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**Supporting document to the amended all TSOs' proposal  
for intraday gate opening and gate closure times in  
accordance with Article 59 of Commission Regulation (EU)  
2015/1222 of 24 July 2015 establishing a guideline on  
capacity allocation and congestion management**

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10 August 2017

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## 1. Contents

1. Contents.....	2
2. Introductory remarks .....	3
3. Legal background.....	3
4. The All TSOs' proposal .....	5
5. The All NRAs' amendment request .....	5
6. The proposed amendments.....	5
6.1. CCR Nordic .....	6
6.2. CCR Hansa .....	8
6.3. CCR Core.....	9
6.4. CCRs Italy North, Greece-Italy and South-East .....	9
6.5. CCR SWE .....	10
6.6. CCR Ireland and United Kingdom.....	10
6.7. CCR Channel .....	10
6.8. CCR Baltic.....	11
7. Impact of the proposed Intraday Cross Zonal Gate Closure Time .....	12

## 2. Introductory remarks

This document gives background information and rationale for the all TSOs proposal (hereafter referred to as “IDCZGT proposal”) in relation to the intraday cross-zonal gate opening times (hereafter referred to as “IDCZGOT”) and the intraday cross-zonal gate closure times (hereafter referred to as “IDCZGCT”) required by Article 59 (1) of the Commission Regulation (EU) 2015/1222 establishing a guideline on capacity allocation and congestion management (hereafter referred to as “CACM Regulation”).

## 3. Legal background

This part contains the relevant legal references in the CACM Regulation regarding the IDCZGOT and the IDCZGCT.

A number of relevant passages of the preamble of the CACM Regulation are cited, that should be taken into account to properly interpret the articles stated further below.

*“13) Capacity should be allocated in the day-ahead and intraday market time-frames using implicit allocation methods, in particular methods which allocate electricity and capacity together. In the case of single day-ahead coupling, this method should be implicit auction and in the case of single intraday coupling it should be continuous implicit allocation. The method of implicit auction should rely on effective and timely interfaces between TSOs, power exchanges and a series of other parties to ensure capacity is allocated and congestion managed in an efficient manner.*

*(27) The objective of this Regulation, namely the establishment of single day-ahead and intraday coupling, cannot be successfully achieved without a certain set of harmonised rules for capacity calculation, congestion management and trading of electricity.*

*(28) However, single day-ahead and intraday coupling should only be implemented stepwise, as the regulatory framework for electricity trade and the physical structure of the transmission grid are characterised by significant differences between Member States and regions. The introduction of single day-ahead and intraday coupling therefore requires a successive alignment of the existing methodologies on capacity calculation, allocation and congestion management. Single intraday and day-ahead coupling may therefore be introduced at a regional level as an intermediate step where necessary [bold accent added by TSOs].”*

The most important legal references to IDCZGOT and IDCZGCT in the CACM Regulation are cited below.

Article 59 of the CACM Regulation constitutes the legal basis for this proposal and defines several specific requirements that the IDCZGT Proposal should take into account:

*“1. By 16 months after the entry into force of this Regulation, all TSOs shall be responsible for proposing the intraday cross-zonal gate opening and intraday cross-zonal gate closure times. The proposal shall be subject to consultation in accordance with Article 12.*

*2. The intraday cross-zonal gate closure time shall be set in such a way that it:*

- (a) maximises market participants' opportunities for adjusting their balances by trading in the intraday market time-frame as close as possible to real time; and*
- (b) provides TSOs and market participants with sufficient time for their scheduling and balancing processes in relation to network and operational security.*

*3. One intraday cross-zonal gate closure time shall be established for each market time unit for a given bidding zone border. It shall be at most one hour before the start of the relevant market time unit and shall take into account the relevant balancing processes in relation to operational security.*

4. *The intraday energy trading for a given market time unit for a bidding zone border shall start at the latest at the intraday cross-zonal gate opening time of the relevant bidding zone borders and shall be allowed until the intraday cross-zonal gate closure time.*

5. *Before the intraday cross-zonal gate closure time, market participants shall submit to relevant NEMOs all the orders for a given market time unit. All NEMOs shall submit the orders for a given market time unit for single matching immediately after the orders have been received from market participants. [.]*

IDCZGOT and IDCZGCT are defined by Article 2 (38) and Article 2 (39) of the CACM Regulation as follows:

*“38. ‘intraday cross-zonal gate opening time’ means the point in time when cross-zonal capacity between bidding zones is released for a given market time unit and a given bidding zone border;*

*39. ‘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;”*

Another important definition is the intraday market timeframe as stated in Article 2 (37) of the CACM Regulation:

*37. ‘intraday market timeframe’ means the timeframe of the electricity market after intraday cross-zonal gate opening time and before intraday cross-zonal gate closure time, where for each market time unit, products are traded prior to the delivery of the traded products;*

Furthermore, the general objectives of the CACM Regulation are outlined at Article 3:

*“This Regulation aims at:*

- (a) promoting effective competition in the generation, trading and supply of electricity;*
- (b) ensuring optimal use of the transmission infrastructure;*
- (c) ensuring operational security;*
- (d) optimising the calculation and allocation of cross-zonal capacity;*
- (e) ensuring fair and non-discriminatory treatment of TSOs, NEMOs, the Agency, regulatory authorities and market participants;*
- (f) ensuring and enhancing the transparency and reliability of information;*
- (g) contributing to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union;*
- (h) respecting the need for a fair and orderly market and fair and orderly price formation;*
- (i) creating a level playing field for NEMOs;*
- (j) providing non-discriminatory access to cross-zonal capacity.”*

As a general point, all methodologies and proposals developed under the CACM Regulation should align with the objectives of the CACM Regulation. More specifically, Article 9(9) of the CACM Regulation requires that:

*“The proposal for terms and conditions or methodologies shall include a proposed timescale for their implementation and a description of their expected impact on the objectives of this Regulation.”*

Additional relevant references to IDCZGOT and IDCZGCT within the CACM Regulation are:

Article 51 (1):

*“1. From the intraday cross-zonal gate opening time until the intraday cross-zonal gate closure time, the continuous trading matching algorithm shall determine which orders to select for matching such that matching: (...)”*

Article 58 (1):

*“1. Each coordinated capacity calculator shall ensure that cross-zonal capacity and allocation constraints are provided to the relevant NEMOs no later than 15 minutes before the intraday cross-zonal gate opening time. “*

Article 63 (2):

*“2. Complementary regional intraday auctions may be implemented within or between bidding zones in addition to the single intraday coupling solution referred to in Article 51. In order to hold regional intraday auctions, continuous trading within and between the relevant bidding zones may be stopped for a limited period of time before the intraday cross-zonal gate closure time, which shall not exceed the minimum time required to hold the auction and in any case 10 minutes. ”*

Article 63 (4) (d):

*“(d) the timetables for regional auctions shall be consistent with single intraday coupling to enable market participants to trade as close as possible to real-time.”*

## 4. The All TSOs' proposal

In accordance with Article 59 of the CACM Regulation, all TSOs submitted to all NRAs in December 2016 (i.e. 16 months after the entry into force of the Regulation) their proposal on the IDCZGOT and IDCZGCT. The documents were also submitted to ACER and the EC and were published on ENTSO-E's website.

## 5. The All NRAs' amendment request

As per Article 9 of the CACM Regulation, all NRAs had 6 months to decide on the submitted proposal and either approve it or request amendments to it.

In June 2017, all NRAs issued their amendment request to the IDCZGT proposal requesting the following:

- 1. To propose a IDCZGOT per Capacity Calculation Region (hereafter referred to as “CCR”) by setting a IDCZGOT at the earliest possible time in each CCR.*
- 2. To set a future harmonised default IDCZGOT as the earliest IDCZGOT at CCR level as defined in the amended proposal, taking into account scheduling and balancing processes in relation to network and operational security.*
- 3. To duly justify the proposed IDCZGOT per CCR against the proposed future default IDCZGOT in cases where the proposed IDCZGOT in a CCR is later than the future default IDCZGOT.*
- 4. To set, within the proposal, a IDCZGCT per BZB at most one hour before the start of the relevant MTU. The IDCZGCT per BZB should be set taking into account the requirements of article 59(2) and 59(3) of Regulation 2015/1222 and therefore should be set closer than one hour to the start of the relevant MTU where appropriate.*

## 6. The proposed amendments

The TSOs have amended the IDCZGT proposal accordingly. Regarding the provisions on the IDCZGCT, since 60 minutes seems to be the most preferable solution, the amended proposal includes a general

provision on that with some exceptions when relevant and necessary. This section includes the justification behind the changes in the CCRs.

## 6.1. CCR Nordic

The TSOs of the Nordic Capacity Calculation Region (hereafter referred to as “Nordic CCR”) welcome the request of the NRAs to propose IDZCGOT at the earliest possible time in each CCR, market time day ahead which has been also appreciated by the Market Participants at the public consultation (from 18 April to 18 May 2016) on the all TSO IDCZGT proposal. However, it will be not be possible for the Nordic CCR to comply with EU regulation if the current GOT in in the Nordic CCR has to remain at 14:00 market time day ahead also in the future.

In this section the TSOs of the Nordic CCR aim at answering the requested action (1) by NRAs, stated above, regarding an earlier intraday cross-zonal gate opening time for the bidding zone borders constituting the Nordic CCR and thereby indicating the reason for the specified GOT.

### Benefits of an early GOT

The Nordic TSOs prefer an early opening time in CCR Nordic in order not to restrict trading possibilities for intraday (ID) timeframe for market participants. By large, the ID trade already in the afternoon serves a different purpose compared to trade close to the hour of operation. Just after receiving the results from the day-ahead (DA) market, the market participants will know their imbalances, and the Nordic TSOs will know the additional imbalances due to forecasted ramping on HVDC interconnections. The Nordic TSOs expect several years where the DA market will be operated at hourly resolution, before the market time unit will be implemented at 15 minute resolution. Further, many market participants want to trade away their known imbalances at this early stage of the ID market. For the TSO it is preferable if these imbalances are traded away before generation schedules are collected later in the afternoon.

### Current GOT in the Nordic CCR

Intraday capacities are determined by the relevant TSOs after the flow results of the DA auction. The exact timing of capacity allocation varies and depends both, on operational procedures and individual agreements between the TSOs on the different borders. Approximate starting timings for capacity allocation are on bidding zone borders of Nordic CCR around 14:00 market time day ahead<sup>1</sup>. This implies that currently the bidding zones within CCR Nordic have a gate opening time (GOT) of 14:00 market time day ahead.

Currently DA results are normally available at 13:00 market time day ahead and at the latest 13:50 market time day ahead; the remaining capacity from day-ahead timeframe is given to the ID market, unless some major incident has happened in the grid, requiring a TSO to adjust capacity. No capacity calculation is done on the capacities released for ID trade today.

### Transparency Regulation

The TSOs have to comply with the requirements of the Transparency Regulation (Commission Regulation (EU) No 543/2013 on submission and publication of data in electricity markets (provisions on the timing of publication of cross-zonal capacity), which states that:

*“1. For their control areas, TSOs or, if applicable, transmission capacity allocators, shall calculate and provide the following information to the ENTSO for Electricity sufficiently in advance of the allocation process:*

*(a) the forecasted and offered capacity (MW) per direction between bidding zones in case of coordinated net transmission capacity based capacity allocation;*

*(...)*

*2. The information laid down in paragraph 1(a) shall be published as set out in the Annex”*

<sup>1</sup> Nord Pool website: <http://www.nordpoolspot.com/TAS/intraday-trading/capacities/>



The Annex to the Regulation sets the deadline for publication of information, referred to in the above articles, to one hour before the first ID allocation and then real-time, for each market time unit, as stated in below table:

ANNEX

Publication of the information referred to in Article 11(2)

Capacity allocation period	Forecasted cross zonal capacity to be published	Offered capacity to be published
Yearly	One week before the yearly allocation process but no later than 15 December, for all months of the following year	One week before the yearly allocation process but no later than 15 December
Monthly	Two working days before the monthly allocation process for all days of the following month	Two working days before the monthly allocation process
Weekly	Each Friday, for all days of the following week	One day before the weekly allocation process
Day-ahead		One hour before spot market gate closure, for each market time unit
Intra-day		One hour before the first intra-day allocation and then real-time, for each market time unit

Table 1 - Table from regulation 543/2013

Currently Nord Pool Spot submits (as agreed with Nordic TSOs) the data under Article 11.1 of the Transparency Regulation to ENTSO-E transparency platform. Even though the results from DA ordinarily are available at 13:00 market time day ahead, it is common that the leftover capacity based on DA results are published after 13:00 market time day ahead to the ENTSO-E transparency platform.

In the future, it is still the TSOs who have this responsibility through the coordinated capacity calculator (CCC). Some TSOs (CCC) will choose to deliver the data themselves, others will have a contract with a service provider to deliver the data. At that time, the data will not directly be sent from the source (meaning from XBID host). Thus, there will be an additional step via XBID, where the service provider receives the data, which has to be formatted and published on the transparency platform. Given the additional steps, this process will take longer than before, result being that the Nordic TSOs - also through involvement of CCC in provision of capacity to the allocation - are on a tight schedule in order to comply with the regulation in the future.

The offered capacity delivered to the Transparency Platform can only be updated in the case of a major incident for the market time units after the incident. If the Nordic TSOs do not deliver data to the platform one hour before GOT they are not following the transparency regulation, which market participants depend on for their analysis.

It has to be noted that the regulation of the transparency platform should not be associated with the CACM Article 58 (1):

*“Each coordinated capacity calculator shall ensure that cross-zonal capacity and allocation constraints are provided to the relevant NEMOs no later than 15 minutes before the intraday cross-zonal gate opening time.”*

These are two different provisions of data, with different significances to the electricity market. Article 58(1) of CACM Regulation sets requirement to provide information to the relevant NEMOs but Transparency Regulation sets requirement for provision information for ENTSO-E transparency platform.

Provision of cross-zonal capacity to ID market in accordance with CACM Regulation

In accordance with CACM Regulation, CCC shall provide the validated cross-zonal capacities and allocation constraints for the purpose of the ID capacity allocation. Validation of cross-zonal capacity is the

responsibility of each TSO within a CCR after receiving the results of the regional capacity calculation from the CCC. Although reassessment of cross-zonal capacity with updated CGM after DA results is not possible for early gate opening, each TSO has to validate the cross-zonal capacity to be given to the ID market before CCC provides the capacity to the ID allocation. Although the capacities will be based on the remaining cross-zonal capacity from DA market timeframe the responsibility for cross-zonal capacity given to the ID market lies within each TSO for its bidding zone border(s).

In accordance with CACM Regulation, results of DA market timeframe should be available at the latest around 13:50 market time day ahead implying that the remaining cross-zonal capacity from DA allocation shall be available around same time. CCC can first start the validation process at this timeframe leading that cross-zonal capacities may be delivered to ENTSO-E transparency platform at the latest 14:00 market time day ahead. This delivery makes it possible to have ID gate opening at 15:00 market time day ahead.

#### Reason for moving the GOT to 15:00 market time day ahead

The Nordic TSOs believe that cross-zonal ID trading should be opened as soon as possible after the allocated capacities across the bidding zones borders resulting from single DA coupling are known whilst still following the existing Transparency and CACM regulations.

In light of current situation, where it is not uncommon that ID capacity data is unpunctually delivered to the ENTSO-E transparency platform, and taking into account provisions of CACM Regulation related to capacity calculation and also that the TSOs have the responsibility of delivering data to the ENTSO-E transparency platform, the Nordic CCR proposes a GOT of 15:00 market time day ahead.

Essentially, this would not substantially change the current situation where market participants to have enough time to trade, particularly in the first delivery hours of the ID timeframe. The cross border capacity made available at 15:00 market time day ahead for the ID market would be the remaining cross-zonal capacity from the single DA coupling. The GOT in CCR Nordic would still be the earliest in the EU, and setting GOT at 15:00 market time day ahead will be efficient, meet the intention of the amendment request and importantly comply with the CACM and Transparency Regulation.

The remaining capacity from DA shall be offered to the ID market before 14:00 market time day ahead as required by Transparency regulation to have gate opened for first allocation at 15:00 market time day ahead. However, the Nordic TSOs might have some difficulties where the Transparency Regulation is not upheld (late publishing of ID capacities) especially in cases when fallback procedures are initiated in DA timeframe and when capacity calculation methodology in accordance with CACM regulation will be implemented in DA and ID timeframes.

#### Conclusion

It is necessary to move the Nordic GOT from 14:00 to 15:00 in order to respect the requirements from the Transparency and CACM Regulation. The future capacity calculation methodology will necessitate calculation processes that are currently not designed. How much additional time TSOs and the CCC will need for these processes is not known yet, but currently the best estimate is, that it will be possible to do it within a GOT at 15:00 market time day ahead. TSOs in Nordic CCR, therefore, propose 15:00 market time day ahead as a new regional GOT for CCR Nordic.

## **6.2. CCR Hansa**

### Proposals explored and TSO positions

In CCR Hansa 3 different proposals for IDCZGOT have been explored:

- a) a GOT of 15:00 preferred by the Nordic TSOs, based on using left over DA capacity when opening the ID market;



- b) a GOT of 22:00 preferred by the continental TSOs, based on this being the first time a recalculation of ID capacity can realistically take place with the expected new processes with CGM and new capacity calculation methodologies; and
- c) a compromise GOT of 18:00 based on using left over DA capacity to open the ID market, with no guarantee that full leftover DA capacities will be provided to ID market.

It has to be kept in mind that according to the ACER decision 06-2016 on CCRs the bidding zone border between Norway and Netherlands is not included in the CCR Hansa. Thus, the CCR Hansa is composed of four EU Member States and decisions in CCR Hansa have to be taken unanimously.

#### Compromise proposal for IDCZGOT in CCR Hansa

As a compromise the CCR Hansa TSOs agreed to a proposal where the IDCZGOT for CCR Hansa will be 18:00 for all borders. However, in case of changes in the capacity calculation procedures the timing of the IDCZGOT may be amended.

The IDCZGOT of 18:00 is equal to the current latest GOT on a bidding zone border in CCR Hansa which is DK1-DE, thus keeping within the framework set by the All-NRA amendment request.

This compromise enables a CCR Hansa agreement on IDCZGOT for the borders in CCR Hansa.

All other considered alternatives would lead to a non-decision from CCR Hansa, thus the All-TSO amended proposal would not be able to contain information from CCR Hansa.

### **6.3. CCR Core**

Within CCR Core there are various gate opening times for the cross-border intraday markets. However, for defining the future Intraday cross-zonal gate opening time the foreseen coordinated intraday capacity calculation process needs to be taken into account. This process has to be finished before any capacity can be given to the intraday market. The reason for this originates from the strong interdependencies of the power flows in the highly meshed transmission grid in CCR Core. In order to respect these interdependencies and keep the system in a secure state at all times, the Core TSOs perform several coordinated system security process steps that interact with each other. The intraday capacity calculation is one of these steps. To achieve plausible results, it is necessary to work with a common basis (i.e. the common grid model (CGM)). The CGM includes all the scheduled exchanges from the DA market and the planned necessary redispatching measures. Opening up a cross-border ID market before the coordinated intraday capacity calculation has been completed, might lead to changes of the net positions of the bidding zones within CCR Core. This would undermine the European D-1 CGM / grid security process and render the intraday capacity calculation process useless.

According to the agreed processes, the intraday capacity calculation delivers results at 21:00 D-1 using the latest common grid model. In order to avoid discrimination of different cross-zonal gate opening time within one CCR, CCR Core TSOs agreed upon using the original timing proposed for the regional intraday cross-zonal gate opening time of 22:00 D-1 in the Core CCR.

### **6.4. CCRs Italy North, Greece-Italy and South-East**

The TSOs of these CCRs decided to keep the IDCZGOT same as the one in the first all TSOs' proposal. The reason for doing so is that the Intraday Capacity Calculation process is currently foreseen between 18:00 and 21:45<sup>2</sup>. Performing the allocation during the capacity calculation process would increase the level of uncertainty about the generation patterns and TSOs would be more conservative on the capacity calculation.

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<sup>2</sup> In accordance with the processes described in Article 58(1) of the CACM Regulation.

Therefore, during the capacity calculation process the allocation of capacity shall not be opened in order to ensure an efficient calculation. In this way TSOs can limit the uncertainty in the forecast of the net position which is used for capacity calculation.

## 6.5. CCR SWE

The TSOs of this CCR decided in consultation with the NRAs of the SWE region to establish the IDCZGOT at 22:00 D-1 in order to ensure that the continuous intraday trading launches with the updated information of intraday cross-zonal capacity as calculated through the Intraday Capacity Calculation process currently under development in accordance with CACM Regulation. The opening of continuous trading at 22:00 D-1 allows TSOs to perform the capacity calculation process with the best information about the generation patterns leading to a more precise capacity calculation. Additionally, Spanish and Portuguese NRAs are assessing the implementation of Complementary Regional Auctions on the PT-ES border. Should the first of these complementary regional auctions start prior to SWE IDCZGOT, once the technical restrictions resolution procedures and balancing capacity markets are finished, only the PT-ES left over capacities from Day-Ahead Market Coupling will be allocated through this auction allowing Market Participants to perform first adjustments in their positions before the SWE IDCZGOT. For a matter of clarification, the continuous intraday trading will be launched on both SWE borders from 22:00 D-1.

## 6.6. CCR Ireland and United Kingdom

The TSOs of the Ireland-UK Capacity Calculation Region acknowledge and welcome the request from the NRAs and market participants to have an Intraday Cross Zonal Gate Opening Time (IDCZGOT) as early as possible. The TSOs of the IU CCR are in favour of opening the intraday cross-zonal gate shortly after the allocated capacities across the bidding zone borders resulting from single DA coupling are known and are proposing a Gate Opening Time of 18.30 with allocation using regional implicit intraday auctions.

The proposal also takes on board the requirement under the Transparency Regulation to publish capacities, one hour before the first ID allocation and then real-time, for each market time unit (i.e. at 17.30 in the case of the IU CCR).

## 6.7. CCR Channel

In CCR Channel three broad options have been explored:

1. a GOT as early as 15:00 which assumes using left over capacities from DA market;
2. a GOT of earlier than 22:00 which foresees ID capacity calculation by RSC;
3. a GOT of 22:00 which foresees ID capacity calculation by RSC.

Within CCR Channel there are various gate opening times for the cross-border intraday markets. However, for defining the future intraday cross-zonal gate opening time the foreseen coordinated intraday capacity calculation and intraday capacity pricing processes needs to be taken into account. These processes have to be finished before any capacity can be given to the intraday market. The reason for this originates from the strong interdependencies of the power flows in the highly meshed transmission grid in CCR Core. In order to respect these interdependencies and keep the system in a secure state at all times, the Core TSOs perform several coordinated system security process steps that interact with each other. The intraday capacity calculation is one of these steps. To achieve plausible results, it is necessary to work with a common basis (i.e. the common grid model (CGM)). The CGM includes all the scheduled exchanges from the DA market and the planned necessary redispatching measures. Opening up a cross-border ID market before the coordinated intraday capacity calculation has been completed, might lead to changes of the net positions of

the bidding zones within CCR Core. This would undermine the European D-1 CGM / grid security process and render the intraday capacity calculation process useless.

Furthermore pan-EU pricing of ID capacity would only occur at 22h; hence opening sooner on the basis of DA capacity would mean that:

If we open with a regional auction (capacity must be priced before being released for continuous intraday trading)

We are pricing capacity of which we don't know whether it will be available (no ID calculation yet).

In such case the capacity price would not correctly reflect the capacity scarcity, as the ID capacity calculation has not yet taken place.

## 6.8. CCR Baltic

In CCR Baltic two proposals of IDCZGOT have been explored:

1. a GOT of 15:00 which assumes using left over capacities from DA market and is proposed by SvK, Fingrid and Elering;
2. a GOT of 18:00 which foresees ID capacity calculation by RSC, and is proposed by AST, Litgrid and PSE.

Proposal for IDCZGOT in CCR Baltic foresees market opening at 18:00, as, taking into account parallel operation of power grid of CCR Baltic with Russian and Belarus power grids, power flow re-assessment is needed in order to ensure security of power system operation. Processes required for capacity calculation by RSC, asks for more time for the whole capacity assessment process comparing to currently performed calculations by TSOs in the Baltic CCR. Therefore Baltic CCR decided to choose such GOT, which will not reduce and jeopardise power system security comparing to currently applied practice.

There are 4 major arguments for setting GOT in CCR Baltic at 18:00CET:

1. Time needed for RSC processes is longer than time needed for current TSO processes. The approximate calculations of timing for justification of the proposed GOT 18:00 (CET) are below, all timing in CET:
  - a) 13:00 DA market results are available
  - b) 13:00 - 14:00 Russian market results are available
  - c) Until 15:00 BRP (balance responsible party) submit plans for next day
  - d) 15:00 - 15:30 TSO make 24 IGMs
  - e) 15:30 - 16:00 RSC "merging" 24 CGM
  - f) 16:00 - 16:30 RSC calculates Security Analysis and Coordinated Capacity Calculation for ID market
  - g) 16:30 - 17:00 TSO validates results and sends ATC for ID market.
2. BRELL (Belarus, Russia, Estonia, Latvia, Lithuania synchronously operating power systems) processes and information exchange requirements require more time for capacity calculation performed by RSC.
3. Balance responsible parties (which input data are needed for RSC processes) need time to prepare needed data for RSC.
4. Compliance with Transparency Regulation (Commission Regulation (EU) No 543/2013 on submission and publication of data in electricity markets (provisions on the timing of publication of cross-

zonal capacity) asks for moving GOT to a later time, as intraday capacities shall be published at least one hour before the first intra-day allocation.

## 7. Impact of the proposed Intraday Cross-Zonal Gate Closure Time

The proposed IDCZGCT at 60 minutes before the start of the relevant intraday market time unit ensures compliance with both the requirement from Article 59.3 of CACM GL “It shall be at most one hour before the start of the relevant market time unit and shall take into account the relevant balancing processes in relation to operational security.” and the requirement from Article 19.5 of EB GL “(...) all TSOs performing the reserve replacement process pursuant to Part IV of Commission Regulation (EU) 2017/000 [SO] and that have at least one interconnected neighbouring TSO performing the replacement reserves process shall implement and make operational the European platform for the exchange of balancing energy from replacement reserves (...)”. Hence the definition of IDCZGCT at 60 minutes before real time is required for complying with EB GL obligation for systems using Replacement Reserve products to implement and make operational the European Platform of exchange of RR.

Concerning impact of proposed IDCZGCT, TSOs extending the intraday trading period till 60 minutes before delivery time may lead to additional requirements towards other processes existing and/or being set up. One such example is TSC IDCF process, which is basis for activation of remedial actions such as changing taps of PSTs and cross-border re-dispatching. Currently due to time necessary to perform this process including: creation of IGMs, merger of IGMs into CGMs, contingency analysis, activation of remedial actions, the CGMs used in decision on activation of remedial actions cannot include trades concluded within 3 hours before delivery. In the end with current processes that creates additional requirement that capacity allocation shall not create an additional need for remedial actions within 3 hours before the delivery.