

Gas Natural Fenosa (GNF) would like to thank ACER for this opportunity to share its vision on the TSOs' proposal for intraday cross-zonal gate opening and closure times (ID CZ GOT/GCT).

GNF considers that the priority of the harmonization ID CZ GOT and GCT among different CCRs is to allow a real XB ID European market, giving the same opportunities to all market participants. Establishing unjustified requirements would prevent European consumers from benefitting from efficiency improvements.

GNF understands that TSOs need a period to solve internal network constraints before setting the available capacity in the borders, and this period is quite different depending on the number of the borders managed by each TSO and the size of each regional power system. On the other hand, these facts shouldn't be an unsurmountable problem to find a trade-off between grid security and market efficiency setting an earlier GOT than 22:00.

Finally, GNF also considers that harmonization of GOT should never affect the internal markets and procedures to solve internal network constraints. The XB ID market should not open before solving network constraints because this fact can affect the capacity calculation and distort competition. This requirement doesn't mean that if certain CCRs are able to open the ID market before the European harmonized GOT, they can do it.

#### Consultation questions:

### **1. Do you find it reasonable to apply transitional GOTs which can be after 15:00 D-1 in order to give TSOs sufficient time to gain operational experience with congestion management procedures and intraday capacity calculation?**

Some Capacity Calculation Regions will have strong difficulties to change all the market and system procedures before GOT in order to have it at 15:00 D-1. It would be challenging having a transitional GOT at 18:00 D-1 to give some TSOs sufficient time to find out all the data needed before intraday.

### **2. Do you consider the proposed GOT in the Baltic, Channel and Hansa CCRs ambitious enough or could TSOs on both sides of the bidding zone borders in those CCRs implement internal GOTs at 15:00 D-1?**

We would recommend a harmonized GOT for all the bidding zones, but in case TSOs could not arrange their processes before the harmonized GOT, they should reach an agreement with the corresponding NRA in order to having GOT at a different time, as an exception.

### **3. Do you consider that TSOs could further optimise their planned capacity calculation and congestion management processes to enable a transitional GOT in some CCRs to be set to 21:00 or even earlier?**

We also share the view of the Agency that the time required for TSOs congestion management and capacity calculation processes (i.e. from 15:30 to 22:00) seems

excessively long. We agree in a transitional GOT to be set at 21:00 or even earlier, but it should be established a limit period to set the harmonized GOT.

**4. Which option for the harmonisation of GOT do you prefer? Please, explain thoroughly why or, alternatively, propose a new concrete timing and add the reasoning for such a choice.**

We think there should be a certain time for TSO to study which could be the earliest GOT they can afford and how long would take for them to move to the harmonized GOT. This study could take a couple of months and will establish a more precise timing.

In any case, if we have to choose, we consider Option A (The harmonized GOT shall be implemented within 12 months after the entry into force of the Agency's decision) giving TSOs time to adjust their procedures.

**5. Do you consider it acceptable that each CCR can have a different target date for implementing the harmonised GOT, depending on specific circumstances in such CCR?**

Some CCR can have a transitional GOT, but a deadline should be defined to have all the TSO's with the same GOT.

**6. Do you agree with the exception from the harmonised GCTs and do you see other bidding zone borders than the EE-FI border where this exception could apply? If so, please explain why.**

The target of a harmonized GCT is to allow the full integration of CCR in a European ID market. In this line GCT should be the same for all TSO's trying to avoid the exceptions.