

**Position Paper of the French and German regulatory  
authorities**

**on**

**the Amendment of the French-German interconnection  
explicit capacity allocation rules for the intraday  
timeframe, in accordance with Article 64(2) of  
Commission Regulation (EU) 2015/1222 of 24 July 2015  
establishing a Guideline on Capacity Allocation and  
Congestion Management**

**23 January 2025**

## I. Introduction and legal framework

This document elaborates an agreement between the German regulatory authority Bundesnetzagentur (BNetzA) and the French regulatory authority Commission de régulation de l'énergie (CRE), reached on 23 January 2025, on the amendment of the French-German interconnection explicit capacity allocation rules for the intraday timeframe, as proposed by the concerned TSOs Amprion GmbH (Amprion), Réseau de Transport d'Electricité, S.A. (RTE) and TransnetBW GmbH (TransnetBW) on 21 and 22 January 2025 **in accordance with Articles 9(13) and 64(2) of Commission Regulation (EU) 2015/1222** of 24 July 2015 establishing a guideline on capacity allocation and congestion management as amended by Commission Implementing Regulation (EU) 2021/280 of 22 February 2021 (hereafter: "CACM Regulation").

This agreement in the sense of Article 9(10) CACM Regulation between BNetzA and CRE is intended to constitute the basis on which the concerned regulatory authorities will each subsequently adopt an approval of the amended French-German interconnection explicit capacity allocation rules for the intraday timeframe in accordance with Article 64(2), pursuant to Article 9(7)(g), (10) and (13) of CACM Regulation.

## II. The French-German interconnection explicit capacity allocation rules for the intraday timeframe

The CACM Regulation pursues implicit capacity allocation methods at interconnections in the day-ahead and intraday market timeframes (see Recital 13). These methods consist in allocating capacity and electricity simultaneously for cross-border electricity trading. The single intraday platform provides the pan-European intraday coupling.

At the border between France and Germany, an explicit allocation in the intraday timeframe, in parallel with the implicit allocation, was implemented on 14 December 2010 for hourly products. In November 2015, CRE and BNetzA approved the version 2.4 of intraday capacity allocation rules between France and Germany ("IFD rules"), which enable explicit half-hour capacity allocation with 24 intraday gates since 15 December 2015.

Pursuant to Article 64(1) of CACM Regulation, where jointly requested by the regulatory authorities of the Member States of each of the bidding zone borders concerned, the TSOs concerned shall provide, in the intraday market timeframe, explicit allocation in addition to implicit allocation, via the capacity management module on bidding zone borders. In September 2016, CRE and BNetzA jointly requested Amprion, RTE and TransnetBW to continue to provide explicit intraday capacity allocation on the interconnectors connecting the French and the German bidding zones, for all intraday products available. In May/June 2018, BNetzA and CRE approved the version 3.0 of the IFD rules.

In accordance with Article 64(2) CACM Regulation, the TSOs on the bidding zone borders concerned shall jointly develop a proposal on the conditions that shall be fulfilled by market participants to participate in explicit allocation. The proposal shall be subject to the joint approval by the regulatory authorities of the Member States of each of the bidding zone borders concerned following the procedure of Article 9(7) and (10) CACM Regulation. The same applies with regard to amendments of once approved explicit capacity allocation rules, Article 9(13) CACM Regulation.

Amprion, RTE and TransnetBW are planning to introduce 15-minute market time units (MTU) for the French-German interconnection, thereby enabling quarter-hour capacity allocation for the intraday timeframe from 22 January 2025 onwards. For that reason, they propose the amendment of the explicit capacity allocation rules in order to align the provisions with the new market time units. To that end, the concerned TSOs submitted a proposal concerning the French-German interconnection explicit capacity allocation rules for the intraday timeframe on 21 and 22 January 2025 to BNetzA and CRE.

Amprion, RTE and TransnetBW consulted stakeholders on the draft amendment proposal between 18 December 2024 and 18 January 2025. Two stakeholders made suggestions for improvement of the draft allocation rules. The suggestion to account for the multiple calculations occurring throughout the intraday timeframe, was considered by the three TSOs, in addition to suggestions for linguistic corrections. In this regard, the proposal for Article 18(2) of the allocation rules has been amended so that it now determines that the published available intraday capacity is subsequently updated during the intraday timeframe after its first publication.

The CACM Regulation requires regulatory authorities to consult and closely cooperate and coordinate with each other in order to reach an agreement and issue their respective national decisions based on that agreement within six months following the receipt of the submitted methodology proposal by the last regulatory authority concerned. BNetzA and CRE shall therefore issue their respective national decisions until 22 July 2025 at the latest.

### **III. All Regulatory Authorities' position**

The amendment proposal of the three TSOs aligns the explicit capacity allocation rules applicable to the French-German interconnection with the introduction of 15-minute market time units (MTU) for the intraday timeframe. While Amprion and TransnetBW already provide capacity allocation for 15-Minute Market Time Units (MTU), RTE is planning to introduce such by 22 January 2025, in order to also comply with Article 8(2) and (4) of Regulation (EU) 2019/943 on the internal market for electricity. BNetzA and CRE acknowledge that the proposed alignments are necessary in order to provide consistency with said time intervals.

### **IV. Actions / conclusion**

CRE and BNetzA have assessed, consulted and closely cooperated and coordinated to reach the agreement that the French-German interconnection explicit capacity allocation rules for the intraday timeframe meets the requirements of the CACM Regulation hence can be approved by both BNetzA and CRE.

The concerned regulatory authorities must therefore take their respective national decisions, on the basis of this agreement, by 22 July 2025 at the latest. The French-German interconnection explicit capacity allocation rules for the intraday timeframe will be adopted upon the decision of the last regulatory authority concerned.

Following the national decisions by the concerned regulatory authorities, the concerned TSOs will be required to publish the French-German interconnection explicit capacity allocation rules for the intraday timeframe as approved in line with Article 9(14) of the CACM Regulation.