

Answer from the All NEMO Committee to the ACER's consultation on IDCZGT for the "All TSOs' proposal for intraday cross-zonal gate opening and gate closure times in accordance with Article 59 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management"

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?

NEMOs agree that it is desirable to have the harmonized GOT implemented on all bidding zone borders that bring opportunities to trade to market participants as soon as the day-ahead trading has closed. At the same time, the difference in complexity of the CCR network model and, consequently, of the TSOs needed time for capacity calculation, should be considered also when establishing a common GOT. In this respect, we consider that on relevant cross zonal borders GOTs can be allowed either at 15:00 D-1 or later.

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?

All NEMOs opinion is that TSOs has a comprehensive view in order to respond to stated question adequately.

As objective of the SIDC is to improve trading opportunities at European level TSOs are challenged to make their process more efficient and establish improvement targets. We find that TSOs should explore all possibilities of earlier GOT (21:00 or earlier) to provide market participants with sufficient time.

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?

Having in mind all factors involved in this assessment (e.g. opportunities to trade for participants without work having organized in shifts, organizing auctions for capacity pricing in ID timeframe, enough time for TSOs calculation processes), we find acceptable that each CCR can have a different target date for implementing the harmonized GOT subject to harmonization to occur within a transitional period defined by the Agency.

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.

We agree with the exception and given that GCT shall be at the earliest 60 min before real time, opportunities to have later GCTs should be explored also on other borders, where possible.