

Response to the derogation request for intraday cross-zonal gate closure time switch to 30 minutes in France

Brussels, 04 June 2025

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 maximize 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 caution against too many derogations further delaying the implementation of EU Regulation and invite TSOs, including RTE, to implement at the earliest possible.

Detailed comments

Overall document feedback

We recognise RTE's reasons for delaying the implementation of IDCZCGT 30 minutes, nonetheless, we encourage a good implementation as soon as possible and as quickly as possible.

Should there be a derogation granted, transparency in RTE's data publication needs to increase by the new date at the latest, for example, on bids activated and sectoral demand consumption by usage.

CONSULTATION RESPONSE



We caution against introducing new specific products or cost allocation changes during the derogation that do not align with the upcoming switch.

Cross-border coordination

We urge that the process be well coordinated with neighbouring TSOs and NEMOs for a harmonised implementation. We encourage TSOs and NEMOs to align themselves when considering derogation requests to facilitate and accelerate the benefits of a 30-minute gate closure time. In a situation where different TSOs would be ready as of, for example, March 2027, the benefits can be considered as being higher compared to a situation where one or more borders would stay longer with an ID CZ GCT at T-60' because of the non-readiness/requested derogation of the neighbouring TSO. To our knowledge, that would probably be the case for the BE-FR border because of the FR border (derogation for January 2029 compared to March 2027 for Belgium). While other borders would be ready to go live at the same time as the derogation request proposed by Elia.

Balancing Responsible Parties

On RTE's analysis about Balancing Responsible Parties not benefiting fully from the switch, we offer this perspective. The Imbalance Settlement Period has already shifted to 15 minutes for BRPs. 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 by RTE, resulting in more cost-effective system operations.

Contact

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