

ACER consultation - Intraday Cross-Zonal Gate Opening and Gate Closure Times

EPEX SPOT answers

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?

EPEX SPOT has been organizing cross border intraday power markets since 2010. The intraday continuous coupling offers implicitly the interconnexion capacity not already used at previous timeframes. For that reason, Intraday interconnexion capacity is often scarce.

TSOs have the possibility to improve their capacity calculation after Day-ahead, once day-ahead nominations have been performed. This represents a key milestone so that the market is given a better chance to benefit from some interconnexion capacity.

Therefore, it is of the utmost importance to let TSOs perform properly their calculations for intraday cross border capacity, even if it means that the intraday cross border should open later than 15.00 D-1.

If TSOs are not given the chance to improve their calculations, the cross border intraday markets will open at 15.00 without much interconnexion capacity, which would be useless for interconnected markets.

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?

(22:00 D-1 for Channel and 18:00 D-1 for Hansa and Baltic)

It falls under the responsibility of TSOs to define which is the proper timing to open intraday cross border markets given their calculations constraints.

EPEX SPOT has no element to judge that the proposed timings should not be relevant.

Current intraday cross zonal gate opening times on the Swiss, French, German, Austrian, Belgium, Dutch markets are currently in the evening, and it does not prevent the liquidity to develop.

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?

It falls under the responsibility of TSOs to define which is the proper timing to open intraday cross border markets given their calculations constraints. EPEX SPOT supports TSOs in their recalculations activities as described in question 1.

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.

It is not the opinion of EPEX SPOT that the earliest possible GOT in the afternoon will safeguard trading opportunities. To the contrary as explained in question 1, if the cross zonal GOT is too early in the afternoon, the risk is high that there will be no interconnexion capacity left at all because TSOs will not have sufficient time for their recalculation process.

Therefore EPEX SPOT cannot give any feedback on the following three implementation options for the harmonised GOT at 15:00 D-1. In any case, if TSOs can improve their intraday cross border capacity recalculation process, it is up to them to define which timeframe they can achieve at which time horizon.

However, as the target, EPEX SPOT supports an harmonization of the GOT in order to accomplish the completion of the single energy market.

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?

EPEX SPOT consider that it is acceptable that each CCR can have a different target date for implementing the harmonised GOT, depending on specific circumstances in the above mentioned CCR. Pragmatism must be applied in order to leave room to improvements where they can take place.

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.

EPEX SPOT consider that it is acceptable that each CCR can have a different target date for implementing the harmonised GCT, depending on specific circumstances in each CCR. Pragmatism must be applied in order to leave room to improvements where they can take place.