



Brussels, 30 January 2018

Enel response to the ACER consultation on intraday cross-zonal gate opening and closure times

Enel would like to thank ACER for the opportunity to provide its views on the TSOs' proposal for intraday cross-zonal gate opening and closure times (ID CZ GOT/GCT).

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?

With the latest proposal, GOTs of Capacity Calculation Regions (CCR) will be set at:

- 15:00 for the Nordic capacity calculation region (CCR)
- 18:00 for the Hansa and Baltic CCRs
- 18:30 for the Ireland-UK CCR
- 22:00 for the Core, Italy North, Greece-Italy, SWE, Channel and SEE CCRs

In our view, this proposal lacks ambition and justification, thus it must be improved. First, it is unclear what are the technical reasons why TSOs in continental Europe decided to have such an extensive time margin between the time when the day-ahead market closes/day-ahead nominations (15:30 at the latest) are confirmed and the proposed ID CZ GOT (22:00). In addition, a GOT of 22:00 is later than the existing one of 21:00 on most continental European borders. It is therefore representing a step back compared to current situation.

Without a detailed explanation from TSOs the interim GOT should be 18:00 D-1, in any case GOT should not be above 21:00 D-1 in order to avoid step back compared to existing cross-border intraday access.

In any case, there must be a clear timeline of maximum 12 months to reach the objective of a harmonised ID CZ GOT at 15:00 D-1.

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?

See answer 1.



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?

See answer 1

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 are in favour of option (a).

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 are in favour of different target date for implementing the harmonised GOT but by 12 months all CCR must be compliant with the goal of 15:00 D-1

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.

If a harmonised GCT of 1 hour is maintained, then the possibility to have exemption (i.e. to have a shorter GCT of 15 minutes) should also apply to other borders and not only to the EE-FI border. The benefits of cross-border intraday trading (close to delivery) are higher in case of structural differences in the generation mix on both sides of the border. This applies for example to borders with large shares of wind or hydro generation on one side of the border and small shares of wind respectively hydro generation on the other side. The need to have shorter CGTs (exemptions) is also higher for countries where TSOs refrain from using Replacement Reserves as otherwise the value of cross-border flexible capacity could be exploited by cross-border procurement of Replace Reserves.