

Annex 1: I-SEM TSO & Interconnector Obligations under FCA Regulation

Section	Description	Article	EirGrid	SONI	EirGrid Interconnector Designated Activity Company	Moyle Interconnector Limited	Comment	RA Comments
General Provisions	Recitals	n/a					No obligations on TSOs/ICs	Non legally binding interpretative text. Relevant to all but does not contain legal obligations.
General Provisions	Subject Matter and Scope	1					No obligations on TSOs/ICs	This Article does not address TSOs.
General Provisions	Definitions	2	✓	✓	✓	✓	All TSO/IC obligation	Definitions need to apply to anyone undertaking a role within the Regulations and thus apply to all parties.
General Provisions	Objectives of forward capacity allocation	3	✓	✓	✓	✓	All TSO/IC obligation	Sets out framework for all actions undertaken in complying with the Regulation and therefore applies to all TSOs.
General Provisions	Adoption of Terms Conditions and Methodologies	4	✓	✓	✓	✓	All TSO/IC obligation	This Article is relevant to any party that has a function relevant to the development of any terms, conditions and/or methodology.
General Provisions	Stakeholder Involvement	5					No obligations on TSOs/ICs	This Article does not place direct obligations on TSOs.
General Provisions	Consultation	6	✓	✓	✓	✓	All TSO/IC obligation	This Article specifies the consultation procedures that TSOs must follow and therefore applies broadly to any party taking part in the development of any methodology.
General Provisions	Confidentiality Obligations	7	✓	✓	✓	✓	All TSO/IC obligation	This Article is important to make sure that all parties have due regard for confidentiality.
Forward Capacity Calculation	Capacity Calculation Regions	8	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. This is consistent with our assignment of responsibilities for CACM Article 15.
Forward Capacity Calculation	Capacity Calculation Timeframes	9	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Calculation	Capacity Calculation Methodology	10	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. This is consistent with our assignment of responsibilities for CACM Articles 20 and 21.
Forward Capacity Calculation	Reliability Margin Methodology	11	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. This is consistent with our assignment of responsibilities for CACM Article 22.
Forward Capacity Calculation	Methodologies for Operational Security Limits and Contingencies	12	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. This is consistent with our assignment of responsibilities for CACM Article 23.
Forward Capacity Calculation	Generation Shift Keys Methodology	13	✓	✓			Not relevant to Interconnectors	With the estimation of generation shift keys being undertaken by the SO (with input from generating units relevant to the capacity calculation), this Article is applicable to SOs only. This is consistent with our assignment of responsibilities for CACM Article 24.
Forward Capacity Calculation	Methodology for Remedial Action	14	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. This is consistent with our assignment of responsibilities for CACM Article 25.
Forward Capacity Calculation	Cross-Zonal Capacity Validation Methodology	15	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. Please refer to the CACM Article 26 decision.
Forward Capacity Calculation	Methodology for splitting long-term cross-zonal capacity	16			✓	✓	Obligation on Interconnector Owners with SOs being appropriately consulted throughout the process	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows. However, we note that SOs should be consulted throughout the process.
Forward Capacity Calculation	Generation and load data provision methodology	17	✓	✓			TSOs responsible for development of methodology	As generators provide generation and load data to SOs only, this Article does not apply to ICs. This is consistent with our assignment of responsibilities for CACM Article 16.
Forward Capacity Calculation	Common Grid Model Methodology	18	✓	✓	✓	✓	All TSO/IC obligation	The Common Grid Model will include the relevant parts of European Grids with forecasted production and consumption patterns for each market time unit. We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. This is consistent with our assignment of responsibilities for CACM Article 17.
Forward Capacity Calculation	Scenarios	19	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. This is consistent with our assignment of responsibilities for CACM Article 18.
Forward Capacity Calculation	Individual Grid Model	20	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. This is consistent with our assignment of responsibilities for CACM Article 19.
Forward Capacity Calculation	General Provisions	21	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and therefore the responsible parties for network security and the ICs in their capacity as managers of cross border electricity flows. This is consistent with our assignment of responsibilities for CACM Article 27.
Forward Capacity Calculation	Creation of a Common Grid Model	22	✓	✓	✓	✓	All TSO/IC obligation	All TSOs will provide data to facilitate the creation of individual grid models, while SOs will have additional responsibilities as the individual grid models are merged to form the common grid models. Please refer to the CACM Article 28 decision.
Forward Capacity Calculation	Regional calculations of long-term cross-zonal capacities	23(1) & (2)	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. Please refer to the CACM Article 29 decision.
Forward Capacity Calculation	Regional calculations of long-term cross-zonal capacities	23(3) & (4)	✓	✓			TSOs responsible as Coordinated Capacity Calculator	The current capacity calculation is an SO function and it is consistent to consider that this will remain an SO function at regional level or else a function delivered by a third party.
Forward Capacity Calculation	Validation and Delivery of cross-zonal capacity and split cross-zonal capacity	24(1),(2),(3),(5)	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Calculation	Validation and Delivery of cross-zonal capacity and split cross-zonal capacity	24(4)	✓	✓			TSOs responsible as Coordinated Capacity Calculator	The current capacity calculation is an SO function and it is consistent to consider that this will remain an SO function at regional level or else a function delivered by a third party.
Forward Capacity Calculation	Coordinated Curtailment of Cross-zonal Capacity	25(1),(2),(4)	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Calculation	Coordinated Curtailment of Cross-zonal Capacity	25(3) & (5)	✓	✓			TSOs responsible as Coordinated Capacity Calculator	The current capacity calculation is an SO function and it is consistent to consider that this will remain an SO function at regional level or else a function delivered by a third party.
Forward Capacity Calculation	Biennial Report on Capacity Calculation and Allocation	26(1) - (3)					TSOs/ICs not directly responsible (only as members of Entsoe and/or providers of information)	We consider that these provisions do not put obligations on TSOs. This is consistent with our assignment of responsibilities under CACM Article 31.
Forward Capacity Calculation	Biennial Report on Capacity Calculation and Allocation	26(4)	✓	✓	✓	✓	All TSOs/ICs responsible for quality of information	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. This is consistent with our assignment of responsibilities under CACM Article 31.
Forward Capacity Calculation	Biennial Report on Capacity Calculation and Allocation	26(5)					No obligations on TSOs/ICs	We consider that these provisions do not put obligations on TSOs. This is consistent with our assignment of responsibilities under CACM Article 31.
Forward Capacity Allocation	General Provisions	27	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	General Principles	28			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Inputs and Results	29			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Decision on Cross-zonal risk hedging opportunities	30			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.

Forward Capacity Allocation	Regional Design of Long-term Transmission Rights	31			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Physical Transmission Rights	32			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Financial transmission rights - Options	33			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows. Please refer to Articles 38-50 of the CACM decision.
Forward Capacity Allocation	Financial transmission rights - Obligations	34			✓	✓	No current obligation as LTTRs as FTR options only but FTR obligations not excluded in future	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows. Please refer to Articles 38-50 of the CACM decision.
Forward Capacity Allocation	Principles for Long-term Transmission Rights Remuneration	35			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows. Please refer to Article 23 of the CACM decision.
Forward Capacity Allocation	General Provisions for Physical Transmission Rights Nomination	36			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows. Please refer to Article 23 of the CACM decision.
Forward Capacity Allocation	Terms and Conditions for Participation in the Forward Capacity Allocation	37(1) & (3)					Obligation applies to market participants	We consider that these provisions do not put obligations on TSOs.
Forward Capacity Allocation	Terms and Conditions for Participation in the Forward Capacity Allocation	37 (2),(4) & (5)			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Submission of input data to the single allocation platform	38			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Operation of the forward capacity allocation	39			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Pricing of the long-term transmission rights	40			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Financial requirements and settlement	41			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Establishment of fallback procedures	42			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Return of long-term transmission rights	43(1) & (2)					Obligations apply to holders of LTTRs	We consider that these provisions do not put obligations on TSOs.
Forward Capacity Allocation	Return of long-term transmission rights	43(3)			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Transfer of long-term transmission rights	44(1), (3) & (4)					Obligations apply to holders of LTTRs/market participants	We consider that these provisions do not put obligations on TSOs.
Forward Capacity Allocation	Transfer of long-term transmission rights	44(2)			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Delivery of result	45			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Initiation of fallback procedures	46			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Forward Capacity Allocation	Publication of market information	47			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Single Allocation Platform	Establishment	48			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Single Allocation Platform	Functional requirements	49			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Single Allocation Platform	General tasks	50			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Harmonised Allocation Rules	Introduction of harmonised allocation rules	51			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Harmonised Allocation Rules	Requirements for the harmonised allocation rules	52			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Firmness of Allocated Cross-zonal Capacity	General firmness provisions	53			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Firmness of Allocated Cross-zonal Capacity	Definitions of caps	54			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Firmness of Allocated Cross-zonal Capacity	Compensation rules	55			✓	✓	Obligation on ICs	We consider this Article to be applicable to 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	56(1) - (4)	✓	✓	✓	✓	All TSO/IC Obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators 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	56(5)					No obligations on TSOs/ICs	We consider that these provisions do not put obligations on TSOs.
Congestion Income Distribution	Congestion income distribution methodology	57			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows. Please refer to Article 73 of the CACM decision.
Cost Recovery	General Provisions on Cost Recovery	58	✓	✓	✓	✓	All TSO/IC Obligation	As all TSOs may incur some costs associated with this Network Code, this Article applies to all TSOs.
Cost Recovery	Cost of establishing, developing and operating the single allocation platform	59			✓	✓	Obligation on ICs	We consider this Article to be applicable to the ICs in their capacity as managers of cross border electricity flows.
Cost Recovery	Cost of establishing and operating the coordinated capacity calculation process	60	✓	✓	✓	✓	All TSO/IC obligation	As all TSOs may incur costs associated with this Network Code, this Article applies to all TSOs.
Cost Recovery	Cost of ensuring firmness and remuneration of long-term transmission rights	61	✓	✓	✓	✓	All TSO/IC obligation	We consider this Article to be applicable to both the SOs in their capacity as real time system operators and the ICs in their capacity as managers of cross border electricity flows. This is consistent with our assignment of responsibilities for CACM Article 79.
Delegation of Tasks and Monitoring	Delegation of tasks	62	✓	✓	✓	✓	All TSO/IC obligation	Applicable to all TSOs as it is possible that they may want to delegate to a third party. This is consistent with our assignment of responsibilities for CACM Article 81.
Delegation of Tasks and Monitoring	Monitoring	63(1) - (3)					No obligations on TSOs/ICs	We consider that these provisions do not put obligations on TSOs. This is consistent with our assignment of responsibilities under CACM Article 82 (1)-(4) .
Delegation of Tasks and Monitoring	Monitoring	63(4)	✓	✓	✓	✓	All TSO/IC obligation	Assigned to all TSOs as all may be required to provide information. This is consistent with our assignment of responsibilities under CACM Article 82 (5)-(6) .
Final Provisions	Entry into force	64					No obligations on TSOs/ICs	We consider that these provisions do not put obligations on TSOs.

	TSO does not have relevant function
✓	TSO has relevant function