



To ACER, consultation2018E01@acer.europa.eu

Copenhagen, DATE

PC_2018_E_01 - Consultation on the cross-zonal gate opening and gate closure times for intraday coupling

Nordenergi, the umbrella association of the Nordic electricity industry associations welcomes ACER's consultation on the cross-zonal gate opening and gate closure times for intraday coupling. In general, we emphasize that the trading possibilities for market participants need to be maximal, in terms of available transmission capacities as well as in terms of time.

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. Transitional GOTs could be accepted, but the transition period needs to be reasonable and reasoned. In any case the transition period should not last longer than 12 months.

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. For Baltic, Channel and Hansa the proposed GOTs are not ambitious enough, and the internal GOTs at 15:00 should be implemented as of ACER's decision enters into force.

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?

The proposed 21:00 is not very ambitious, and the transitional GOT should not be later than 18:00 in any CCR.

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.

Alternative A.

The alternative B is too long and alternative C could risk TSOs to delay the implementation of European intraday trading.

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?

Yes. However, would the target date differ from the ACER decision's entry into force date, it would need to be reasoned and in case not be later than 12 from the entry into force of ACER decision.

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.

In principle, the GOT/GCT should be harmonized to the largest extent possible, both between zones and within zones, to facilitate efficient trade. In this case, we highly support the exception as it is improving trading possibilities by allowing trading closer to real time. The development must continue and later allow trading until the operational hour or quarter begins. In addition to having it possible to trade closer to real time, the TSOs need to allow later delivery of binding production plans or to drop them.

The later GCT on EE–FI border has proven that the concept of having GCT closer to real time works, and Nordenergi encourages the Nordic TSOs to implement GCT accordingly (30 minutes before the real time) on all Nordic bidding zone borders.

Exceptions from harmonized GCT where GCT is moved further away from real time than the harmonized solutions not acceptable.

Yours Sincerely,
Lars Aagaard

on behalf of Nordenergi

Nordenergi is the joint collaboration between the Nordic associations for electricity producers, suppliers and distributors. Nordenergi consists of The Danish Energy Association, Energy Norway, Finnish Energy Industries, Samorka – Icelandic Energy and Utilities and Swedenergy.