

Dear Sir or Madam,

UNIPER would like to thank ACER for the opportunity to provide our views on the TSOs' proposal for intraday cross-zonal gate opening and closure times (ID CZ GOT/GCT). Please find below our response regarding the for us relevant questions.

*Q1: 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?*

Answer: No, Uniper does not find it reasonable. In general, interim steps should be avoided because these create additional effort for the required adaptations. It should be considered that each change has an impact on internal processes and external interfaces in this connection. Hence it would be more efficient and reasonable that TSO would obtain sufficient time to implement the final GOT at 15:00 D-1 directly.

The aim should be that a reliable and sustainable system exist without ongoing changes.

*Q4: 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.*

*a) The harmonised GOT shall be implemented within 12 months after the entry into force of the Agency's decision;*

*b) The harmonised GOT shall be implemented within 36 months after the entry into force of the Agency's decision;*

*c) The harmonised GOT shall be implemented in a CCR within 6 months after the implementation of intraday capacity calculation in that CCR.*

Answer: Option a should be chosen because, 12 month after the entry into force is a sufficient period for the implementation of the harmonisation of GOT at 15:00 D-1 in our view.

Furthermore, a reliable and sustainable system should apply as soon as possible to create trust which is important for investment decisions. Therefore, the period of uncertainty in the market should be as short as possible.

Furthermore, the key for an efficient market is that proper and consistent GOT and GCT for the common European energy and reserve market are defined.

*Q5: 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?*

Answer: Different target dates for implementing the harmonised GOT would be acceptable because this mirrors the current situation in Europe. Nevertheless, it should be aimed to avoid these.

Kind regards