European Network of Transmission System Operators for Electricity

entsoe

Intraday cross-zonal gate opening and gate closure times (IDCZGOCT)

All TSOs' proposal for amendment of intraday cross-zonal gate opening and gate closure times in accordance with Article 59 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management

[For consultation]

24/04/2025

DISCLAIMER

This document is released on behalf of the all transmission system operators ("TSOs") only for the purposes of the public consultation on the proposal for Intraday cross-zonal gate opening and gate closure times in accordance with Article Article 59 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management ("CACM"). This version of the the Intraday cross-zonal gate opening and gate closure times Proposal does not, in any case, represent a firm, binding or definitive TSOs' position on the content.

Contents

All TSOs, taking into account the following:

Whereas

(1) This document ~~ese terms and conditions are based~~provides an amendment to the Methodology on ~~a common proposal developed by all Transmission System Operators ('TSOs') regarding~~ the intraday cross-zonal gate opening time ('IDCZGOT') and the intraday cross-zonal gate closure time ('IDCZGCT') ~~for the single intraday coupling ('SIDC'~~in accordance with Article 59 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management ('CACM Regulation') following the ACER decision No 04-2018 of 24 April 2018~~)~~.

(2) The amended Methodology on intraday cross-zonal gate opening and gate closure times (IDCZGOC~~O~~T) ~~se terms and conditions for the intraday cross-zonal gate opening and closure times ('Terms and conditions for IDCZGTs')~~ takes into account the general principles and goals set in Article 59 of the ~~Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management ('~~CACM Regulation~~')~~, as well as Regulation ~~(EC)~~ (EU) 2019/943 of the ~~No 714/2009~~ of the European Parliament and of the Council of 5 June 2019~~13 July 2009 on~~ on the internal market for electricity ~~conditions for access to the network for cross-border exchanges in electricity~~ ('Regulation ~~(EC) No 943~~714/20~~10~~9'), as amended by the Regulation (EU) 2024/1747 of the European Parliament and of the Council of 13 June 2024 amending Regulations (EU) 2019/942 and (EU) 2019/943 as regards improving the Union's electricity market design ('EMD Regulation').

~~(3) The goal of the CACM Regulation is the coordination and harmonisation of capacity calculation and allocation in the day-ahead and intraday cross-border markets. To facilitate these aims, it is necessary to set intraday cross-zonal gate opening and gate closure times.~~

~~(4) Article 59 of the CACM Regulation constitutes the legal basis for setting the IDCZGOT and IDCZGCT and defines several specific requirements:~~

~~*1. By 16 months after the entry into force of this Regulation, all TSOs shall be responsible for proposing the intraday cross-zonal gate opening and intraday cross- zonal gate closure times. The proposal shall be subject to consultation in accordance with Article 12.*~~

~~*2. The intraday cross-zonal gate closure time shall be set in such a way that it:*~~

~~*(a) maximises market participants' opportunities for adjusting their balances by trading in the intraday market time frame as close as possible to real time; and*~~

(b) provides TSOs and market participants with sufficient time for their scheduling and balancing processes in relation to network and operational security.

3. One intraday cross-zonal gate closure time shall be established for each market time unit for a given bidding zone border. It shall be at most one hour before the start of the relevant market time unit and shall take into account the relevant balancing processes in relation to operational security.

4. The intraday energy trading for a given market time unit for a bidding zone border shall start at the latest at the intraday cross-zonal gate opening time of the relevant bidding zone borders and shall be allowed until the intraday cross-zonal gate closure time.

5. Before the intraday cross-zonal gate closure time, market participants shall submit to relevant NEMOs all the orders for a given market time unit. All NEMOs shall submit the orders for a given market time unit for single matching immediately after the orders have been received from market participants.

(5) Article 2(37) of the CACM Regulation defines the intraday market timeframe as *'the timeframe of the electricity market after intraday cross-zonal gate opening time and before intraday cross-zonal gate closure time, where for each market time unit, products are traded prior to the delivery of the traded products'.*

(6) Article 2(38) of the CACM Regulation defines the intraday cross-zonal gate opening time as *'the point in time when cross-zonal capacity between bidding zones is released for a given market time unit and a given bidding zone border'.*

(7) Article 2(39) of the CACM Regulation defines the intraday cross-zonal gate closure time as *'the point in time where cross-zonal capacity allocation is no longer permitted for a given market time unit'.*

(8) Commission Regulation (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council ('Regulation 543/2013 ') provides definitions of the following relevant terms:

a. Capacity allocation is defined under Article 2(4) as *the attribution of cross zonal capacity;*
b. Cross-zonal capacity is defined under Article 2(10) as *the capability of the interconnected system to accommodate energy transfer between bidding zones;*

c. Bidding zone is defined under Article 2(3) as *the largest geographical area within which market participants are able to exchange energy without capacity allocation.*

(9) As the IDCZGCT is defined in relation to the market time unit applicable on a bidding zone border, such market time unit needs to be clearly defined. Article 2(19) of Regulation (EU) No 543/2013 provides a general definition of market time unit as *'the period for which the market price is established or the shortest possible common time period for the two bidding zones, if their market time units are different'*. In the case of the market time unit on a bidding zone border in the intraday timeframe, this definition implies a comparison of two applicable market time units within the bidding zones on either side of the border and the definition of the market time unit on the border between them as the longer of the two, since such unit is considered as the 'shortest possible' unit of this border. The market time unit within a bidding zone is understood to be equal to the imbalance settlement period as defined in Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing ('Electricity Balancing Regulation').

(10) Additional relevant references to IDCZGOT and IDCZGCT within the CACM Regulation are listed below:

a. Article 51(1):

'From the intraday cross-zonal gate opening time until the intraday cross-zonal gate closure time, the continuous trading matching algorithm shall determine which orders to select for matching such that matching: (...)'

b. Article 58(1):

'Each coordinated capacity calculator shall ensure that cross-zonal capacity and allocation constraints are provided to the relevant NEMOs no later than 15 minutes before the intraday cross-zonal gate opening time.'

c. Article 63(2):

'Complementary regional intraday auctions may be implemented within or between bidding zones in addition to the single intraday coupling solution referred to in Article 51. In order to hold regional intraday auctions, continuous trading within and between the relevant bidding zones may be stopped for a limited period of time before the intraday cross-zonal gate closure time, which shall not exceed the minimum time required to hold the auction and in any case 10 minutes.'

d. Article 63(4)(d):

'the timetables for regional auctions shall be consistent with single intraday coupling to enable market participants to trade as close as possible to real-time'

(3) In particular, this amendment aims to reflect the legal requirement of the following provisions of the ~~amended~~Regulation 943/2019 as amended by the EMD Regulation:

~~i.~~ Article 8 provides that "[f]*rom 1 January 2026, the intraday cross-zonal gate closure time shall not be more than 30 minutes ahead of real time*";

i.

~~ii.~~

ii. Article 8(1a) provides that "[t]*he regulatory authority concerned may, at the request of the transmission system operator concerned, grant a derogation from the requirement laid down in paragraph 1 until 1 January 2029. The transmission system operator shall submit the request to the regulatory authority concerned. That request shall include:*

(a) an impact assessment, taking into account feedback from NEMOs and market participants concerned, demonstrating the negative impact of such a measure on the security of supply in the national electricity system, cost-efficiency, including in relation to existing balancing platforms in accordance with Regulation (EU) 2017/2195, on the integration of renewable energy and on greenhouse gas emissions; and

(b) an action plan aiming to shorten the intraday cross-zonal gate closure time to 30 minutes ahead of real time by 1 January 2029".

~~iii.~~

iii. Article 8(1b) provides that "[t]*he regulatory authority may, at the request of the transmission system operator concerned, grant a further derogation from the requirement laid down in paragraph 1 by up to two-and-a-half years from the date of expiry of the period referred to in paragraph 1a. The transmission system operator concerned shall submit the request to the regulatory authority concerned, to the ENTSO for Electricity and to ACER by 30 June 2028. That request shall include:*

(a) a new impact assessment, taking into account feedback from market participants and NEMOs, justifying the need for a further derogation, based on risks to the security of supply in the national electricity system, cost-efficiency, the integration of renewable energy, and greenhouse gas emissions; and

(b) a revised action plan to shorten the intraday cross-zonal gate closure time to 30 minutes ahead of real time by the date for which extension is requested and no later than the date requested for the derogation.

ACER shall issue an opinion about the cross-border impact of a further

derogation within six months of receipt of a request for such a derogation. The regulatory authority concerned shall take that opinion into account before deciding upon a request for further derogation".

~~(13) The expected impact of the Terms and conditions for IDCZGTs, as proposed by the TSOs and established, with amendments, in the present document, on the objectives of the CACM Regulation has been assessed and is described in paragraphs (132) to (165).~~

~~(14)~~(4) The~~e Terms and conditions~~ amended Methodology for IDCZGTs facilitates effective competition in the generation, trading and supply of electricity (Article 3(a) of the CACM Regulation) as they establish a harmonised IDCZGOT just after the end of the day-ahead timeframe and the IDCZGCT ~~60~~ 30 minutes before real-time. This provides ample time for market participants to trade across bidding-zone borders in the Union.

~~(15)~~(5) ~~The Terms and conditions for IDCZGTs take into account operational security (Article 3(c) of the CACM Regulation) by setting the IDCZGCT at 60 minutes before the start of the relevant market time unit, which ensures that there is sufficient time for the market scheduling and balancing processes to ensure operational security, taking into account foreseen evolutions in congestion management processes, in the entire intraday coupled region. This enables TSOs to optimise the calculation and allocation of cross-zonal capacity (Article 3(d) of the CACM Regulation) and thereby optimally to use the transmission infrastructure (Article 3(b) of the CACM Regulation).The terms and conditions for IDCZGT have been adapted as required by Article 8(1) of the amended Regulation 943/2019.~~However, ~~T~~the amended ~~Terms and conditions~~Methodology for IDCZGCT may have a negative impact on operational security, as acknowledged in the referred Article 8(~~.~~1(a) of Regulation (EU) 943/2019 as amended by the EMD Regulation when providing for the possibility to request a derogation, as it significantly reduces the time available for TSOs for system operation.

~~(16)~~(6) The harmonisation of IDCZGTs ensures fair and non-discriminatory treatment of TSOs, NEMOs and market participants active on cross-zonal intraday markets (Article 3(e) of the CACM Regulation) and ensures the level playing field between all NEMOs (Article 3(i) of the CACM Regulation). Moreover, a harmonised IDCZGOT allows for fair and orderly organisation of the intraday market (Article 3(h) of the CACM Regulation). This additionally guarantees non-discriminatory access to cross-zonal capacity in the intraday timeframe (Article 3G) of the CACM Regulation) as all market participants in the Union will have access to available cross-zonal capacities within the same time period.

(7) Setting and publishing the IDCZGOTs and the IDCZGTs ensures and

enhances the transparency and reliability of information and contributes to the efficient long-term operation and development of the electricity transmission system and electricity sector in the Union (Article 3(f) and (g) of the CACM Regulation) as all the market parties can rely on these IDCZGTs, which mitigates the regulatory uncertainty and decreases the risk level within the sector.

~~(17)~~(8) For the purposes of this first amendment to the Methodology on the IDCZGOT and the IDCZGCT, the terms used shall have the meaning given to them in Article 2 of the Regulation (EU) 943/2019 as amended by the EMD Regulation, Article 2 of the CACM Regulation and the definitions set out in Article 2 of Annex I of the ACER Decision No 04-2018 of 24 April 2018.

~~(18) The Terms and conditions for IDCZGTs define a harmonised IDCZGOT, as the starting time of the SIDC operation and the time when TSOs start releasing cross- zonal capacity. However, the Terms and conditions for IDCZGTs do not define how much cross-zonal capacity TSOs are able to offer at the IDCZGOT in order to comply with operational security, since this should be defined within the intraday capacity calculation methodology. The approval of this methodology is therefore a necessary condition for the implementation of the harmonised IDCZGOT. The harmonised IDCZGOT should therefore be applied as of 1 January 2019 or one month after the approval of the intraday capacity calculation methodology, whichever comes later. To ensure a smooth implementation and functioning of the SIDC solution, a provisional IDCZGOT should be set and applied until the harmonised IDCZGOT is applicable.~~

~~The Terms and conditions for IDCZGTsdefine an IDCZGCT in relation to the intraday market time unit on a bidding zone border, whereas all bidding zone borders currently specify the IDCZGCT in relation to the market time unit in the day-ahead timeframe (i.e. one hour). As the definition of the market time unit on the bidding zone border for the intraday timeframe was not legally clear until the adoption of these Terms and conditions, the TSOs need time to adapt. Therefore, these Terms and conditions for IDCZGTs provide for a transition period lasting until 1 January 2021, which also corresponds to the approximate date for harmonisation of imbalance settlement periods in accordance with Article 53 of the Electricity Balancing Regulation, which is used as a reference for clarifying the market time unit. During this transition period, TSOs may implement the IDCZGCT in relation to the delivery hour instead of the market time unit on the bidding zone border.~~

Title 2
Intraday cross-zonal gate opening time and intraday cross-zonal gate closure time

Article 5
Intraday Cross-Zonal Gate Closure Time

1. The IDCZGCT for ~~the~~ all bidding zone borders ~~Estonia-Finland (EE-FI) shall be 30 minutes before the start of the relevant intraday market time unit on that bidding zone border and the IDCZGCT for all other bidding zone borders~~ shall be 30 ~~60~~ minutes before the start of the relevant intraday market time unit on a bidding zone border, as established by Article 8 of Regulation 943/2019 as amended by Regulation 1747/2024~~.~~, subject to paragraph (2).

~~1.~~2. In accordance with Article 8(1a) and 8(1b) of the ~~amended~~ Regulation ~~(EU)~~ 2019/943 ~~of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity~~as amended by EMD Regulation, when the relevant regulatory authority grants a derogation and within the period for which it has been granted, but not later than 1 July 2031, the IDCZGC~~Z~~T shall be 60 minutes before the start of the relevant intraday market time unit on a bidding zone border.~~Until 1 January 2021, the IDCZGCT as defined in paragraph 1 may be applied in relation to the relevant delivery hour rather than in relation to the relevant intraday market time unit on the bidding zone border as defined in Article 2(1) of these Terms and conditions.~~