

COMMON POSITION PAPER OF THE CORE NATIONAL REGULATORY AUTHORITIES AND ELCOM

on

THE CONCEPT DESCRIPTION DOCUMENTATION FOR CONSIDERATION OF SWITZERLAND IN THE CORE CAPACITY CALCULATION REGION

in accordance with Article 13(2) of the Core Day-Ahead Capacity Calculation Methodology and Article 22(1) of the Swiss Electricity Supply Act

18 December 2025

1. Introduction and legal context

1.1 Introduction

This document elaborates a common position of the Core Regulatory Authorities (hereafter: "Core NRAs") and the Switzerland Regulatory Authority ElCom on the concept description documentation established by Core Transmission System Operators (hereafter: "Core TSOs") and the Swiss Transmission System Operator Swissgrid for the consideration of Switzerland in the Core capacity calculation region (hereafter: "the Swiss Consideration Package") dated 17th of October 2025.

In this position paper, the Core NRAs and ElCom agree on the amended enhanced coordination between Core TSOs and Swissgrid and on the concept description documentation as described in the Swiss Consideration Package in its version of 17 October 2025 as submitted by their respective TSOs pursuant to the procedural and voting requirements laid down in Article 13(2) of the Core DA CCM and Article 22(1) of the Swiss Electricity Supply Act¹. Where required on a national level, further legal acts will be issued by individual NRAs.

1.2 Legal context

As per Article 13 of the System Operation Guideline² (hereafter; "SOGL Regulation"), EU TSOs are required to conclude agreements with non-EU TSOs to fulfil the requirements set forth in the SOGL Regulation. This requirement is fulfilled by the conclusion of the so-called Synchronous Area Framework Agreement (SAFA) by all EU TSOs and non-EU TSOs of the Synchronous Area Continental Europe. In parallel the European Commission issued a letter, dated 16 July 2019, to ACER and ENTSO-E supporting the idea of enhanced cooperation in capacity calculation and laying out the requirements for such endeavour. Consequently, the Day-Ahead Capacity Calculation Methodology of the Core CCR (hereafter: "Core DA CCM") was amended in 2021. The amendment introduced a new Article 13(2) that opens the possibility of enhanced coordination between Core TSOs and a technical counterparty³. The implementation of such an enhanced coordination is subject to unanimous validation of all Core NRAs. Article 13(2) of the Core DA CCM is set out below for reference.

Article 13 - Consideration of non-Core bidding zone borders / Core day-ahead Capacity Calculation Methodology

2. *Where Core TSOs consider as essential to enhance coordination in day-ahead capacity calculation with a technical counterparty, such enhanced coordination shall be based on the consideration of network elements of the technical counterparty and/or network elements of (a) Core TSO(s) that is (are) significantly influenced*

¹ Stromversorgungsgesetz (StromVG) / Loi sur l'approvisionnement en électricité (LApEl) / Legge sull'approvvigionamento elettrico (LAEI)

² Commission Regulation (EU) 2017/1485 of 2 August 2017 establishing a guideline on electricity transmission system operation.

³ TSO which is not a Core TSO and operates in a country which is not a Member State of the European Union.

by the exchanges with the bidding zone managed by this technical counterparty. A concept description documentation shall be jointly established between all Core TSOs and the technical counterparty. The documentation shall include at least a clear description of:

- (a) the interfaces to this methodology, including the lists and the values of network elements and of all parameters to be considered,
- (b) common and individual procedures that are performed by the Core TSOs, the CCC and the technical counterparty,
- (c) the rights and obligations of the technical counterparty and of the Core TSOs in this respect,
- (d) the monitoring of the effects and performance of the application of this enhanced coordination.

If the technical counterparty operates in a country that applies the legal framework of the European Energy Market or has concluded an intergovernmental agreement on electricity markets with the European Union, the following provisions of Article 13(2) do not apply.

The concept description documentation is subject to unanimous validation by all Core regulatory authorities and it must be contractually agreed upon between all Core TSOs and the technical counterparty. Where the concept description documentation or elements thereof have not been unanimously validated by all Core regulatory authorities, the Core TSOs shall not enhance cooperation with a technical counterparty in day-ahead capacity calculation.

The concept description documentation shall be regularly reviewed by all Core TSOs and validated by all Core regulatory authorities. The respective next date of the review and the validation shall be specified in the concept description documentation.

Upon the unanimous validation by all Core regulatory authorities, all Core TSOs shall accordingly apply and consider the results from such an enhanced coordination in the day-ahead capacity calculation.

As a result, a set of high-level options on how to consider Swissgrid in the Core CCR was developed by the Core TSOs and discussed with ACER, the European Commission and the NRAs. This led to the invitation of Swiss parties to participate to the Core CCR meetings (on the dedicated and limited number of relevant topics) accompanied by a Letter of Intent between Core TSOs and Swissgrid on 12 December 2019 that defines how TSOs involved will work together. Among the high-level options, the so-called "A2+" concept was selected as the most suitable approach. This concept consists in having a distinct capacity calculation for the borders France-Switzerland, Germany-Switzerland, Austria-Switzerland (hereafter: "Swiss Northern Borders" or "SNB") and a cross-regional validation that enables the common validation of both Core and Swiss Northern Borders capacities.

Core NRAs and ElCom validated the concept description documentation for consideration of Switzerland in the Core Capacity Calculation according to their legal process based on a common position paper signed by ElCom on 15 October 2024 and by Core NRAs on 8 November 2024.

At the latest 12 months after the first validation of the validated concept description documentation, TSOs should review and send it for a new validation by all relevant NRAs⁴.

1.3 Process between Core CCR and Swiss parties

Because it is based on the consideration of network elements of the technical counterparty and/or specific network elements of Core TSO(s), Core NRAs unanimously agreed that the implementation of such an enhanced coordination, described in the so-called concept description documentation is subject to unanimous validation not only of all Core NRAs, but also of the third party NRA, i.e. ElCom.

Core NRAs and ElCom closely cooperated on the elaboration of this common position and agreed on the benefits of having a common paper providing evidence of their validation.

Core NRAs and ElCom agree on the amended concept description documentation, respectively pursuant to Article 13(2) of the Core DA CCM with a unanimous voting at the Core Energy Regulator's Regional Forum (hereafter: "CERRF") on the basis of Article 1.2 of the CERRF Rules of Procedure "*The CERRF may also be used as a platform for wider strategic consultation, cooperation and agreement of the Core NRAs*", and pursuant to Article 22(1) of the Swiss Electricity Supply Act by ElCom.

With this position paper Core NRAs and ElCom agree on the amended enhanced coordination between Core TSOs and Swissgrid as described in the Swiss Consideration Package according to their legal processes.

2. The amended Swiss Consideration Package

The amended Swiss Consideration Package was received by the last Core Regulatory Authority on 15 December 2025 and on 5 December 2025 by ElCom. It consists of several documents:

- the Swiss Northern Borders NTC calculation methodology (hereafter: "SNB NTC calculation methodology") including a request for amendment, a track change version and a clean version;
- the Cross-Regional Validation methodology (hereafter: "CRV methodology") including a request for amendment, a track change version and a clean version; and
- an explanatory note.

2.1 The SNB NTC calculation methodology

The amended SNB NTC calculation methodology introduces a new mandatory review of the methodology at latest 12 months after the validation of the amended package.

⁴ Article 19, paragraph 4 of the Swiss Northern Borders NTC capacity calculation methodology and Article 16, paragraph 4 of the Core-SNB Cross-Regional Validation Methodology.

2.2 The CRV methodology

The amended CRV methodology introduces an additional, transitional validation process. The CRV amendments introduce a new Article 17 'Interim Implementation' that describes the conditions for Swissgrid to participate in the process of individual validation, pursuant to Article 20(6a) of the Core DA CCM.

Article 17 defines the rules to abide during the individual validation performed by Swissgrid:

- Swissgrid shall use the reference flows used for determining the RAM in accordance with Article 19 of the Core DA CCM;
- Swissgrid shall consider all available costly and non-costly remedial actions before adding a CNEC to the final list of the CNECs;
- Swissgrid shall apply the concept of Relative Sharing Key pursuant to Article 13(3) of the CRV methodology when determining the IVA;
- The CNEC submitted by Swissgrid to the Core CCR shall have a minimum RAM available for Core trade of 20% of Fmax.

Article 17 also establishes several transparency requirements and conditions to the participation of Swissgrid:

- Swissgrid shall ensure a sufficient level of transparency by complying with Articles 25, 26 and 27 of the Core DA CCM and by providing a monthly report to Core NRAs and ElCom on its individual validation process;
- The CNECs submitted by Swissgrid to the Core CCR shall be identified as only-CH CNEC;
- Swissgrid is allowed to participate in the Core day-ahead individual validation until the end of 2026. The participation can be suspended upon a justified request from any Core TSO or NRA.

In addition, the CRV amendment consists in the following changes:

- (a) The 'Whereas' section is amended to introduce a new paragraph which explains the context of the implementation of the transitional validation process;
- (b) Article 2 is amended to introduce the definition 'Individual Validation Adjustment' ('IVA');
- (c) Article 16 is amended to foresee a new review of the methodology at the latest in one year.

3. The Core NRAs and EICom position

Core NRAs and EICom have closely cooperated and coordinated to assess the amended Swiss Consideration Package.

Core NRAs and EICom regret that the CRV methodology cannot be fully implemented by the target deadline. However, Core NRAs and EICom acknowledge the need for a method to enable Swissgrid ensuring its grid security and thus a need for an interim implementation of the CRV methodology.

Core NRAs and EICom accept the Core TSOs and Swissgrid proposal of Swissgrid being allowed to participate in the process of individual validation pursuant to Article 20(6a) of the Core DA CCM. The proposal is applying the fundamental principles of the CRV methodology and building on the existing tools and processes thus fastening its implementation.

The monitoring requirements and the conditions of application of the interim implementation should provide a transparent and balanced framework for Core TSOs and Swissgrid. The limited duration of the interim implementation and the upcoming mandatory review of the Swiss Consideration Package ensure that Core TSOs and Core NRAs, Swissgrid and EICom will evaluate the solution and its results to define whether it should be prolonged, and if necessary amended.

4. Conclusions

Core NRAs and EICom have consulted, closely cooperated and jointly coordinated to define their position on the amendment of the Swiss Consideration Package. Core NRAs and EICom welcome the amendment of the cooperation between the Core TSOs and Swissgrid as technical counterpart.

With this position paper, Core NRAs and EICom, pursuant to Article 13(2) of the Core DA CCM for the Core Parties and to Articles 20(1) and 22(1) of the Swiss Electricity Supply Act for the Swiss Party, unanimously agree on the enhanced coordination between Core TSOs and Swissgrid and validate the amended concept description documentation as described in the Swiss Consideration Package annexed to this document in its version of 17 October 2025 as submitted by their respective TSOs pursuant to the procedural and voting requirements laid down in Article 13(2) of the Core DA CCM and Article 22(1) of the Swiss Electricity Supply Act⁵. Validation by NRAs in the meaning of this position paper does not necessarily entail any sort of sovereign decision of a Core NRA. However, where required on a national level, further legal acts will be issued by individual NRAs.

In line with Article 13(2) of the Core DA CCM and by mutual agreement with EICom, the Swiss Consideration Package shall be regularly reviewed. Therefore, by December 2026 the Swiss

⁵ Stromversorgungsgesetz (StromVG) / Loi sur l'approvisionnement en électricité (LApEl) / Legge sull'approvvigionamento elettrico (LAEI)

Consideration Package - reviewed and potentially amended - should be submitted to Core NRAs and to ElCom.

5. Annex

- **First amendment of the SNB NTC capacity calculation Methodology** in accordance with Article 13(2) of the first amendment of the Day-Ahead Capacity Calculation Methodology of the Core Capacity Calculation Region of 10 May 2021 – 17 October 2025
- **SNB NTC capacity calculation Methodology** in accordance with Article 13(2) of the first amendment of the Day-Ahead Capacity Calculation Methodology of the Core Capacity Calculation Region of 10 May 2021 – 17 October 2025 – Complete version
- **SNB NTC capacity calculation Methodology** in accordance with Article 13(2) of the first amendment of the Day-Ahead Capacity Calculation Methodology of the Core Capacity Calculation Region of 10 May 2021 – 17 October 2025 – Track-change version
- **Explanatory Document** to the first amendment of the conceptual package for consideration of Switzerland in Core Capacity Calculation Region according to the Core DA CCM Article 13(2)
- **First amendment of the Core-SNB Cross-Regional Validation Methodology** in accordance with Article 13(2) of the first amendment of the Day-Ahead Capacity Calculation Methodology of the Core Capacity Calculation Region of 10 May 2021 – 17 October 2025
- **Core-SNB Cross-Regional Validation Methodology** in accordance with Article 13(2) of the first amendment of the Day-Ahead Capacity Calculation Methodology of the Core Capacity Calculation Region of 10 May 2021 – 17 October 2025 – Complete version
- **Core-SNB Cross-Regional Validation Methodology** in accordance with Article 13(2) of the first amendment of the Day-Ahead Capacity Calculation Methodology of the Core Capacity Calculation Region of 10 May 2021 – 17 October 2025 – Track-change version

**Validation by the Core National Regulatory Authorities
of the Concept Description Documentation for Consideration of
Switzerland in the Core Capacity Calculation Region
in accordance with Article 13(2) of the Core Day-Ahead Capacity
Calculation Methodology
based on the common position paper of the Core National Regulatory
Authorities and ElCom**

signed for and on behalf of
Core NRAs



Sven Kaiser

Chairman of the Core Energy Regulators' Regional Forum

on 26 January 2026

Validation by ElCom

of the Concept Description Documentation for Consideration of Switzerland in the Core Capacity Calculation Region

in accordance with Article 22(1) of the Swiss Electricity Supply Act
based on the common position paper of the Core National Regulatory
Authorities and Elcom

signed for and on behalf of
ElCom



Werner Lüginbühl

President



Urs Meister

Director

on 20.01.2026

on 20.01.2026