

CNMC consultation on 30 minutes Intraday Crosszonal Gate Closure Time (IDCZGCT) derogation

Brussels, 05 December 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 e.g. 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 with a collaborative action plan

TSOs should implement 30 mins IDCZGCT as quickly as possible and should not wait until the end of 2028 to begin with the implementation. We welcome the CNMC mandate to REE and OMIE to conduct an action plan. We request early involvement of market participants in the scoping phase. It is important that the time toward implementation is used to ensure that all markets operate correctly at both technical and operational levels. In particular, the action plan should foresee 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) Direct nomination. The possibility for market 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. Additionally, we request this feature to be extended to day-ahead.
- c) Decoupling operational processes of OMIE regarding Spain and Portugal
- d) Coordination projects between Portugal and France
- e) Specific arrangements, in the eventuality there are different paces of implementation of 30 mins IDCZGCT in Spain, Portugal and France
- f) Capacity product for standard *mFRR*

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. 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.

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 1st or bank holidays for go-live should be avoided.

Contact

Federico Barbieri

Policy Coordinator – Electricity & Carbon markets

f.barbieri@energytraderseurope.org