

**Form for the submission of comments to the proposed
Multiple NEMO Arrangement (MNA) for the Croatian bidding zone in accordance with
Article 45 and Article 57 of the Commission Regulation (EU) 2015/1222 of 24 July 2015
establishing a Guideline on Capacity Allocation and Congestion Management**

FORM FOR PARTICIPATION IN CONSULTATION WITH STAKEHOLDERS	
Title of proposed regulation or enactment	<i>Multiple NEMO Arrangement (MNA) for the Croatian bidding zone in accordance with Article 45 and Article 57 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a Guideline on Capacity Allocation and Congestion Management</i>
Name of the body responsible for writing the proposal	<i>Croatian Transmission System Operator Plc.</i>
Title or first and last name of the stakeholders representative	<i>HRVATSKA BURZA ELEKTRIČNE ENERGIJE D.O.O.</i>
Address of the stakeholders representative	<i>Slavonska avenija 6/A, 10000 Zagreb, Hrvatska</i>
First and last name of the person (persons) drawing the comments or person authorised to represent the stakeholders representative	<i>Ante Mikulić</i>
Interest, that is category and number of users represented by you	<i>Nominated Electricity Market Operator (NEMO) operating organised electricity markets already in Croatia</i>
Permission to publish these comments and suggestions with the name of the stakeholder representative or anonymously (write + in front of the option chosen)	<input checked="" type="checkbox"/> <i>Publication with the name of the stakeholders representative</i>
	<input type="checkbox"/> <i>Anonymous publication</i>
Date:	<i>19.12.2025</i>


(signature of authorised person)

Note:

1. Please enter below general comments to a proposed regulation or enactment and suggestions for individual articles. Tables can be expanded.

General comments to the proposed regulation or enactment

Overall, we believe that the main objectives are appropriately addressed. We have nevertheless submitted a few minor amendments and suggestions for improvement, which we consider could further enhance clarity and effectiveness, without affecting the overall approach of the proposal.

Comments and suggestions for individual articles in the regulations or enactments with explanation that is supporting documentation

Preamble	<p>(11) added words: CCPs and SA, Electricity Market Act, Proposal for text with amendments:</p> <p>“(11) In Croatia, the role of the Electricity Market Operator is performed by a separate entity, Croatian electricity market operator Ltd. (HROTE). All NEMOs, CCPs and SA must comply with the provisions of the applicable regulation Rules on electricity market organization (Official Gazette of the Republic of Croatia, No. 107/19 and 36/20[LŠ2.1]), and Electricity Market Act (Official Gazette of the Republic of Croatia, br. 111/21, 83/23, 17/25) respectively, Rules on wholesale electricity market organization which shall enter into force upon the termination of the validity of (Official Gazette of the Republic of Croatia, No. 107/19 and 36/20) (hereinafter collectively referred to as: Market Rules), which govern the method for the implementation of public utility service of the electricity market operator.”</p> <p>(12) We propose changing CCR Core to CCR Central Europe in accordance with ACER decision from December on the new organisation of CCR.</p> <p>Established by ACER’s decision of 16 December 2025, which sets the reference as CCR Central Europe – Amendment concerning the further merger of CCR Core and CCR Italy North into the CCR CE.</p>
Article 1	
Article 2	We suggest adding additional definitions mentioned throughout the MNA, including Croatian NEMOs, CMM, and SOB.
Article 3	
Article 4	<p>(2) added words: CCPs, SA and Electricity Market Act, Proposal for text with amendments:</p> <p>(2) Each NEMO, CCP and SA providing services within Croatia bidding zone shall comply with all conditions and obligations laid down in Market Rules and Electricity Market Act. Non-compliance with these provisions shall preclude the NEMO from carrying out any operational activities on the electricity market within the Republic of Croatia.</p>
Article 5	
Article 6	
Article 7	<p>(1) The sentence at the end of the text has been expanded.; proposed text with amendments:</p> <p>(1) In accordance with Article 7(1) and Article 68(1) and (2) of the CACM Regulation, each NEMO offering services in the Croatian bidding zone shall be responsible for ensuring clearing and settlement of energy exchanges resulting from the single day-ahead coupling. Such clearing and settlement shall be performed either directly by the NEMO acting as a Central Counter Party (CCP) or by a designated CCP acting on its behalf, in accordance with Croatian market regulations.</p>
Article 8	<p>We propose that a new point 7 be added as follows:</p> <p>(7) HOPS in the Croatian bidding zone applies the principle of ‘Nomination on Behalf’ with respect to all scheduled exchanges resulting from Single Intraday Market Coupling (SIDC) of Intraday Continuous Trading.</p>
Article 9	
Article 10	
Article 11	

Article 12	
Article 13	(1) Added words: Croatian legislation, Proposal for text with amendments: (1) Each NEMO offering services in Croatia shall be a full member of the Single Intraday Coupling (SIDC) and implement the Single Intraday Coupling process in accordance with the CACM Regulation and Croatian legislation.
Article 14	
Article 15	
Article 16	
Article 17	
Article 18	
Article 19	
Article 20	