

## REN consultation on Intraday cross-zonal gate closure time (IDCZGCT) derogation

*Brussels, 06 June 2025*

### **1. We fully support the amendment of the cross-zonal intraday gate closure from 60 to 30 minutes before real-time**

Switching to 30 minutes supports energy system integration in a cost-effective way by providing:

- a. Efficient use of resources between bidding zones
- b. Better balance surpluses/shortages that are, for example, caused by changing weather conditions
- c. Integration of renewable assets

### **2. We ask TSOs for early implementation of this rule**

TSOs should demonstrate in detailed impact assessments all the reasons for possible postponements and avoid delayed implementation until 2029 or even 2031. It is important that the time toward implementation is used to ensure that all markets operate correctly at technical and operational levels.

### **3. IDCZGCT closer to real time should be pursued**

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.

While the amendment is a step forward 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.

Finally, we need a clear timeline for the 96 allocation gates in Intraday Continuous Trading with enough time for market participants before its implementation.

### **4. Coordinate with neighboring TSOs and NEMOs for a harmonized implementation**

To support a level playing field in MIBEL and uphold the integrity of the Iberian market, we encourage consistent application of rules in both Portugal and Spain, avoiding uncoordinated

# CONSULTATION RESPONSE



derogations that could lead to competitive imbalances between Portuguese and Spanish market participants.

In this sense, and given the importance of harmonising intraday market closing times to promote efficiency and market integration, any derogation should only cover the period necessary for TSOs to adjust their systems, which should be done within a maximum period of 12 months.

Therefore, we ask for coordination between TSOs and NEMOs and to report in every Market Coupling Consultative Group on the status of possible derogations.

## **5. Avoid shift to new IDCZGCT on the first day of the year**

For the sake of security of supply and safe operations, we recommend that Jan 1<sup>st</sup> or bank holidays for go-live should be avoided.

## **6. Avoid introducing new specific products during the derogation**

We recommend that no new balancing-specific products be introduced at national level during the derogation time.

## **Contact**

Federico Barbieri

*Coordinator for Southern European markets*

[f.barbieri@energytraderseurope.org](mailto:f.barbieri@energytraderseurope.org)