CONSULTATION RESPONSE

Response to SEM TSOs derogation request on the switch to 30-minute Intraday Cross-Zonal Gate Closure Time

Brussels, 11 November 2026

Key messages

- We support the switch from 1 hour to 30 minutes for the intraday cross-zonal gate closure time (IDCZGCT) before real-time. It furthers trading liquidity, efficiently utilises resources between bidding zones, better balances surpluses and shortages caused by changing weather conditions and fosters the integration of renewable assets in a cost-effective manner. Therefore, it is crucial to maximise trading opportunities via access to a liquid market as close as possible to the time of delivery of the electricity.

- During the Electricity Market Design reform, we also advocated that this can be set even closer in the future to match other measures bringing operations and market functioning closer to real-time (Imbalance Settlement Period 15 minutes and Day-Ahead 15 minutes Market Time Unit).

- We understand that RTE already has a derogation approved, which has an impact on operational implementation on the French-Single Energy Market (SEM) border. We recognise some of the reasoning set out in Eirgrid and SONI's draft impact assessment report and encourage that the Irish TSOs achieve the switch in alignment with developments by RTE and implement at the earliest possible.

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Detailed comments

1. *Do you agree that applying a 30-minute IDCZGCT on the SEM–France border at Celtic go-live could create operational and security-of-supply risks? Please comment on reaction times, schedule firmness, ramping, reserves and system stability.*

We recognise the reasons outlined by the Irish SEM TSOs in the consultation document, notably for an implementation at the go-live of the Celtic Interconnector. It makes sense, with the French derogation approved, that the French-SEM border operational switch would be dependent on the advances made by the French TSO RTE. EirGrid and SONI also raise points about other market and system projects that are ongoing for the integration of SEM into the EU IEM. An ask for gaining operational experience with the required changes linked to the EU IEM makes sense. We also recommend that the SEM TSOs continue exchanging with Continental European TSOs on experiences and best practices. For example, Italy is another European country using a central dispatch system, and it has implemented the 30-minute intraday cross-zonal gate closure time switch in 2026.

We understand the request for a derogation, and strongly encourage EirGrid and SONI to align where possible with RTE on advances in their respective action plans for readiness in January 2029. We also highlight that if implementation can be achieved before the derogation deadline, it should be pursued.

2. *What impact would a 30-minute IDCZGCT have on participant readiness for SIDC continuous trading on the SEM–France border? Please identify required changes, testing, lead times or dependencies for systems, trading and operational arrangements.*

As an organisation representing energy traders across Europe, our membership has experience across several markets. We recognise the need to adapt systems and processes ahead of the SIDC continuous trading go-live. Bilateral exchanges about experiences, while respecting confidentiality, could be set up.

3. *Would temporarily retaining a 60-minute IDCZGCT until 1 January 2029 materially affect efficient SIDC continuous trading? Please comment on trading opportunities, forecast accuracy, liquidity, imbalance management and route-to-market arrangements.*

On the one hand, while not ideal to have a fragmented implementation of the 30-minute IDCZGCT, it is permitted and has been the experience at several European borders with different derogation requests and timelines.

We note that the temporary nature of the different timings may have a non-level playing field effect in coupled markets, where some market participants in certain countries will have additional trading opportunities available to them, where they can adjust their positions, better balance themselves and help the system.

Not having the same rules and gate closure times may be reflected in hedging, notably for cross-border trading.

4. *Do you agree that immediate implementation of a 30-minute IDCZGCT could create cost-efficiency risks? Please comment on balancing actions, redispatch, countertrading, reserve procurement, system changes or operational interventions.*

We recognise the SEM TSOs' concerns about an immediate implementation. Gaining experience, interactions with ongoing projects and operational readiness should be taken into account. We encourage a good implementation as soon as feasibly possible, to avoid further delays and fragmented implementation.

On the imbalances and balancing cost concerns, we offer this perspective, taking into account that SEM is currently looking to implement the IEM regulations for the Celtic interconnector go-live. The Imbalance Settlement Period has already shifted to 15 minutes for BRPs, and experience can be shared from continental market participants. From an operational point of view, a shorter gate closure time can have positive effects. If market parties succeed in leveraging the gate closure time closer to real time to reduce imbalance, fewer balancing actions might be required to be activated, resulting in more cost-effective system operations.

5. *What impact would either a 30-minute IDCZGCT or a temporary 60-minute IDCZGCT have on RES and GHG emissions in the SEM? Please consider forecasting, dispatch-down, imbalance exposure, balancing actions, and reliance on short-notice flexibility.*

Ultimately, we support the switch to 30 minutes for the IDCZGCT and the benefits it would bring for RES integration. While RES production may be more variable and weather-dependent, they also have a role and contribution to balancing services and helping the system. BESS technologies can also help with faster response needs; we notice that they

currently are dispatched in accordance with their Physical Notifications schedules under existing rules. Ways to explore how these assets can help mitigate the concerns raised should be explored by the TSOs in the upcoming action plan, under possible regulatory changes.

6. *Are there specific market, operational, IT, settlement, or participant-readiness milestones that EirGrid and SONI should include in the action plan for implementing the 30-minute IDCZGCT by 1 January 2029?*

We recommend the exchange of best practices between TSOs in terms of actions, planned changes to operations and IT systems. Experience from TSOs that have implemented the switch and from other derogating TSOs can help EirGrid and SONI with their own readiness and experience. Concerns raised about continuous intraday trading experience can also be, and may already be, part of these TSO exchanges.

We observed that one of the security reasons behind the derogation request is the need for short-notice flexible capacity, often thermal generation technology, and that BESS technologies are currently limited by existing regulations. Therefore, within the Action Plan considerations, we would recommend looking into the regulatory changes that may be needed to ensure additional flexible asset availability for faster response needs.

There are also concerns about unexpected and short-notice interconnector flow changes. We underline that an interconnector also provides an opportunity to exchange and provide support in case of system needs. Interconnectors can also contribute to security of supply.

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