

## CRE's answers to the ACER's public consultation on the intraday cross-zonal gate opening and closure times

- 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?**

Our opinion is that the aim is to have an integrated intraday market, with:

- early GOT, in order to let sufficient flexibility to the market players,
- good capacity calculation methodologies, to maximise the trading opportunities after day-ahead
- no interruption of continuous trading (or only the ones that are CACM-compliant)
- products with the granularity of the ISP, in order to meet market players' needs in terms of flexibility.

In this respect, we share ACER's views. However, we consider that those goals cannot be all reached at the same time. Our opinion is that TSOs lack experience with some new processes developed in the framework of the implementation of network codes. This implies that we support the pragmatic approach, which consists in letting them gain experience with some processes, principally the capacity calculation in intraday (which today does not exist, as only the residual from day-ahead is proposed to the market). We would not like to be in a situation where some contradictory signals are sent to the TSOs, ie. on one hand pushing them for having robust intraday capacity calculation methodologies, in order to maximise the intraday trading possibilities and on the other hand, asking them to shorten dramatically the processes in order to meet the 15:00 GOT. Our priority being the development and implementation of the capacity calculation methodologies, we favour the idea of transitional GOT, after 15:00 D-1.

- 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?**

CRE considers that the GOT for the Channel CCR shall be set in order to allow for a good intraday capacity recalculation.

- 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?**

Today, at the borders between France-Belgium, France-Germany and France-Switzerland, where an implicit continuous allocation (similar to the XBID project allocation) is implemented for years, the GOT is set at 21:00 D-1. We would support the status quo at those borders.

However, as mentioned in the answer 1, we do not consider, based on the information given by the TSOs, that it is possible in meshed networks, often congested after day-ahead, to shorten the processes of intraday capacity recalculation in order to meet a GOT earlier than 21:00 D-1. We thus consider that at those borders where capacity calculation is of utmost importance to increase the available capacity, 21:00 D-1 shall be favoured.

- 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 would support an option which links the harmonisation of the GOT with the implementation, within a CCR, of the intraday capacity calculation methodologies.

However, we consider that the timeline proposed in the option c), ie. Implementation of the harmonised GOT 6-months after the implementation of the intraday capacity calculation methodology, is too short. We think that at least 12-months shall be considered for TSOs to gain experience and to establish proper "experimentation results".

In fine, as the implementation of the pan-european IDCZGT is dependant upon other methodologies and will not occur right after ACER decision, we would like to stress that some transparency will have to be made towards market players, with respect to the IDCZGOT and IDCZGCT that will be applied from the XBID go-live, as well as the market time units for each borders.

- 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?**

We support this approach, which is in line with the opinion of the majority of NRAs. The CCRs have their specificities (different networks, different sizes, different experiences with market coupling, different levels of congestion, etc.) and cannot reach the European targets with respect to capacity calculation in intraday at the same time. We thus consider pragmatic and appropriate that CCR have different target dates for implementing the harmonised GOT.

**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 would like to recall first that we are in favour of fixing the GCT per bidding zone border, as mentioned in the article 59(3) of the CACM Regulation. We also fully support GCT at one hour before the start of the relevant market time unit on the French borders, as specified in the article 59(4) of CACM regulation, as it is the only way to allow cost effective proactive balancing system operation which implies the use of slower reserves.

In addition, we would like to insist that having a GCT defined ahead of the start of the market time unit implies that on some borders, the GCT could take place more frequently than 1 hour. If 30-minutes products are allocated 1 hour before their delivery, this means that there should be 2 gate-closure per hour. In the same vein, if 15-minutes are allocated one hour ahead of delivery, this implies that there are 4 gate-closures per hour. If the MTU is 15 minutes there should be a GCT at 14h for the MTU 15h-15h15, then a GCT at 14h15 for the MTU 15h15-15h30, then a GCT at 14h30 for the MTU 14h30-15h30. Thus the frequency of the GCT should be aligned with the market time unit. So far, TSOs and NEMO have not provided full clarity on the MTU per border and thus on the frequency of GCT. For the sake of clarity, we invite ACER to set a list with MTU per border.

Finally, definition 39 of CACM Regulation states that “intraday cross-zonal gate closure time means the point in time where cross-zonal capacity allocation is no longer permitted for a given market time unit”. The specifications and the current structure of XBID are not compliant with this definition, as capacity allocation will occur after the gate closure time. While such incompliance has to be weighted with the benefits of a prompt go-live of XBID and seem acceptable for an intermediary phase, CRE would like to bring to ACER’s attention that this should not be the definitive solution implemented. CRE asks ACER to shed light on this topic in its final decision.