

## REE consultation on 30 minutes intraday cross-zonal gate closure time derogation

*Brussels, 22 July 2025*

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

Switching to 30 minutes will result in more cost-effective operations by providing: i) Efficient use of resources between bidding zones; ii) Fewer balancing actions might be required to be activated; iii) Better balance surpluses/shortages that are, for example, caused by changing weather conditions; iv) Integration of renewable assets. This is a compulsory part of the Target Model reflected in the Regulation (EU) 2019/943 and should not be seen as a national voluntary feature.

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

TSOs should implement 30 mins IDCZGCT as quickly as possible and should not wait until the end of 2028 to begin with the implementation. In case of postponement, TSOs should demonstrate in detailed impact assessments all the underlying reasons and any derogations should be strictly time-limited to what is needed for system adjustments. It is important that the time toward implementation is used to ensure that all markets operate correctly at both technical and operational levels.

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

To ensure a level playing field and maintain market integrity in MIBEL, it is essential to apply rules consistently across Spain and Portugal, avoiding unilateral derogations. Neighbouring TSOs and NEMOs should coordinate closely when considering derogation requests, aiming for harmonised implementation of the 30-minute gate closure time.

In fact, early readiness by multiple TSOs would maximise benefits compared to a scenario where one or more borders still have gate closure time of 60 minutes. Finally, regular updates on derogation status should be provided to the Market Coupling Consultative Group.

### **4. 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 electricity. While the amendment is a step forward compared to the current situation, a cross-zonal intraday gate closure time closer to real time could be assessed 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.

## **5. Update the implementation timeline**

We also acknowledge that security of supply is a must and it can be ensured via a detailed action plan included in the request for derogation. Therefore, more clarity should be provided regarding the implementation of the following milestones:

- a) 96 allocation gates in Intraday Continuous Trading, as well as sufficient time given to market participants to acquire experience after its implementation
- b) Capacity product for standard mFRR
- c) Direct nomination
- d) Decoupling operational processes of OMIE regarding Spain and Portugal
- e) Coordination projects between Portugal and France
- f) Specific arrangements, in the eventuality there are different paces of implementation of 30 mins IDCZGCT in Spain, Portugal and France

## **6. We support the direct nomination after the XBID GCT**

The possibility for participants to nominate the transactions carried out in the continuous intraday market with a maximum deadline of 5 minutes after the XBID GCT is a positive step forward. This progress would align Spain with Portugal which has already implemented this provision. Furthermore, we request this feature to be extended to day-ahead.

## **7. Avoid introducing new specific products during the derogation period**

We agree with REE on the fact that new balancing-specific products should not be introduced at national level during the derogation time as they would negatively affect the liquidity and the functioning of European markets.

## **8. 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.

## **Contact**

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