

Paris, January the 30th 2018

Answer to ACER consultation on Intraday Cross-Zonal Gate Opening and Gate Closure Times (IDCZGT)

- a) For capacity calculation region Nordic at 15:00 market time day-ahead.
- b) For capacity calculation region Hansa at 18:00 market time day-ahead
- c) For capacity calculation region Core at 22:00 market time day-ahead.
- d) For capacity calculation region Italy North at 22:00 market time day-ahead.
- e) For capacity calculation region Greece-Italy at 22:00 market time day-ahead.
- f) For capacity calculation region South-west Europe at 22:00 market time day-ahead.
- g) For capacity calculation region Ireland and United Kingdom at 18:30 market time day-ahead.
- h) For capacity calculation region Channel at 22:00 market time day-ahead.
- i) For capacity calculation region Baltic at 18:00 market time day-ahead.
- j) For capacity calculation region South-east Europe at 22:00 market time day-ahead.

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?

Q2: 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?

Q3: 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?

Direct Energie, as an integrated utility, has no particular opinion about technical questions concerning TSOs abilities to optimise their capacity calculation and congestion management processes. Thus, it does not seem very relevant for us to give our view on these subject which are relevant matters to be discussed between NRAs and TSOs.

However, the only opinion we can have is that any change in the ID market that could bring liquidity and efficiency in the ID markets is to be seen as positive. Thus, any realistic optimisation of technical processes concerning CACM is welcomed as long as it brings effectively some upsides effects.

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.

ACER is seeking stakeholders' feedback on the following three implementation options for the harmonised GOT at 15:00 D-1:

- 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.

According to Direct Energie, a realistic and constructive change in IDCZGT comes necessarily with sufficient intraday calculation in each CCR. As long as the TSOs concerned in a CCR are not ready to implement an earlier GOT, there is no interest in having an harmonized (thus earlier GOT).

Direct Energie is thus in favour of option c) (e.g. *The harmonised GOT shall be implemented in a CCR within 6 months after the implementation of intraday capacity calculation in that CCR*)

Even if we obviously do not have the whole view on the 15:00 D-1 GOT, we think a more realistic target (and less dogmatic) would be to have GOT @ 18:00 D-1. The main reason is that 15:00 in D-1 seems too close from DAH market coupling and thus will not bring enough added value for markets participants, as Cross-zonal capacities calculation won't change a lot from DAH calculation.

On top of this, having a GOT @ 18:00 D-1 would also allow more CCRs to converge in an harmonized timeline, with a more reasonable effort for TSOs to optimize their ID capacity calculation and congestion management, while giving the possibilities for market participants to have ID markets opening earlier than 22:00 PM in DAH.

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?

Yes.

Q6: 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 opinion on EE-FI border. Concerning GCTs in general, there is a large consensus among TSOs to have a GCT 60 minutes before real time. On a pure trading point of view, ID coupling is really the main driver of liquidity, thus one could ask for having a GCT shortened to its minimum possible, as the liquidity of ID trading vanishes once market are decoupled. This has to be balanced by TSO constraints to correctly manage their grid the most efficient way (e.g. with minimalized costs).