

Intraday cross-zonal gate closure time (IDCZGOCT) Methodology

Brussels, 23 May 2025

General comments

We fully support the amendment of the cross-zonal intraday gate closure from 60 to 30 minutes before real-time. It allows market participants to better balance surpluses/shortages that are for example caused by changing weather conditions and it enables energy system integration in a cost-effective manner.

Therefore, we ask TSOs for early implementation of this important rule. They should demonstrate in detailed impact assessments all the reasons for possible postponements and avoid as much as possible implementation until 2029 or even 2031.

While the amendment is a progress compared to the current cross-zonal intraday gate closure time set at one hour before real time, we believe this can be set even closer in the future.

The imbalance settlement period in all EU Member States is now set at 15 minutes before real time and corresponding 15-minute intraday products are in place across nearly all of Europe.

Therefore, we ask for coordination between TSOs and NEMOs on this important project for market participants and to report in every Market Coupling Consultative Group on possible derogations.

Detailed comments

Regarding whereas (5), we disagree with the statement that Regulation (EU) 2024/1747 "acknowledges" the fact that the reducing of the IDCZGCT would have a negative impact on operational security, when providing for the possibility to request a derogation.

We rather understand that derogations are only granted if it is proved through an impact assessment that the change in the IDCZGCT would have a negative impact on operational security. Therefore, we request the preamble be revised to state that derogations are allowed if a negative impact on operational security is proven through an impact assessment.

In Art.5§2, there should be a clear distinction between the two derogations processes related to art.8(1a) and art.8(1b) of Regulation (EU) 2024/1747 as it is done in preamble (3). Indeed, the two

CONSULTATION RESPONSE



refer to different derogation periods, the first one involving only NRAs and the second one involving ACER.

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