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Public Consultation on Intraday Cross-Zonal Gate Opening and Gate Closure Times

Dear Sir or Madam

Axpo thanks ACER for the opportunity to contribute to the consultation on the future Intraday Cross-Zonal Gate Opening and Gate Closure Times.

Please find below our comments on each question:

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?

In principal, we agree with the application of a transitional GOT to give TSOs time to gain operational experience. However, the GOT should not be later than 17:00 D-1 in order to give market participants the possibility to make use of trading opportunities as soon as possible. With GOT outside business hours, smaller market participants could be pushed out of the market, reducing liquidity in the night and early morning hours of the intraday market.

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?

No comment

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?

As stated above (question 1), GOT should be within business hours in all CCRs.

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.

We prefer the implementation of the harmonised GOT as soon as possible to create a level-playing field for all market participants.

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?

No comment

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.

No comment

Yours sincerely
Axpo Trading AG

