

Dear all,

on behalf of the CEZ Group, I would like to thank you for the opportunity to express our opinion on designation of cross-zonal gate opening and gate closure times for intraday coupling.

We appreciate that both the Agency and NRAs are clearly moving towards harmonized ID gate opening time, which is set as early as possible after the end of day-ahead trading.

In this light, we are of following view:

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?

*We find transitional GOTs reasonable, but at the same time we do not agree with proposed times. Transitional ID GOT should be set at 18:00. Also, a clear deadline for harmonized GOT implementation needs to be set.*

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?

*We believe that 18:00 (not 22:00, as proposed for Channel) could represent a fair transitional GOT.*

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?

*Yes, we believe 22:00 represent a regress from existing practice in some parts of Europe – where GOT is already set at 21:00. Transitional GOT should be moved to at least 18:00 D-1 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 believe harmonized 15:00 D-1 ID CZ GOT should be implemented as soon as possible, therefore we choose option A – “The harmonised GOT shall be implemented within 12 months after the entry into force of the Agency’s decision.”*

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 may accept specific exemptions, but for a limited timeframe (e.g. 6-12 months).*

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.

*Yes, if the exemptions are moved closer to the real time (no moving backwards).*

Do not hesitate to contact me in case of any questions.

Kind regards,