

ACER Agency for the Cooperation of Energy
Regulators
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1000 Ljubljana
Slovenia



Bregenz, 25. Januar 2018

Public Consultation on Intraday Cross-Zonal Gate Opening and Gate Closure Times

Dear Sir or madam,

we welcome the opportunity to express our point of view regarding the establishment of harmonized GOT and GCT on the cross zonal Intraday markets and would like to add the following remarks (Bolt):

Consultation questions:

1. Do you find it reasonable to apply transitional GOTs which can be after 15:00 D-1 in order to give TSOs sufficient time to gain operational experience with congestion management procedures and intraday capacity calculation?

Yes. However, in our opinion it is important to set an ambitious implementation date target for the EU-wide harmonized latest GOT that the transitional period is as short as possible.

2. Do you consider the proposed GOT in the Baltic, Channel and Hansa CCRs ambitious enough or could TSOs on both sides of the bidding zone borders in those CCRs implement internal GOTs at 15:00 D-1?

No opinion

3. Do you consider that TSOs could further optimise their planned capacity calculation and congestion management processes to enable a transitional GOT in some CCRs to be set to 21:00 or even earlier?

We would expect that such an optimization shouldn't be a great problem. But to answer precisely regional differences have to be taken into account.

4. Which option for the harmonisation of GOT do you prefer? Please, explain thoroughly why or, alternatively, propose a new concrete timing and add the reasoning for such a choice

We prefer option a) but would like to state that we understand the harmonized GOT as a latest point of opening.

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5. Do you consider it acceptable that each CCR can have a different target date for implementing the harmonised GOT, depending on specific circumstances in such CCR?

In general, one target date make sense to us and only in individual cases exceptions could be granted (by the Agency) where justifiable.

6. Do you agree with the exception from the harmonised GCTs and do you see other bidding zone borders than the EE-FI border where this exception could apply? If so, please explain why.

We agree with the exception. In our opinion the 60 minutes GCT target is not ambitious enough to increase the efficiency of the intraday markets. Shorter GCT to real time would be desirable.

Best regards

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