

Nordic NRAs response to consultation from ACER on IDCZGTs

The Nordic energy regulatory authorities (“Nordic NRAs”), Energitilsynet, Energimarknadsinspektionen, Energiavirasto and Norges vassdrags- og energidirektorat, would like to thank ACER for the opportunity to share our views on the Intraday Cross-Zonal Gate Opening and Closing Times (IDCZGT).

General view

The Nordic NRAs are of the opinion that:

- The ideal pan-European IDCZGOT should be 15:00 D-1. The intraday market can open by using residual capacity from DA.

- If no ambitious pan-European IDCZGOT is possible in this decision, the Nordic NRAs propose the following steps:
 - Set a future harmonized default IDCZGOT at 15:00 D-1 (the earliest IDCZGOT at CCR level) accompanied with an implementation plan in order to reach the default IDCZGOT.

 - The IDCZGOT in CCR Nordic can under no circumstances be later than 15:00 D-1.

Below, we have stated our position on the specific consultation questions. Further, we enclose the NordReg position paper on local intraday markets and competition among NEMOs, which we believe is relevant to the IDCZGOT issue.

Topic 1: Feasibility of earlier regional GOTs

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?*

The Nordic NRAs can accept that for a short transitional period in other CCR’s the GOTs can be after 15:00 D-1, however urges this period to be short. The future target should however be developed in direction to 15:00 D-1.

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 do not consider a later GOT in Hansa CCR or Baltic CCR to be properly justified, and we do not see any reasons for setting it later than 15:00.

The Hansa CCR includes DC-interconnectors with perfectly controllable flows and one radial AC with no loopflows. This implies less uncertainty for the TSOs in their capacity calculation and in principle it should mean that the performed recalculation of capacity in the intraday timeframe will not change the capacities significantly. We

are aware that flows over the DC-interconnectors will also affect the AC-grid on both sides. However it will not affect the AC-grid differently than trade within the AC-grid itself. The trade in Nordic region is to open at 15, and the trade inside Germany bidding zone opens at 15. So we have two connected AC-grids where trade opens at 15, which are connected by controllable DC-interconnectors; then the trade on these DC-interconnectors should also be able to open at 15.

The TSOs have stated before that the reason for setting the GOT at 18 instead of 15 is due to capacity recalculation processes. We do not agree with this, as the capacity recalculation is currently envisaged to be performed later than 18. Even with a GOT at 18, the market would open before the recalculation has taken place, so with this reasoning it could also open at 15. The processes which the TSOs will perform between 15 and 18 are related to the individual and common grid models for the intraday timeframe. As these processes can run with an open intraday market inside a bidding zone, they should also be able to run with trade on DC-interconnectors.

- 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?*

The Nordic NRAs are of the opinion that it should be possible to achieve an earlier GOT.

Topic 2: Establishment of a EU-wide harmonised GOT and clarification of its effective implementation date

- 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.*

From the Nordic NRAs point of view the implementation of a harmonized GOT should be the same date as CCM for ID timeframe is implemented.

- 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?*

The Nordic NRAs acknowledge that each CCR might have different target date for implementing the default. However, the TSOs should work actively towards the target default and implement it sooner if possible.

It is not acceptable for the Nordic NRAs to have a GOT later than what is possible today.

Topic 3: Review of the gate closure times for specific bidding zone borders

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 Nordic NRAs agrees with the exception from the harmonised GCT, however it should be an option for other borders as well to have a GCT closer to the operating hour to ensure that the GCT is flexible and does not rule out any other borders where a shorter GCT could be possible in the future.