacity*

Article 9 of CACM GL

1. *TSOs and NEMOs shall develop the terms and conditions or methodologies required by this Regulation and submit them for approval to the competent regulatory authorities within the respective deadlines set out in this Regulation. Where a proposal for terms and conditions or methodologies pursuant to this Regulation needs to be developed and agreed by more than one TSO or NEMO, the participating TSOs and NEMOs shall closely cooperate. TSOs, with the assistance of ENTSO for Electricity, and all NEMOs shall regularly inform the competent*

*regulatory authorities and the Agency about the progress of developing these terms and conditions or methodologies.*

[...]

5. *Each regulatory authority shall approve the terms and conditions or methodologies used to calculate or set out the single day-ahead and intraday coupling developed by TSOs and NEMOs. They shall be responsible for approving the terms and conditions or methodologies referred to in paragraphs 6, 7 and 8.*

[...]

7. *The proposals for the following terms and conditions or methodologies shall be subject to approval by all regulatory authorities of the concerned region:*

[...]

*(h) the redispatching or countertrading cost sharing methodology in accordance with Article 74(1);*

[...]

9. *The proposal for terms and conditions or methodologies shall include a proposed timescale for their implementation and a description of their expected impact on the objectives of this Regulation. Proposals on terms and conditions or methodologies subject to the approval by several or all regulatory authorities shall be submitted to the Agency at the same time that they are submitted to regulatory authorities. Upon request by the competent regulatory authorities, the Agency shall issue an opinion within three months on the proposals for terms and conditions or methodologies.*

10. *Where the approval of the terms and conditions or methodologies requires a decision by more than one regulatory authority, the competent regulatory authorities shall consult and closely cooperate and coordinate with each other in order reach an agreement. Where applicable, the competent regulatory authorities shall take into account the opinion of the Agency. Regulatory authorities shall take decisions concerning the submitted terms and conditions or methodologies in accordance with paragraphs 6, 7 and 8, within six months following the receipt of the terms and conditions or methodologies by the regulatory authority or, where applicable, by the last regulatory authority concerned.*

[...]

12. *In the event that one or several regulatory authorities request an amendment to approve the terms and conditions or methodologies submitted in accordance with paragraphs 6, 7 and 8, the relevant TSOs or NEMOs shall submit a proposal for amended terms and conditions or methodologies for approval within two months following the requirement from the regulatory authorities. The competent regulatory authorities shall decide on the amended terms and conditions or methodologies within two months following their submission. Where the competent regulatory authorities have not been able to reach an agreement on terms and conditions or methodologies pursuant to paragraphs (6) and (7) within the two-month deadline, or upon their joint request, the Agency shall adopt a decision concerning the amended terms and conditions or methodologies within six months, in accordance with Article 8(1) of Regulation (EC) No 719/2009. If the relevant TSOs or NEMOs fail to submit a proposal for amended terms and conditions or methodologies, the procedure provided for in paragraph 4 of this Article shall apply.*

13. *TSOs or NEMOs responsible for developing a proposal for terms and conditions or methodologies or regulatory authorities responsible for their adoption in accordance with paragraphs 6, 7 and 8, may request amendments of these terms and conditions or*

*methodologies. The proposals for amendment to the terms and conditions or methodologies shall be submitted to consultation in accordance with the procedure set out in Article 12 and approved in accordance with the procedure set out in this Article.*

[...]

#### Article 74 of CACM GL

1. *No later than 16 months after the decision on the capacity calculation regions is taken, all TSOs in each capacity calculation region shall develop a proposal for a common methodology for redispatching and countertrading cost sharing.*
2. *The redispatching and countertrading cost sharing methodology shall include cost-sharing solutions for actions of cross-border relevance.*
3. *Redispatching and countertrading costs eligible for cost sharing between relevant TSOs shall be determined in a transparent and auditable manner.*
4. *The redispatching and countertrading cost sharing methodology shall at least:*
  - (a) *determine which costs incurred from using remedial actions, for which costs have been considered in the capacity calculation and where a common framework on the use of such actions has been established, are eligible for sharing between all the TSOs of a capacity calculation region in accordance with the capacity calculation methodology set out in Articles 20 and 21;*
  - (b) *define which costs incurred from using redispatching or countertrading to guarantee the firmness of cross-zonal capacity are eligible for sharing between all the TSOs of a capacity calculation region in accordance with the capacity calculation methodology set out in Articles 20 and 21;*
  - (c) *set rules for region-wide cost sharing as determined in accordance with points (a) and (b).*
5. *The methodology developed in accordance with paragraph 1 shall include:*
  - (a) *a mechanism to verify the actual need for redispatching or countertrading between the TSOs involved;*
  - (b) *an ex post mechanism to monitor the use of remedial actions with costs;*
  - (c) *a mechanism to assess the impact of the remedial actions, based on operational security and economic criteria;*
  - (d) *a process allowing improvement of the remedial actions;*
  - (e) *a process allowing monitoring of each capacity calculation region by the competent regulatory authorities.*
6. *The methodology developed in accordance with paragraph 1 shall also:*
  - (a) *provide incentives to manage congestion, including remedial actions and incentives to invest effectively;*
  - (b) *be consistent with the responsibilities and liabilities of the TSOs involved;*
  - (c) *ensure a fair distribution of costs and benefits between the TSOs involved;*
  - (d) *be consistent with other related mechanisms, including at least:*
    - (i) *the methodology for sharing congestion income set out in Article 73;*
    - (ii) *the inter-TSO compensation mechanism, as set out in Article 13 of Regulation (EC) No 714/2009 and Commission Regulation (EU) No 838/2010;*
  - (e) *facilitate the efficient long-term development and operation of the pan-European interconnected system and the efficient operation of the pan-European electricity market;*

- (f) facilitate adherence to the general principles of congestion management as set out in Article 16 of Regulation (EC) No 714/2009;*
  - (g) allow reasonable financial planning;*
  - (h) be compatible across the day-ahead and intraday market time-frames; and*
  - (i) comply with the principles of transparency and non-discrimination.*
7. *By 31 December 2018, all TSOs of each capacity calculation region shall further harmonise as far as possible between the regions the redispatching and countertrading cost sharing methodologies applied within their respective capacity calculation region.*

## **II. The Hansa TSOs' amendment proposal for the present Hansa RCCS Methodology**

Ref. to Recital (5) of the TSOs' proposal, the Hansa RCCS Methodology identifies the cost sharing principles between relevant TSOs for redispatching (RD) and countertrading (CT) actions of cross-border relevance, according to the requirements from Article 74(2) of CACM GL, and follows the principles of the CCR Hansa RD&CT Methodology pursuant to Article 35 of CACM GL.

Furthermore, the Hansa RCCS Methodology is based on a Coordinated Net Transmission Capacity ("CNTC") approach with a strong link to the adjacent CCRs, i.e. CCR Nordic and CCR Core.

Article 2(2)(a)(i) to (v), of the TSOs' amendment proposal for the RCCS Methodology defines that cost sharing may be performed in the respect of the following types of costs for RD&CT measures,

- i. Cost of increase or decrease of generation and/or load pattern;
- ii. Availability payments for additional upward and downward regulation;
- iii. Curtailment of renewables;
- iv. Activation and start-up costs;
- v. Activation of balancing energy bids according to Commission Regulation (EU) 2017/2195 Article 29 in connection with Title V Articles 44 to 57.

Article 3 of the TSOs' proposal contains, "Cost-sharing methodology for redispatching and countertrading measures".

Hereunder, Article 3(1)(c) implies the following,

If a congestion occurs on a CCR Hansa interconnector, to which a number of wind farms are directly connected, and that congestion is caused by an error on the wind forecast for one of those wind farms, then costs and incomes for RD&CT measures, which have been applied to maintain the capacity on the interconnector in question, shall be split between the owners of the interconnector according to the sharing key in Annex 1 of the RCCS Methodology.

Thus, it is obvious from the wording of Article 3(1)(c), notably, "interconnector to which a number of windfarms are directly connected", in conjunction with Annex 1, that Article 3(1)(c) provides for KF CGS to fall within the scope of the Hansa TSOs' amendment proposal for the present Hansa RCCS Methodology.

Subsequently, Article 3(2)(a) and (b), and the cost sharing keys for KF CGS in Annex 1, refers to Article 3(1)(a) to (b) and (c) of the Hansa TSOs' amendment proposal for the Hansa RCCS Methodology.

### **III. Agreed Hansa NRAs' position**

The Hansa NRAs are not in support of the Hansa TSOs' amendment proposal for the present RCCS Methodology for the reasons, which are elaborated in detail below, and request the Hansa TSOs to amend the proposal, and to incorporate the following assessments of the Hansa NRAs, pursuant to Article 9(12) of CACM GL.

### **IV. Request for amendment of the TSOs' proposal for the Hansa RCCS Methodology**

Amending references to Regulation (EU) no 714/2009 and Directive 2009/72/EC, into references to Regulation (EU) 2019/943 and Directive (EU) 2019/944 respectively

Hansa NRAs request Hansa TSOs to amend within the proposal for the Hansa RCCS Methodology,

- the references to Regulation (EU) no 714/2009 into references to Regulation (EU) 2019/943, in Recital (3), and in Article 2(1), and
- the reference to Directive 2009/72/EC into a reference to Directive (EU) 2019/944, in Article 2(1).

Reference to the relevant Article of CACM GL in the TSOs' note to the Hansa RCCS Methodology

The Hansa TSOs did shape an explanatory note on cost types to accompany the TSOs' previous amended proposal of 4 December 2018 for the Hansa RCCS Methodology.

The whole of the content of that note is dealing with the RCCS Methodology. However, the front page of the note refers to Article 35 of CACM GL. In conjunction with the Hansa NRAs' requesting the Hansa TSOs to shape a consolidated version of the note to accompany the actual amended proposal (see the following single request, below), the Hansa NRAs request the Hansa TSOs to correct the reference to Article 74 of CACM GL on the front page of the note.

Information on cost sharing of types of costs, not specifically following from Article 74 of CACM GL

The Hansa NRAs approved the present Hansa RCCS Methodology in follow-up of the Hansa TSOs' proposal in an amended version, dated 4 December 2018.

However, the NRAs were less satisfied that the TSOs in an accompanying note of 4 December 2018 to the cost sharing of RD&CT did not fully comply with the NRAs' request that the TSOs were to elaborate, how cost sharing would work in practice for the types of costs, defined in Article 2(2)(a)(i) to (v). Thus, the NRAs did question, if those types of costs did fall within the scope of Article 74(4) of CACM GL, which implies e.g. the determination of, "costs incurred from using remedial actions".

This led to Hansa NRAs adopting a specific agreement of 19 February 2019 on RD&CT cost sharing, stating that the all Hansa TSOs were to submit information regarding the sharing of cost types, referred to in Article 2(2)(a)(ii) to (v) of the RCCS Methodology, in the event a TSO intends to include

the new (for a given TSO) cost type, latest 2 months before it is planned to be part of cost sharing. Also, the information should be accompanied by explanations, how the cost sharing of the types of costs will be consistent with the approved methodology, and practical examples of cost sharing.

A primary purpose of this actual request by all Hansa NRAs for amendments of the Hansa RCCS Methodology is to include the Dutch TSO, TenneT TSO NL BV, and ACM, fully in the CCR Hansa framework. Thus, ACM should principally approve the Hansa TSOs' amendment proposal for the Hansa RCCS Methodology, as well as the Hansa NRA's agreement of 19 February 2019 on RD&CT cost sharing.

In the respect of a comprehensive approach, Hansa NRAs request Hansa TSOs to incorporate into the Hansa RCCS Methodology, the Hansa TSOs' agreement of 19 February 2019 in the respect of submitting information on cost sharing of types of costs, which not specifically follows from Article 74 of CACM GL.

Thus, the Hansa NRAs request the Hansa TSOs to insert as Article 2(4) in the RCCS Methodology, as follows:

"If a TSO will apply cost sharing for the first time of one or more of the types of costs, referred to in Article 2(2)(a)(ii) to (v), the TSO shall inform the all CCR Hansa regulatory authorities on the TSO's cost sharing of those types of costs, at the latest 2 months in advance. The TSO is to accompany this information by explanations, elaborating how the cost sharing of the types of costs will be consistent with the RCCS Methodology, and showing examples how the cost sharing of those types of costs will work in practice."

Thus, the suggested wording of Article 2(4) of the RCCS Methodology, solely refers to "a/the TSO", because Article 2(2)(d) of the RCCS Methodology defines, "TSO" as a/the CCR Hansa TSO(s)..."

Also, Hansa NRAs request Hansa TSOs to shape a consolidated version of the TSOs' original accompanying note of 4 December 2018 to the cost sharing of RD&CT, and to insert into that note, the following new paragraph 2.5, explaining the new Article 2(4) of the Hansa RCCS Methodology,

### **"2.5 Information on cost sharing of new cost types**

Article 2 (2)(a)(ii) to (v), of the CCR Hansa RCCS Methodology include types of cost, which are not specifically following from the CACM Regulation. In view of a regional coordinated regulatory monitoring that the RCCS Methodology will be compliant with the CACM Regulation, the all CCR Hansa regulating authorities request the following,

If a CCR Hansa TSO will apply cost sharing for the first time of one or more of the types of costs, referred to in Article 2(2)(a)(ii) to (v), the TSO shall inform the all CCR Hansa regulatory authorities on the TSO's cost sharing of those types of costs, at the latest 2 months in advance. Also, the TSO is to accompany this information by explanations, elaborating how the cost sharing of the types of costs will be consistent with the RCCS Methodology, and showing examples how the cost sharing of those types of costs will work in practice."

Article 3(1)(c), Article 3(2)(a) to (b), and Annex 1, in conjunction with the European Commission's pending decision on KF CGS

The current provisions in the Hansa TSOs' amendment proposal for the Hansa RCCS Methodology, which are covering or referring to KF CGS, do not find unanimous support among Hansa NRAs because of uncertainties concerning the legal basis for KF CGS.

The concerned Danish and German Ministries have on 30 June 2020 submitted an application for the European Commission ("EC") on a derogation for KF CGS in respect of available cross-zonal transmission capacity for the benefit of priority access for wind power generated electricity.

The EC's pending decision will provide for clarity, whether a derogation may be granted for KF CGS in respect of available cross-zonal transmission capacity for the benefit of priority access for wind power generated electricity, and thus constitute the necessary legal basis for KF CGS in terms of the Hansa TSOs' amendment proposal for the Hansa RCCS Methodology.

Thus, Hansa NRAs require the following amendments of the Hansa TSOs' amendment proposal for the Hansa RCCS Methodology, in respect of KF CGS:

**A)** In the case that the EC's decision, granting a derogation for KF CGS, is published officially prior to Hansa TSOs' submission of an amended proposal for the Hansa RCCS Methodology pursuant to Article 9(12) of CACM GL, the Hansa TSOs are requested,

- 1) to maintain, and if needed to adjust to EC's decision, within the amended proposal, the provisions, covering or referring to KF CGS etc.,
  - a) Article 3(1)(c),
  - b) Article 3(2)(a),
  - c) Article 3(2)(b), and
  - d) In Annex 1, the boxes on cost sharing keys for "Kriegers Flak".
- 2) within the amended proposal, to insert references to EC's decision as the legal basis for the CCR Hansa RCCS Methodology on KF CGS, in
  - a) Recital (3), and
  - b) Article 2(1).
- 3) to include explanations in the recitals in the Hansa TSOs' amended proposal for the Hansa RCCS Methodology, and in the Hansa TSOs' consolidated accompanying note to the cost sharing of RD&CT, on the implications of EC's decision for the chosen approach on KF CGS in the Hansa RCCS Methodology.

**B)** In the case that the EC's decision, granting a derogation for KF CGS, is not published officially prior to the Hansa TSOs' submission of an amended proposal for the Hansa RCCS Methodology pursuant to Article 9(12) of CACM GL, the Hansa TSOs are requested within the amended proposal,

- 1) to remove from the Hansa TSOs' amendment proposal of 14 August 2019 for the Hansa RCCS Methodology,

- a) Article 3(1)(c), and
  - b) in Annex 1, the boxes on cost sharing keys for "Kriegers Flak".
- 2) to make the consequent adjustments,
- a) in Article 3(2)(a), the wording within, "Articles 3(1)(a), 3(1)(b) and 3(1)(c), following the CRC Methodology Article 3(1)(d)", shall be, "Articles 3(1)(a), and 3(1)(b), following the CRC Methodology Article 3(1)(c)", and
  - b) in Article 3(2)(b), the wording within, "Articles 3(1)(a), 3(1)(b), 3(1)(c) and 3(2)(a), following the CRC Methodology Article 3(1)(e)", shall be, "Articles 3(1)(a), 3(1)(b), and 3(2)(a), following the CRC Methodology Article 3(1)(d)".
- 3) to add a provision that the Hansa TSOs (provided EC's decision grants a derogation for KF CGS and within two months after that decision is published officially) will submit a new amendment proposal for the Hansa RCCS Methodology pursuant to Article 9(13), 1st subparagraph, of CACM GL, and will,
- a) reinsert within that new amendment proposal, and if needed to adjust to EC's decision, the former emplacements and wordings of these provisions from the Hansa TSO' amendment proposal of 14 August 2019 for the Hansa RCCS Methodology,
    - i) Article 3(1)(c),
    - ii) Article 3(2)(a),
    - iii) Article 3(2)(b), and
    - iv) In Annex 1, the boxes on cost sharing keys for "Kriegers Flak".
  - b) insert within that new amendment proposal, references to EC's decision as the legal basis for the CCR Hansa RCCS Methodology, in the respect of KF CGS, in
    - i) Recital (3), and
    - ii) Article 2(1).
  - c) to include explanations, in the recitals in the new amendment proposal, and in the Hansa TSOs' consolidated accompanying note to the cost sharing of RD&CT, on the implications of EC's decision for the chosen approach on KF CGS in the RCCS Methodology.

**C)** In the case that the EC decides negatively on a derogation for KF CGS prior to the Hansa TSOs' submission of the amendment proposal for the Hansa RCCS Methodology pursuant to Article 9(12), the Hansa TSOs are requested within the amended proposal,

- 1) to remove from the Hansa TSOs' amendment proposal, dated 14 August 2019, for the Hansa RCCS Methodology,
  - a) Article 3(1)(c), and
  - b) in Annex 1, the boxes on cost sharing keys for "Kriegers Flak".
- 2) to make the consequent adjustments,

- a) in Article 3(2)(a), the wording within, “Articles 3(1)(a), 3(1)(b) and 3(1)(c), following the CRC Methodology Article 3(1)(d)”, shall be, “Articles 3(1)(a), and 3(1)(b), following the CRC Methodology Article 3(1)(c)”, and
- b) in Article 3(2)(b), the wording within, “Articles 3(1)(a), 3(1)(b), 3(1)(c) and 3(2)(a), following the CRC Methodology Article 3(1)(e)”, shall be, “Articles 3(1)(a), 3(1)(b), and 3(2)(a), following the CRC Methodology Article 3(1)(d)”.

## **V. Conclusion**

The Hansa NRAs have assessed, consulted, and have closely cooperated and coordinated with one another, to reach an agreement that the Hansa NRAs cannot approve the Hansa TSOs’ proposal of 14 August 2019 for the Hansa RCCS Methodology pursuant to Article 74(1) of the CACM GL.

Pursuant to Article 9(12) of CACM GL, the Hansa NRAs hereby request for amendments of both

- the Hansa TSOs’ proposal of 14 August 2019 for the Hansa RCCS Methodology, and
- the Hansa TSOs’ original accompanying note of 4 December 2018 to the cost sharing of RD&CT,

In follow-up of this request for amendment, the Hansa TSOs shall for the amendments of the Hansa RCCS Methodology and a consolidated accompanying note take into account the Hansa NRAs’ assessments on the substance of the requested amendments, being stated above.

In respect of format, the Hansa NRAs request the Hansa TSOs to submit an amended proposal for the Hansa RCCS Methodology and a consolidated accompanying note in two versions,

- versions, showing track-changes in respect of the actual requests for amendments, and
- “clean” versions, not showing track-changes in respect of the actual requests for amendments.

Also, the Hansa NRAs request the Hansa TSOs to involve the certified TSO, Baltic Cable in the present amendment process, in terms of informing Baltic Caple on a draft amended proposal, and on a draft consolidated accompanying note, prior to the Hansa TSOs’ submission of the finalized amended proposal, and of the finalized consolidated accompanying note, for the Hansa NRAs.

The Hansa TSOs are to submit an amended proposal for the Hansa RCCS Methodology and a consolidated accompanying note for the Hansa NRAs no later than 2 months after receiving the last Hansa NRA’s request for amendment.

Upon the receipt of the Hansa TSOs’ amendment proposal for the Hansa RCCS Methodology and a consolidated accompanying note, the Hansa NRAs are to decide, on a possible approval of the proposal and the accompanying note, within two months pursuant to Article 9(12), 2nd subparagraph, of CACM GL.

The Hansa NRAs have agreed to inform their respective TSOs on the request for amendments of both the Hansa TSOs’ amendment proposal of 14 August 2019 for the Hansa RCCS Methodology,

and the Hansa TSOs' original accompanying note of 4 December 2018 to the cost sharing of RD&CT, on the basis of this agreement by 30 September 2020.