

Warsaw, 30th January 2018

**DEPARTMENT OF MARKETS DEVELOPMENT
AND CONSUMER ISSUES**

**Agency for the Cooperation
of Energy Regulators**

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by e-mail only

As a contribution to the consultation preceding Agency's decision on proposal for the cross-zonal gate opening and gate closure times for intraday coupling developed by all Transmission System Operators (TSOs), in accordance with Article 59 (1) of the Commission Regulation (EU) 2015/1222 establishing a guideline on capacity allocation and congestion management (CACM Regulation), Energy Regulatory Office (URE) would like to present following answers to the consultation questions.

Consultation question number 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?*

Answer: Yes.

Intraday cross-zonal gate opening and gate closure times can and ought to be harmonised in the whole EU as a target solution which should be introduced at the moment in which it would bring more advantages to the Internal Electricity Market than disadvantages and therefore it will contribute to CACM Regulation objectives more fully. URE believes that harmonisation cannot be achieved effectively at present as it will affect the performance of processes conducted by TSOs in negative way as well as it will threaten the correct functioning of interconnected electricity systems. In URE's view these are sufficient reasons to introduce exceptions from EU wide harmonisation for particular capacity calculations regions especially since coordinated capacity calculation methodology is not yet implemented.

Consultation question number 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?*

Answer: Yes, URE considers the proposed gate opening time in the Baltic and Hansa CCRs is not only ambitious enough but rather challenging. URE is of the opinion, taking into consideration the fact that between Poland and Sweden (CCR Hansa) and Poland and Lithuania (CCR Baltic) HVDC interconnections are in place, that gate opening time in these regions should be maintained at 18:00 as it is proposed by TSOs. The risk of setting gate opening times in these CCRs earlier is that TSOs will be forced to make capacities available in a very guarded manner due to the lack of precise information as the processes conducted by TSOs are performed sequentially and cannot be finalised before these times.



Consultation question number 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?*

Answer: No.

Referring to CCR Core in URE's view gate opening time should be set at 22:00. The argumentation of this statement is connected with the integrated scheduling process of central dispatch system and process of the capacity calculation in CCR Core. Only gate opening time at 22:00 will ensure to provide reliable data for the market participants, based on the outcome of concluded processes related to day-ahead market, including plan of necessary remedial actions which should be undertaken by TSOs in order to secure the outcome of the capacity calculation of day-ahead market. If gate opening time was set before 22:00, the output data of capacity calculation and other processes would be imprecise and would have to be changed after the gate opening time, which would not be beneficial for market participants.

Consultation question number 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.*

Answer: None of the proposed options.

Congestion management procedures and intraday capacity calculation and other processes conducted by TSOs should be performed more efficiently but as we all are aware design and implementation of many projects which will allow to set gate opening times at earlier hour are still pending. TSOs need time to develop these projects and adjust to them. After TSOs are fully operational in these fields intraday cross-zonal gate opening times can be unified at earlier hour.

Consultation question number 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?*

Answer: Yes.

Consultation question number 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.*

Answer: Yes.

