

All-island Interconnector Responsibilities under CACM Regulation Decision

Section	Description	Draft Adopted Text	EirGrid	SONI	EirGrid Interconnector Limited	NEMO Interconnector Limited	Decision	RA Comments
General Provisions	Recitals	n/a					No obligations for TSOs	Non legally binding interpretative text. Relevant to all, but doesn't contain legal obligations.
General Provisions	Subject Matter and Scope	1					No obligations for TSOs	This Article does not address TSOs.
General Provisions	Definitions	2	✓	✓	✓	✓	All TSO Obligations	Definitions need to apply to anyone undertaking a role within the Regulations and thus apply to all parties.
General Provisions	Objectives of Capacity Calculation and Congestion Management Co-operation	3	✓	✓	✓	✓	All TSO Obligations	Sets out broad framework for all actions undertaken in complying with Regulation.
General Provisions	NEMOs designation and revocation of the designation	4					No obligations for TSOs	This Article does not address TSOs.
General Provisions	NEMOs designation in case of a national legal monopoly for trading services	5					No obligations for TSOs	This Article does not address TSOs.
General Provisions	NEMO Designation Criteria	6					No obligations for TSOs	This Article does not address TSOs.
General Provisions	NEMO Tasks	7					No obligations for TSOs	This Article does not address TSOs.
General Provisions	TSOs' tasks related to Single Day Ahead and Intraday Coupling	8	✓	✓	✓	✓	All TSO Obligations	8(2) refers to any party certified as a TSO. Accordingly it applies to all TSOs who are Certified or who will be Certified as TSOs.
General Provisions	Adoption of Terms Conditions and Methodologies	9	✓	✓	✓	✓	All TSO Obligations	
General Provisions	Day-to-Day Management of Single Day Ahead and Intraday Coupling	10	✓	✓	✓	✓	All TSO Obligations	This Article applies to both the SO in its capacity as the real time system operator and the IC in their capacity as managers of cross border electricity flows.
General Provisions	Stakeholder Involvement	11					No obligations for TSOs	This Article does not place a direct obligation on TSOs but rather places obligations on ACER and ENTSO-E. The TSOs are represented by ENTSO-E and will correspond in
General Provisions	Consultation	12	✓	✓	✓	✓	All TSO Obligations	This Article specifies the consultation procedures that TSOs and NEMOs must follow and therefore it applies broadly to any party taking part in the development of any methodology.
General Provisions	Confidentiality Obligations	13	✓	✓	✓	✓	All TSO Obligations	This Article is crucial to ensure that all parties have due regard to confidentiality.
Capacity Calculation	Capacity Calculation Timeframes	14	✓	✓	✓	✓	All TSO Obligations	We consider that Art 14(1)(2) applies to both the SO in its capacity as the real time system operator and the ICs in their capacity as managers of cross border electricity trades.
Capacity Calculation	Capacity Calculation Regions	15	✓	✓	✓	✓	All TSO Obligations	We consider that this article applies to both the SO in its capacity as the real time system operator and the ICs in their capacity as managers of cross border electricity trades.
Capacity Calculation	Generation and Load Data Provision Methodology	16	✓	✓			SO Obligations only	As generators provide load data to SOs, this Article does not apply to ICs.
Capacity Calculation	Common Grid Model Methodology	17	✓	✓	✓	✓	All TSO Obligations	The Common Grid Model will include the relevant parts of European Grids with forecasted production and consumption patterns for each market timeunit. It applies to all TSOs.
Capacity Calculation	Scenarios	18	✓	✓	✓	✓	All TSO Obligations	Applies to ICs in their capacity as managers of cross border electricity flows as well as to TSOs in its capacity as real time system operator.
Capacity Calculation	Individual Grid Model	19	✓	✓	✓	✓	All TSO Obligations	Applies to all TSOs.
Capacity Calculation	Introduction of flow based capacity calculation methodology	20	✓	✓	✓	✓	All TSO Obligations	Applies to SOs in capacity as real time system operator and ICs in their capacity as managers of cross border electricity flows.
Capacity Calculation	Capacity Calculation Methodology	21	✓	✓	✓	✓	All TSO Obligations	Applies to SOs in capacity as real time system operator and ICs in their capacity as managers of cross border electricity flows.
Capacity Calculation	Reliability Margin Methodology	22	✓	✓	✓	✓	All TSO Obligations	Applies to SOs in capacity as real time system operator and ICs in their capacity as managers of cross border electricity flows.
Capacity Calculation	Methodologies for Operational Security Limits, Contingencies and Allocation Constraints	23	✓	✓	✓	✓	All TSO Obligations	Applies to SOs in capacity as real time system operator and ICs in their capacity as managers of cross border electricity flows.
Capacity Calculation	Generation Shift Keys Methodologies	24	✓	✓			SO Obligations only	Considering possible synergies and potential of interests, it is envisaged that the ICs would have no role in this instance.
Capacity Calculation	Methodology for Remedial Security Action in Capacity Calculation	25	✓	✓	✓	✓	All TSO Obligations	Applies to SOs in capacity as real time system operator and ICs in their capacity as managers of cross border electricity flows.
Capacity Calculation	Cross Zonal Capacity Validation Methodology	26 (1)-(5)	✓	✓	✓	✓	All TSO Obligations	We consider that Article 26 applies to both the SO in its capacity as real time system operator, being responsible for network security and also to ICs in their capacity as managers of cross border electricity flows.
		26(6)					No obligations for TSOs	We do not consider that Article 26(6) addresses TSOs.
Capacity Calculation	General Provisions: Establishment of a European Merging Function and Establishment of a Coordinated Capacity Calculator	27	✓	✓	✓	✓	All TSO Obligations	Applies to SOs in capacity as real time system operator and ICs in their capacity as managers of cross border electricity flows.
Capacity Calculation	Creation of a Common Grid Model	28(1)-(2)					No obligations for TSOs	These sub-paragraphs do not address TSOs.
Capacity Calculation	Creation of a Common Grid Model	28(3)-(5)	✓	✓	✓	✓	All TSO Obligations	All TSOs will need to provide data in relation to developing and submitting the individual grid models they must create under Article 19.
Capacity Calculation	Regional Calculation of Cross Zonal Capacity	29(1)	✓	✓	✓	✓	All TSO Obligations	All TSOs need to provide data to facilitate regional calculation of cross zonal capacity for each capacity calculation timeframe.
		29(2)-(11)	✓	✓			SO Obligations only	Since the existing capacity calculation is an SO role, we consider it logical to assign this role to the SOs.
Capacity Calculation	Validation and Delivery of Cross Zonal Capacity	30 (1)-(2)	✓	✓	✓	✓	All TSO Obligations	RAs are of the view that this Article applies to SOs in capacity as real time system operator and ICs in their capacity as managers of cross border electricity flows.
		30(3)	✓	✓			SO Obligations only	Since the existing capacity calculation is an SO role, we consider it logical to assign this role to the SOs.
Capacity Calculation	Biennial Report on Capacity Calculation and Allocation	31 (1) -(3) (5)					No TSO Obligation	We consider that these provisions are ENTSO-E obligations and as such do not put direct obligations on TSOs.
Capacity Calculation	Biennial Report on Capacity Calculation and Allocation	31(4)	✓	✓	✓	✓	All TSO Obligations	Applies to SOs in capacity as real time system operator and ICs in their capacity as managers of cross border electricity flows.
Capacity Calculation	Reviewing Existing Bidding Zone Configuration	32	✓	✓	✓	✓	All TSO Obligations	A discretionary Article giving the TSOs the option to participate in certain activities.
Capacity Calculation	Criteria for Reviewing Bidding Zone Configurations	33	✓	✓	✓	✓	All TSO Obligations	A discretionary Article giving the TSOs the option to participate in certain activities.
Capacity Calculation	Regular Reporting on current Bidding Zone Configuration by ENTSO-E and ACER	34	✓	✓	✓	✓	All TSO Obligations	TSOs will have the responsibility to carry out review if requested by the agency and have a responsibility in this regard.
Capacity Calculation	Coordinated Redispatching and Countertrading	35	✓	✓			No IC Obligations	We consider that it is the responsibility of the SO to balance the network and therefore it is not appropriate for other TSOs to be involved in redispatching and countertrading.
Capacity Calculation	General Provisions - All NEMO back up procedures	36(1) (2) and (4)					No TSO Obligation	These sub-paragraphs require NEMOs to develop, maintain and operate the algorithms for ID and DA. These sub-paragraphs are not addressed to TSOs.
Capacity Calculation	General Provisions - All NEMO back up procedures	36(3)	✓	✓	✓	✓	All TSO Obligations	Applies to SOs in capacity as real time system operator and ICs in their capacity as managers of cross border electricity flows.
Day Ahead and Intraday	Price Coupling Algorithm Development and Continuous Trading Matching Algorithm Development	37(1)(a), (3), (4) (6)	✓	✓	✓	✓	All TSO Obligations	Applies to SOs in capacity as real time system operator and ICs in their capacity as managers of cross border electricity flows.
Day Ahead and Intraday	Price Coupling Algorithm Development and Continuous Trading Matching Algorithm Development	37(1b) (2)(5)					No TSO Obligation	These sub-paragraphs relate to NEMOs and we therefore consider that they do not address TSOs.
Day Ahead	Objectives of the Price Coupling Algorithm	38					No obligations for TSOs	This Article relates to the objectives which the DA algorithm results must fulfill.
Day Ahead	Inputs and Results of the Price Coupling Algorithm	39(1) -(3)					No obligations for TSOs	Sub-paragraphs (1) -(3) sets out the inputs and results of the DA algorithm. We consider that it does not address TSOs.
Day Ahead	Inputs and Results of the Price Coupling Algorithm	39 (4)	✓	✓	✓	✓	All TSO Obligations	RAs are of the view that this Article applies to SOs in capacity as real time system operator and ICs in their capacity as managers of cross border electricity flows.
Day Ahead	Products Accommodated	40					No TSO Obligation	This Article does not address TSOs as it is pertains to NEMO functions.
Day Ahead	Maximum and Minimum Prices	41(1)	✓	✓	✓	✓	All TSO Obligations	Applies to System Operator in its capacity as real time system operator dealing with the value of lost load and the ICs in their capacity as managers of cross border flows.
		41(2)					No TSO Obligation	This sub-paragraph requires the NEMOs to submit the proposal to the regulatory authorities for approval and to inform the TSOs of the decision. This sub-paragraph does not address TSOs.

Day Ahead	Pricing of Day Ahead Cross Zonal Capacity	42	✓	✓	✓	✓	All TSO Obligations	Applies to all TSOs.
Day Ahead	Methodology for Calculating Scheduled Exchanges Resulting from Single Day Ahead Coupling	43	✓	✓	✓	✓	All TSO Obligations	Applies to SOs in capacity as real time system operator and IC s in their capacity as managers of cross border electricity flows.
Day Ahead	Establishment of Fallback Procedures	44	✓	✓	✓	✓	All TSO Obligations	Applies to SOs in capacity as real time system operator and IC s in their capacity as managers of cross border electricity flows.
Day Ahead	Arrangements Concerning more than one NEMO in one Bidding Zone and for Interconnectors which are not Certified	45	✓	✓	✓	✓	All TSO Obligations	Applies to all TSOs.. Although this Article requires TSOs to develop a proposal for cross-zonal capacity allocation and other arrangements, obligations are also placed on TSOs including existing interconnectors.
Day Ahead	Provision of Input Data	46	✓	✓			SO Obligations only	The entity which will perform the role of the coordinated capacity calculator has yet to be determined, however existing capacity calculation in an SO role.
Day Ahead	Operation of the Single Day Ahead Coupling	47					No obligations for TSOs	This Article does not address TSOs in SEM.
Day Ahead	Delivery of Results	48 (1) (3) (4)					No TSO Obligation	These subparagraphs do not address TSOs.
Day Ahead	Delivery of Results	48(2)	✓	✓	✓	✓	All TSO Obligations	We consider that this Sub Article applies to both the SO inits capacity as the real time system operator and the ICs in their capacity as managers of cross border electricity flows.
Day Ahead	Calculation of Scheduled Exchanges resulting from the Single Day Ahead Coupling	49	✓	✓	✓	✓	All TSO Obligations	We consider that this Sub Article applies to both the SO inits capacity as the real time system operator and the ICs in their capacity as managers of cross border electricity flows.
Day Ahead	Initiation of Fallback Procedures	50					No TSO Obligation	This Article does not address TSOs.
Intraday	Objectives of the Continuous Trading Matching Algorithm	51					No TSO Obligation	This Article does not address TSOs.
Intraday	Results of the Continuous Trading Matching Algorithm	52(1) and (2)					No TSO Obligation	These sub-paragraphs do not address TSOs.
Intraday	Results of the Continuous Trading Matching Algorithm	52(3)	✓	✓	✓	✓	All TSO Obligations	We consider that this Sub Article applies to both the SO inits capacity as the real time system operator and the ICs in their capacity as managers of cross border electricity flows.
Intraday	Products Accommodated	53					No TSO Obligation	This Article does not address TSOs.
Intraday	Maximum and Minimum Prices	54(1)	✓	✓	✓	✓	All TSO Obligations	We consider that this Sub Article applies to both the SO inits capacity as the real time system operator and the ICs in their capacity as managers of cross border electricity flows.
Intraday	Maximum and Minimum Prices	54(2)-(3)					No TSO Obligation	These sub-paragraphs do not address TSOs.
Intraday	Pricing of Intraday Capacity	55			✓	✓	IC obligations only	We consider this Article to be applicable to ICs as managers of cross border electricity flows.
Intraday	Methodology for Calculating Scheduled Exchanges Resulting from Single Intraday Coupling	56	✓	✓	✓	✓	All TSO Obligations	We consider that this Article applies to both the SO inits capacity as the real time system operator and the ICs in their capacity as managers of cross border electricity flows.
Intraday	Arrangements Concerning more than one NEMO in one Bidding Zone and for Interconnectors which are not Certified	57	✓	✓	✓	✓	All TSO Obligations	We consider that this Article creates obligations for all TSOs.
Intraday	Provision of Input Data	58 (2)	✓	✓	✓	✓	All TSO Obligations	We consider that this Article creates obligations for all TSOs.
		58(1),(3)	✓	✓			SO Obligations only	Since the existing capacity calculation is an SO role, we consider it logical to assign this role to the Sos.
Intraday	Operation of the Single Intraday Coupling	59	✓	✓	✓	✓	All TSO Obligations	We consider that this Article creates obligations for all TSOs.
Intraday	Delivery of Results	60					No TSO Obligation	This Article does not address TSOs.
Intraday	Calculation of Scheduled Exchanges resulting from the Single Intraday Coupling	61	✓	✓	✓	✓	All TSO Obligations	We consider that this Article applies to both the SO inits capacity as the real time system operator and the ICs in their capacity as managers of cross border electricity flows.
Intraday	Publication of Market Information	62					No TSO Obligation	This Article does not address TSOs
Intraday	Complementary Regional Auctions	63	✓	✓	✓	✓	All TSO Obligations	We consider that this Article applies to both the SO inits capacity as the real time system operator and the ICs in their capacity as managers of cross border electricity flows.
Transitional Arrangements	Provisions relating to Explicit Allocation	64			✓	✓	IC obligations only	A discretionary Article giving the TSOs the option to participate in certain activities.
		65 (1)			✓	✓	IC obligations only	Article 65(1) is a discretionary provision which gives the TSOs the option to participate in certain activities.
Transitional Arrangements	Removal of Explicit Allocation	65(2),(3)					No TSO Obligation	This Article does not address TSOs
		66 (1)(2)					No TSO Obligation	This Article does not address TSOs
Transitional Arrangements	Provisions relating to Intraday Arrangements	66 (3)			✓	✓	IC obligations only	Article applies to ICs as managers of cross border electricity flows.
		67			✓	✓	IC obligations only	Article applies to ICs as managers of cross border electricity flows.
Clearing and Settlement for Day Ahead and Intraday Coupling	Clearing and Settlement	68 (1)-(5),(9)					No TSO Obligation	This Article does not address TSOs
		68(6)-(8)	✓	✓	✓	✓	All TSO Obligations	Although Article 68 (1)-(5) does not address TSOs; the remainder of this Article namely 68(6)-(8) applies to both the SO in its capacity as the real time system operator and the ICs in their capacity managers of cross border electricity flows.
Firmness of Allocated Cross Zonal Capacity	Proposal for Day Ahead Firmness Deadline	69	✓	✓	✓	✓	All TSO Obligations	We consider that this Article applies to both the SO inits capacity as the real time system operator and the IC s in their capacity as managers of cross border electricity flows.
Firmness of Allocated Cross Zonal Capacity	Firmness of Day Ahead Capacity and Allocation Constraints	70	✓	✓	✓	✓	All TSO Obligations	We consider this Article to be applicable to both the SO in its capacity as the real time system operator and the ICs in their capacity as managers of cross border electricity flows.
Firmness of Allocated Cross Zonal Capacity	Firmness of Intraday Capacity	71	✓	✓	✓	✓	All TSO Obligations	We consider this Article to be applicable to both the SO in its capacity as the real time system operator and the ICs in their capacity as managers of cross border electricity flows.
Firmness of Allocated Cross Zonal Capacity	Firmness in the Event of Force Majeure or Emergency Situations	72	✓	✓	✓	✓	All TSO Obligations	In the event of Force Majeure or Emergency situations, the SO is entitled to curtail cross zonal capacities which have already been allocated in order to maintain system security, therefore this Article applies to both the SO and ICs.
Costs	Congestion Income Distribution Methodology	73			✓	✓	IC obligations only	We consider this Article to be applicable to ICs as managers of cross border electricity flows.
Costs	Redispatching and Countertrading Cost Sharing Methodology	74	✓	✓			SO Obligations only	As it is the responsibility of the SO to balance the network we consider it more appropriate for ICs to beinvolved in redispatching and countertrading.
Costs	General Provisions on Cost Recovery	75(1)-(2)					No TSO Obligation	These paragraphs relate to tasks for the regulatory authorities
		75(3)	✓	✓	✓	✓	All TSO Obligations	This task is relevant to all TSOs as it relates to general provisons on cost recovery for CACM.
Costs	Costs of Establishing, Amending and Operating Single Day Ahead and Intraday Coupling	76 (1),(3)					No TSO Obligation	These paragraphs list the costs that the NEMOS shall bear as well as how they can recover these costs, and do not address TSOs.
		76 (2)	✓	✓	✓	✓	All TSO Obligations	Applies to all TSOs as it allows [all] TSOs to make a contribution to NEMO costs. This is a discretionary provison which may apply to all TSOs.
Costs	Clearing and Settlement Costs	77	✓	✓	✓	✓	All TSO Obligations	We consider that this Article applies to both the SO inits capacity as the real time system operator and the IC s in their capacity as managers of cross border electricity flows.
Costs	Costs of Establishing and Operating Coordinated Capacity Calculation Processes	78	✓	✓	✓	✓	All TSO Obligations	Applies to TSOs as all TSOs will fulfill obligations withint his process at least through data provison .
Costs	Costs of Ensuring Firmness	79	✓	✓	✓	✓	All TSO Obligations	We consider this Article to be applicable to both the SO in its capacity as the real time system operator and the ICs intheir capacity as managers of cross border electricity flows.
Costs	Cost Sharing between NEMOs and TSOs in different Member States	80	✓	✓	✓	✓	All TSO Obligations	This Article applies to all TSOs as the Article provides that all TSO costs incurred for establishing, amendingand operating DA and ID be explained in full.
Delegation of Tasks and Monitoring	Delegation of Tasks	81	✓	✓	✓	✓	All TSO Obligations	This is a discretionary provison which gives the TSOs an option to participate in certain activities.
Delegation of Tasks and Monitoring	Monitoring of the Implementation of Single Day Ahead and Intraday Coupling	82(1)-(4)					No TSO Obligation	We are currently of the view that these Sub-paragraphs do not place direct obligations on the TSOs.
Delegation of Tasks and Monitoring	Monitoring of the Implementation of Single Day Ahead and Intraday Coupling	82(5)-(6)	✓	✓	✓	✓	All TSO Obligations	All TSOs may need to provide data to ENTSO-E and ACER as TSOs have different levels of obligations under CACM.
Transitional Arrangements and Final Provisions	Transitional Provisions for Ireland and Northern Ireland	83	✓	✓	✓	✓	All TSO Obligations	This provision applies to all TSOs in Ireland and Northern Ireland.
Transitional Arrangements and Final Provisions	Entry into Force	84					No TSO Obligation	This Article does not address TSOs.

Draft Adopted	Final Comitology	Old Article
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74	73	96
75	74	97
76	75	GC1
77	76	GC2
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Old Article (combined)
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