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## Public consultation answer to Amendment proposal for CCR Hansa ID/DA Capacity Calculation Methodology #307675

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Green Power Denmark would like to thank for the opportunity to provide input to the amendment proposal for CCR Hansa ID/DA Capacity Calculation Methodology. Green Power Denmark emphasizes that cross border capacity is essential for the well-functioning of the European market. The maximum cross border capacity should always be provided to the market.

### **Amending the CCR Hansa ID/DA CCM**

The consultation concerns the amendment of the CCR Hansa regional TSO proposal for the common coordinated capacity calculation methodology. The purpose of the amendment is to update the methodology to incorporate dependencies on developments such as Nordic flow-based and other European regulatory and system changes.

### **Allocation constraints**

Green Power Denmark notes that one of the changes to the methodology concerns three extra allocation constraints.

- d. Minimum flow on DC lines;
- e. Limitations of amount of polarity reversals (zero-crossings) on DC lines for a given period of time;
- f. Limitation of maximum flow on DC lines dependent on cable temperature and cable pressure.

The application of allocation constraints limits the exchange of electricity between bidding zones and therefore only constraints that are essential for the safe operation of the cable shall be applied.

Green Power Denmark finds that the description of the allocation constraint “minimum flow on DC lines” is very limited in the explanatory document. Why is this constraint now necessary to operate the cable inside its technical capabilities – when it has not previously been necessary?

Green power Denmark notes that the limit on the number of polarity reversals is not explicitly mentioned in the methodology and in the explanatory note it is mentioned that one of the cable suppliers of cables recommends keeping the number of polarity reversals below 1000 per year. With 15 min MTU the potential

number of reversals on the line is  $4 \times 24 \times 365 = 35.040$  possible reversals a year. Green Power Denmark therefore encourages that the limit on the number of polarity reversals is calculated to optimize economic welfare and not only to avoid decreasing the life expectancy of the cable.

In accordance with Article 23(1) of the CACM Regulation, CCR Hansa TSOs shall respect the operational security limits used in operational security analysis carried out in line with Article 72 of the SO Regulation. One of these are steady-state thermal limits which are considered in the NTC calculation process, and therefore Green Power Denmark sees no point of adding a new allocation constraint (f) which introduces a limitation of maximum flow on DC lines dependent on cable temperature and cable pressure. Why is this constraint introduced when it is already represented in the calculation of NTC? Also, if the constraint is necessary, it should be possible not only to decrease the capacity due to cable temperature and pressure, but also possible to increase the capacity when the temperature and pressure makes this possible.

Further to this Green Power Denmark would like to encourage that the report, mentioned in article 16(10) in the CCR Hansa ID/DA CCM and in accordance with CACM article 26(5) on the reductions made during the validation of cross-zonal capacity, is published to the market participants by the regulatory authorities of the capacity calculation region.

#### **The 70% rule DA & ID**

Green Power Denmark would like the TSOs of CCR Hansa to elaborate how CCR Hansa CCM and the implementation of AHC ensures the fulfillment of the 70% rule in accordance with article 16(8a) of the regulation (EU) 2019/943 of 5 June 2019 on the internal market for electricity.

In the explanatory document it is stated that *"As only CCR Hansa interconnectors are included as CNEs in CCR Hansa capacity calculation, following Article 5, a situation where an internal AC grid element requires a correction of available cross-zonal capacity is not applicable for CCR Hansa (article 16(2)), but it is also stated that "AHC enables the capacity allocation algorithm to make an economic optimization between allocation on the external borders to the flow-based domain and the borders within the flow-based domain" article 2(b).*

Med venlig hilsen

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