

Dear Madam, Dear Sir,

TIWAG-Tiroler Wasserkraft AG is an market participant mainly operating on the Austrian and German markets for production, trading, supply and distribution of electricity in all time frames. We welcome the opportunity to comment on the public consultation:

Consultation on the cross-zonal gate opening and gate closure times for intraday coupling, 30 January 2018 (PC_2018_E_01)

Consultation questions:

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?

We would like to stress the importance of an ambitious implementation target date for the EU-wide harmonized latest GOT. A transitional period – if necessary – should be as short as possible.

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?

No activities on this border, but 15:00 D-1 has to be the overall target.

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?

Such an optimization should not be a great problem. But to answer precisely, regional differences have to be taken into account. To support market liquidity and operational planning especially for smaller market participants GOT has to be at 18:00.

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.

We prefer option a) but we would like to state that we understand the harmonized GOT as the latest point of opening. From a market point of view an earlier implementation should be realized.

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?

In general, one single implementation target date for all CCRs has to be fixed. Only in individual cases – where justified – the Agency might grant a derogation.

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.

We do not agree with further exceptions from the harmonized cross-zonal GCTs of 60 minutes before real time. The cross-zonal GCTs for the intraday market and the GCTs for balancing energy have to match in order to maximize the residual capacity available to the internal intraday market to support its liquidity after TSO's calculations. In this context we would like to stress that GCTs of the internal intraday market should be as close to real time as possible (e.g. 5 minutes within Germany in one TSO area, 5 minutes within Austria as of 31.01.2018).

Thank you for taking our comments into consideration. If you have any further questions, please do not hesitate to contact us.

Best regards,