

Amendment of Finnish, Estonian and  
Latvian TSOs of Baltic CCR TSOs' Common  
Methodology for Splitting Long-Term  
Cross-Zonal Capacity in Accordance with  
Article 16 of Commission Regulation (EU)  
2016/1719 of 26 September 2016  
Establishing a Guideline on Forward  
Capacity Allocation

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31 March 2026  
for NRAs approval

Finnish, Estonian and Latvian TSOs of Baltic CCR TSOs, taking into account the following:

### **Whereas**

(1) This document by Finnish, Estonian and Latvian Transmission System Operators of Baltic Capacity Calculation Region (hereafter referred to as “Baltic CCR”) as defined in accordance with Article 15 of Commission Regulation (EU) 2015/1222 establishing a guideline on Capacity Allocation and Congestion Management (hereafter referred to as the “CACM Regulation”) describes a common Amendment of the Methodology for Splitting Long-Term Cross-Zonal Capacity (hereafter referred to as the “LTCS”) in accordance with Article 16 of the Commission Regulation 2016/1719 (hereafter referred to as the “FCA Regulation”).

(2) This LTCS takes into account the general principles, goals and other methodologies set in the FCA Regulation, CACM Regulation, Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a Guideline on Electricity Transmission System Operation (hereafter referred to as "SO Regulation"), and Regulation 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity (hereafter referred to as “Regulation No 2019/943”).

(3) The goal of the FCA Regulation is the coordination and harmonisation of cross-zonal capacity calculation and capacity allocation in the forward markets, and it sets requirements for the TSOs to cooperate on the level of capacity calculation regions (hereinafter referred to as “CCRs”), on a pan-European level and across bidding zone borders. The FCA Regulation also sets rules for establishing capacity calculation methodologies based either on the coordinated net transmission capacity approach (hereafter referred to as “CNTC approach”) or on the flow-based approach (hereafter referred to as “FB approach”). In case of the TSO(s) allocating long term transmissions rights (hereinafter referred to as “LTTRs”), the FCA Regulation also sets rules for establishing a methodology for the splitting of long term capacity on different time frames, e.g. month and year.

(4) This LTCS fulfills the requirement of Article 16(2)(a) of the FCA Regulation as it ensures the availability of LTTRs for market participants at least for the yearly and monthly timeframes.

(5) This LTCS fulfills the requirement of Article 16(2)(b) by taking into account the Capacity Calculation Methodology developed in accordance with Article 10 of the FCA Regulation (hereinafter „Long-term CCM“), and approved pursuant to Article 4(7)(a) of FCA Regulation, thereby being coherent with the said methodology.

(6) This LTCS fulfills the requirement of Article 16(2)(c) as it ensures that yearly capacity shall not be allocated for the entire volume in the yearly auction in order to allow market participants to cover their hedging needs at least on yearly and monthly timeframes and thus allowing the market participant to access hedging opportunities in both timeframes. Further, this LTCS does not lead to restrictions in competition, in particular for access to long-term transmission rights, as the splitted long-term cross-zonal capacity is allocated in public auctions.

(7) Article 4(8) of the FCA Regulation requires that the expected impact of the LTCS on the objectives of the FCA Regulation is described. The impact is presented below (points (8) to (12) of this Whereas Section).

(8) The LTCS contributes to and does not in any way hamper the achievement of the objectives of Article 3 of the FCA Regulation. In particular, the LTCS serves the objectives of optimising the calculation and allocation of long-term transmission rights (Article 3(b) of the FCA Regulation), providing non-discriminatory access to long-term transmission rights (Article 3(c) of the FCA Regulation), respecting the need for a fair and orderly forward capacity allocation and orderly price formation (Article 3(e) of the FCA Regulation), ensuring and enhancing the transparency and reliability

of information on forward capacity allocation (Article 3(f) of the FCA Regulation) and contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union (Article 3(g) of the FCA Regulation).

(9) The LTCS serves the objective of optimising the calculation and allocation of long-term transmission rights in accordance with Article 3(b) of the FCA Regulation by using the Long-term CCM of the Baltic CCR for calculating the available long-term cross-zonal capacities and using these values as a point of departure for determining the capacities provided for the purpose of allocating LTTRs.

(10) The LTCS provides non-discriminatory access to LTTRs (Article 3(c) of the FCA Regulation) as there are no barriers for access to the auction of LTTRs if the conditions, cf. the Harmonised Allocations Rules, are fulfilled. Moreover it ensures fair and nondiscriminatory treatment of TSOs, the Agency, regulatory authorities and market participants (Article 3(d) of the FCA Regulation) as the rules provide no undue discrimination for market participants and allows for access to data by the Agency regulatory authorities and market participants.

(11) The LTCS contributes to the objective of respecting the need for a fair and orderly forward capacity allocation and price formation (Article 3(e) of the FCA Regulation) by making available in due time the cross-zonal capacity to be released in the long-term time frame and forward markets, where appropriate.

(12) The LTCS serves the objective of transparency and reliability of information (Article 3(f) of the FCA Regulation) as the LTCS determines the main principles and main processes for allocating LTTRs. The LTCS enables Baltic CCR TSOs to provide market participants with the same reliable information on cross-zonal capacities and allocation constraints for long-term allocation and forecasting purposes in a transparent way. To facilitate transparency, Baltic CCR TSOs will publish data to the market on a regular basis to help market participants to evaluate the LTTR process and long-term capacity forecasts. Baltic CCR TSOs will engage stakeholders in dialogue to specify necessary hedging needs to this effect.

(13) The LTCS does not hinder an efficient long-term operation in Baltic CCR and adjacent CCRs, and the development of the transmission system in the European Union (Article 3(g) of the FCA Regulation). The LTCS serves the objective of efficient long-term operation and development of the electricity transmission system and electricity sector in the European Union (Article 3 (g) of the FCA Regulation) by taking into account the Long – term CCM developed in accordance with Article 10 of the FCA Regulation and approved pursuant to Article 4(7)(a) of FCA Regulation when determining the capacities for the purpose of allocating LTTRs, and by contributing to the hedging opportunities of the market participants.

(14) In conclusion, the methodology for splitting rules contributes to the general objectives of the FCA Regulation to the benefit of market participants and electricity end consumers.

(15) The calculation of the LTTR volumes on the Finland–Estonia bidding zone border takes into account the technical capabilities of the two HVDC interconnectors (i.e. ESTLINK 1 and ESTLINK 2) of this border by limiting the volumes of the FI-EE LTTRs to reflect the maximum physical flow of electricity in a situation where only one interconnector is in use. A simultaneous outage of both ESTLINKs is unlikely, but considering the geopolitical situation and recent incidents, it is by no means impossible. Considering this, the concerned TSOs propose setting the FTR volumes at 200 MW for the annual product and the maximum of 150 MW for the monthly product, which in total corresponds to the volume of the smaller of the interconnectors. This approach ensures that the allocated long-term cross-zonal capacity should never be impacted by a loss of a single interconnector alone. Setting the FTR volumes at these levels ensures that, even in the event of a simultaneous outage of both ESTLINKs, the compensation obligations remain within the expected annual congestion income, safeguarding TSO financial stability. In addition, this approach is expected to improve the firmness of the FTRs from the market participants' point of view.

**SUBMIT THE FOLLOWING METHODOLOGY FOR SPLITTING RULES TO THE  
FINNISH, ESTONIAN AND LATVIAN BALTIC CCR REGULATORY AUTHORITIES:**

**TITLE I**

**General**

**Article 1**

**Subject matter and scope**

1. The LTCS is the methodology of Baltic CCR in accordance with Article 16(2) of the FCA Regulation.
2. This LTCS applies solely to the bidding zones borders:
  - a. Finland – Estonia
  - b. Estonia - Latvia
3. This LTCS covers the methodology for splitting capacity calculated as long-term cross-zonal capacity for the long-term time frame, for which the LTTRs are foreseen in the regional design of long-term transmission rights pursuant to Article 31 of FCA Regulation.

**Article 2**

**Definitions and interpretation**

1. For the purposes of the Proposal, the terms used shall have the meaning given to them in Article 2 of Regulation 2019/943 , Article 2 of the FCA Regulation, Article 2 of the CACM Regulation, Article 2 of the Harmonised Allocation Rules for long - term transmission rights in accordance with Article 51 of FCA Regulation (EU) and Article 2 of Commission Regulation (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council (hereafter referred to as "Transparency Regulation") and Article 2 of capacity calculation methodology developed in Baltic CCR in accordance with Article 20(2) of the CACM Regulation.
2. In addition, in this LTCS, the following terms shall have the meaning below:
  - a. "LTTR" means a Physical or a Financial Long Term Transmission Rights;
  - b. "HAR" means Harmonised Allocation Rules;
  - c. "SAP" means Single Allocation Platform;
  - d. "FCA Regulation" means guideline on Forward Capacity Allocation;
  - e. "Long-term CCM " means the Capacity Calculation Methodology in accordance with Article 10 of the FCA Regulation.
3. In this LTCS, unless the context requires otherwise:
  - a. the singular indicates the plural and vice versa;
  - b. headings are inserted for convenience only and do not affect the interpretation of this LTCS; and

- c. any reference to legislation, regulations, directives, orders, instruments, codes or any other enactment shall include any modification, extension or re-enactment of it when in force.

4. For the sake of clarity this LTCS does not affect TSOs' right to delegate all or part of their task in accordance with the Article 62 of the FCA Regulation. In this LTCS "TSO" shall refer to Transmission System Operator or to a third party whom the TSO has delegated task(s) to in accordance with the FCA Regulation, where applicable. However, the delegating TSO shall remain responsible for ensuring compliance with the obligations under the FCA Regulation and under the HAR.

## **TITLE 2**

### **Applying of capacity calculated for long-term time frame**

#### **Article 3**

##### **Applying of capacity calculated for long-term time frame**

1. The Baltic CCR TSOs shall apply the long term capacity calculated by the methodology set out by the Long-term CCM for each long term time frame as a point of departure for calculating the amount of LTTRs for the different time frames. This methodology applies to all time frames foreseen in the regional design of long-term transmission rights in accordance with Article 31(2) of the FCA Regulation.

2. The Baltic CCR TSOs shall apply the following procedure when splitting and issuing the amount of LTTRs for each different time frames:

- a. A week prior to the yearly allocation, the amount of yearly LTTRs for the upcoming yearly allocation shall be published to the market.
- b. If relevant, once a quarter and no later than two (2) Working Days prior to the quarterly allocation, the amount of quarterly LTTRs shall be publish to the market.
- c. Once a month and no later than two (2) Working Days prior to the monthly allocation, the amount of LTTRs with a monthly time frame shall be published to the market.
- d. In case other time frames than year, quarter and month are introduced, the amount of LTTRs within that time frame shall be published to the market no later than two working days prior to the allocation in the month before the time frame of where the LTTRs apply.

#### **Article 4**

##### **Methodology for splitting long-term cross-zonal capacity**

1. The relevant TSOs shall split the calculated long-term cross-zonal capacity for each forward capacity allocation by applying the methodology for splitting cross-zonal capacity pursuant to point 3 in this Article 4.

2. The splitting of long-term cross-zonal capacity shall be performed primarily by relevant TSOs. The relevant TSOs may delegate the splitting of long-term cross-zonal capacity to the coordinated capacity calculator provided that they have evaluated the effectiveness of this function as performed by the coordinated capacity calculator, in accordance with Article 62(1) of the FCA Regulation. Delegation to the coordinated capacity calculator (Baltic Regional Coordination Centre, hereafter referred to as "BRCC") shall only take place if the TSOs determine that the BRCC can effectively carry out this function.

3. The calculation of amount of LTTRs for each timeframe shall be done in the following way:

a. The long-term cross-zonal capacity (hereinafter referred to as "LTCZC") for respective timeframe and respective border shall be calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10.

b. The following splitting shares of long-term cross-zonal capacity for EE-LV border shall be applied when allocating yearly, quarterly and monthly shares of LTTRs capacity (in MW). When allocating shares of LTTR capacity, the limiting factor is the forecast value of LTCZC. For EE-LV border maximum % of LTCZC that can be reserved for Baltic frequency reserves market for balancing reserves sharing and exchange is set in the Methodology for the market-based allocation process of cross-zonal capacity for the exchange of balancing capacity for the Baltic CCR in accordance with Article 41(1) of the Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing:

$$LTTR_{Y(n)} = \min (\Omega * \min LTCZC_{Y(n)}; 300)$$

$$LTTR_{Q(n)} = \min (\Omega * \min LTCZC_{Q(n)} - LTTR_{Y(n)}; 50)$$

$$LTTR_{M(n)} = \min (\Omega * \min LTCZC_{M(n)} - LTTR_{Y(n)} - LTTR_{Q(n)}; 100)$$

Where:

**LTTR<sub>Y(n)</sub>** – LTTRs capacity offered in yearly timeframe for year n in MW;

**LTTR<sub>Q(n)</sub>** – LTTRs capacity offered in relevant quarterly timeframe for year n in MW;

**LTTR<sub>M(n)</sub>** – LTTRs capacity offered in relevant monthly timeframe for year n in MW;

**Ω** - the maximum actual share of cross-zonal capacity (as a percentage of day-ahead NTC) in the direction from Estonia to Latvia reserved for the exchange of balancing capacity within the Baltic CCR, per market time unit, during the six-month period preceding the month in which the forward capacity allocation takes place, excluding the top 1% of market time units with the highest allocated share of cross-zonal capacity;

**minLTCZC<sub>Y(n)</sub>** – the minimum forecasted monthly NTC value in MW of the long-term cross-zonal capacity for respective border and respective year (n) calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10;

**minLTCZC<sub>Q(n)</sub>** – the minimum forecasted monthly NTC value in MW of the long-term cross-zonal capacity for respective border and respective year (n) or quarter (n) calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10;

**minLTCZC<sub>M(n)</sub>** – the minimum forecasted daily NTC value in MW of the long-term cross-zonal capacity for respective border and respective month n calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10.

c. The following splitting shares of long-term cross-zonal capacity for FI-EE border shall be applied when allocating yearly and monthly shares of LTTRs capacity (in MW):

$$LTTR_{Y(n)} = \min (\min LTCZC_{Y(n)}; 200)$$

$$LTTR_{M(n)} = \min (\min LTCZC_{M(n)} - LTTR_{Y(n)}; 150)$$

Where:

**LTTR<sub>Y(n)</sub>** – LTTRs capacity offered in yearly timeframe for year n in MW;

**LTTR<sub>M(n)</sub>** – LTTRs capacity offered in relevant monthly timeframe for year n in MW;

**minLTCZC<sub>Y(n)</sub>** – the minimum forecasted monthly NTC value in MW of the long-term cross-zonal capacity for respective border and respective year (n) calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10;

**minLTCZC<sub>M(n)</sub>** – the minimum forecasted daily NTC value in MW of the long-term cross-zonal capacity for respective border and respective month n calculated according to the Long-term CCM of Baltic CCR, as stated in FCA Regulation Article 10.

## **Article 5**

### **Rules for avoiding undue discrimination of access to purchase of long term transmissions right**

1. In accordance with article 16(2c) of FCA Regulation there shall be no restrictions on the access to purchase LTTRs that lead to undue discrimination of access to purchase LTTRs or undue restrictions in competition between purchasers of LTTRs in the auctions of LTTRs.
2. All market players shall be given access to purchase LTTRs if they fulfil the general condition set out in Chapter 2 and 3 of the HAR.

## **Article 6**

### **Methodology for the validation of cross-zonal capacity allocated as LTTR's for long term time frame**

Baltic CCR TSOs shall perform the validation of amount of LTTRs on its bidding zone border(s) to ensure that the results of regional calculation of LTTRs and splitting between time frames will ensure operational security. When performing the validation, the TSO shall consider operational security, taking into account new and relevant information obtained during or after the most recent capacity calculation.

## **TITLE 3**

### **Miscellaneous**

## **Article 7**

### **Publication of data**

1. The TSOs shall, in compliance with Article 47 of the FCA Regulation and in accordance with Article 3(f) of the FCA Regulation, and in addition to the data items and definitions of Transparency Regulation, publish data regarding the LTTR auctions on a regular basis and as soon as possible.
2. The publication of the data referred to in paragraph 1 can be done on behalf of the TSOs on SAP's web page.

## **Article 8**

### **Capacity calculation process**

1. Within the capacity calculation process, reduction periods may be defined in accordance with HAR Article 30. The reduction periods will not be taken into account when using the LTCS cf. Article 4.
2. When the amount of LTTRs are provided to the SAP for the auction the reduction periods will be included in the final product. This ensures that the final product allocated to the market via the SAP includes reduction periods as given by the capacity calculation process.

## **TITLE 4**

### **Final provisions**

## **Article 9**

### **Publication and Implementation**

1. Baltic CCR TSOs shall publish the LTCS without undue delay after the Baltic CCR NRAs has approved the LTCS or a decision has been taken by the Agency for the Cooperation of Energy Regulators in accordance with Article 4(9), Article 4(10) and Article (11) of the FCA Regulation regarding the methodology.
2. The methodology will be implemented from the first LTTR auction after the Baltic CCR NRAs has approved the LTCS or a decision has been taken by the Agency for the Cooperation of Energy Regulators in accordance with Article 4(9), Article 4(10) and Article 4(11) of the FCA Regulation regarding the methodology.

## **Article 10**

### **Language**

The reference language for this LTCS shall be English. For the avoidance of doubt, where TSOs need to translate this LTCS into their national language(s), in the event of inconsistencies between the English version published by TSOs in accordance with Article 4(13) of the FCA Regulation and any version in another language, the relevant TSOs shall be obliged to dispel any inconsistencies by providing a revised translation of this LTCS to their relevant national regulatory authorities.