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Intraday cross-zonal gate closure time (IDCZGOCT) Methodology - 2025

Eurelectric consultation response

May 2025

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:
- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

WG Market Integration & Network Codes

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Eurelectric remarks on the proposed amendment of the Intraday Cross Zonal Gate Opening and Gate Closure Time (IDCZGOCT) Methodology

Eurelectric supports the reduction of the Intraday Cross-Zonal Gate Closure Time from 1 hour to 30 minutes, as mandated by the Electricity Regulation in accordance with the latest Electricity Market Design reform (EU 2024/1747).

The increasingly dynamic and volatile nature of electricity markets, including through the rapid expansion and market integration of intermittent renewable capacity, augments the necessity for market parties to manage their portfolios as close to real-time as possible. This also contributes to system security, as it reduces the imbalance volumes that System Operators need to manage through balancing actions, keeping balancing capacity free to deal with unforeseen incidents.

Reducing the Intraday Cross-Zonal Gate Closure Time allows market participants to access a broader pool of liquidity closer to real-time, facilitating the (re)balancing of portfolios. As the share of intermittent renewables in the generation mix continues to increase and more active load management is performed, the time horizon closer to real-time bears strong value for portfolio balancing. Indeed, uncertainty about the effective distribution of electricity production decreases exponentially when delivery time draws nearer, allowing market participants to align their positions with their intermittent generation. These last trading opportunities are therefore extremely valuable, which is visible in trading activity data. Especially in smaller bidding zones, access to cross-zonal capacity is crucial, as liquidity within local bidding zones may be insufficient.

Eurelectric acknowledges that, for some countries, moving the cross-border intraday gate closure time closer to delivery represents an important shift, notably when it implies changing TSOs' operational balancing processes from a proactive to a reactive approach. In this spirit, the Electricity Regulation foresees the possibility for TSOs to ask for derogations. As stated in article 8, those derogations should be subject to an impact assessment "demonstrating the negative impact of such a measure on the security of supply in the national electricity system, cost-efficiency […], on the integration of renewable energy and on greenhouse gas emissions".

While we acknowledge that TSOs may require implementation time beyond the deadline of 1 January 2026 to ensure safe system operation, **we underline the need for Transmission System Operators to remain fully committed to the timely implementation of this provision of the Electricity Market Design Reform.** In the interest of the energy transition, TSOs should demonstrate why earlier implementation is not feasible or not efficient and avoid unduly dragging out implementation until 2031. On a general note, we recommend avoiding implementation dates that overlap with holiday periods; this will help ensuring a seamless transition and limiting risks to safe operation. Finally, we believe that TSOs should also investigate the possibility to reduce the Intraday Cross-Zonal Gate Closure Time to 30 minutes on non-EU borders parallel to the implementation within the EU.

We thank ENTSO-E for the opportunity to provide feedback to the proposal for amendment:

- In general, it is not clear to which changes the published track-version refers to, as the request for amendment is in our view wholly new. Was the original version already shared with one or more stakeholders, and on which basis were these changes decided?
- Whereas (4): while we acknowledge the factual determination of the Intraday timeframe from right after the day-ahead market to the IDCZGCT, the evaluation about whether this is ‘ample’ time is premature. We therefore request the removal of the last sentence and its replacement with the following: “Any further change to the cross-border intraday gate closure time bringing it closer to delivery should be subject to a positive impact assessment.”
- Whereas (5) : we propose the following reformulation of Whereas (5) to better reflect the wording of the EMD Regulation : ”However, where the amended Methodology for IDCZGCT creates security of supply risks and to allow for a cost-efficient transition to the shorter cross-zonal gate closure time, the transmission system operators have the possibility - as foreseen in Article 8.1 of Regulation (EU) 943/2019 as amended by the EMD Regulation - to request a derogation on the basis of an impact assessment and subject to approval by the regulatory authority concerned, in order to obtain an extension of the implementation timeline. That request includes an action plan with concrete steps towards the implementation of the new intraday cross-zonal gate closure time.
- Art. 5(2): the paragraph should correctly reflect the process as envisioned by Art. 8(1a) and 8(1b) of (EU) 2024/1747, as also reiterated in preamble (3). It should therefore make a clear distinction between the two, distinct derogation periods, with the first one only involving the National Regulatory Authority and the second one also involving ACER.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability

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