

Dear Sir/Madam,

On behalf of the Association of Energy Trading we would like to submit our comments to the proposal for cross-zonal gate opening and gate closure times for intraday coupling.

These are the answers to consultation questions:

1. Yes, we find it reasonable to apply transitional GOTs, to give TSOs sufficient time to gain operational experience with congestion management procedures and intraday capacity calculation.
2. Proposed GOT in the Baltic, Channel and Hansa CCRs are considered as not ambitious enough and 15:00 D-1 should be proposed as default gate. However, that reflects purely trading approach and always technical or system restraint or circumstances should predominate while taking decision.
3. In our opinion they should optimise their planned capacity calculation and congestion management processes as far as technical possibilities are concerned. Hence, whether they could, we have no opinion.
4. Same as the importance of the earliest possible GOT for the sake of trading opportunities, also the shortest possible implementation period for the harmonised GOT is welcome. Feasibility and effectiveness has priority as in p.3.
5. Since thorough and reliable explanation of specific circumstances is delivered it is considered acceptable that each CCR can have a different target date for implementing harmonised GOT.
6. We agree with the exception from the harmonised GCTs provided good justification. Considering all technical and balancing limitations, from the trading point of view the closer CGT to real time the better.

We hope you will find our suggestions worthwhile.