

All TSOs' Explanatory Note:

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

2 July 2025

Disclaimer

This explanatory document is submitted by all TSOs to the Agency for the Cooperation of Energy Regulators for information and clarification purposes only accompanying the "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"

1. Introduction to this document

This document is an explanatory note accompanying the proposal for amendment of the Methodology on intraday cross-zonal gate opening and gate closure times (IDCZGOCT), which is a result of the entrance into force of the Electricity Market Design Reform (EMDR) and aims at describing the change of the gate closure time from 60 to 30 minutes ahead of real time.

The amended Methodology on intraday cross-zonal gate opening and gate closure times (IDCZGOCT) takes into account the general principles and goals set in Article 59 of the CACM Regulation, as well as Regulation of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity ('Regulation 943/2019'), 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').

2. Explanation to the proposed change in the Methodology

The amended Methodology for changing the intraday cross-zonal gate closure time (IDCZGCT) facilitates effective competition in the generation, trading and supply of electricity (Article 3(a) of the CACM Regulation) as they establish a harmonized intraday cross-zonal gate opening time (IDCZGOT) just after the end of the day-ahead timeframe and the IDCZGCT 30 minutes before real-time. This provides ample time for market participants to trade across bidding-zone borders in the European Union.

Amending the IDCZGCT from 60 minutes to 30 minutes has significant implications for various TSO processes that take place between the gate closure of the intraday market and real time, including market result validation, matching, balancing, and system security processes. Given the reduced time window for these activities, TSOs will be required to modify the impacted processes and IT systems, which will necessitate additional time for implementation. The most substantial modifications may need to be done at the local level, and the implementation time may differ between TSOs depending on local specificities, potentially resulting in requests for derogations.

In addition, the TSOs are collecting a list of planned derogations considering an implementation timeline. This list will be published on ENTSO-E's website.

3. Annex 1 – Public consultation responses

Organisation	Organisation's response to the public consultation, addressing the question "Do you have any remarks on the proposed amendment of the Intraday Cross Zonal Gate Opening and Gate Closure Time (IDCZGOCT) Methodology? Does the IDCZGOT and IDCZGCT proposal satisfy the needs for harmonization and simplicity?"	All TSOs' replies to organisation's response in the public consultation
Vattenfall AB Nordic	<p>Vattenfall welcomes the opportunity to comment on the common proposal for amendment to the Methodology developed by all Transmission System Operators (TSOs) regarding the intraday cross-zonal gate opening and gate closure times (IDCZGOCT).</p> <p>An improved intraday market, through the possibility to trade imbalances closed to the delivery period both facilitate a more cost-efficient management of imbalances and contribute to a secure system operation.</p> <p>The implementation of a 30-minute ID CZ GCT is crucial for enabling market participants to balance their portfolios closer to real time. This is particularly important for variable renewable energy sources such as wind, where forecast accuracy improves significantly—by up to 20%—within the last hour before delivery. Delaying this implementation limits the ability of market participants to reduce imbalances, which in turn increases the burden on the TSO and the overall system.</p> <p>Thus, Vattenfall does not support to the announced application for derogation until 2029 by individual</p>	<ul style="list-style-type: none"> - The possibility for derogation is granted by the amended Regulation 943/2019, and all TSOs should consider that derogations may be granted. - The justification for the derogation is provided by the relevant TSOs to their National Regulatory Authorities (NRAs) and is not part of the submitted amendment of the IDCZGOCT Methodology.

	<p>member states (e.g. Denmark, Sweden). Postponing the 30-minute ID CZ GCT undermines the ability of market participants to respond to these price signals effectively, as they are denied access to cross-zonal trading closer to real time which is crucial for the efficient functioning of the Nordic electricity market. A granted derogation will postpone a demanded market development and is not sufficiently justified by the arguments presented.</p> <p>The claimed operational and implementation challenges by the danish and swedish TSOs, including the need for automation and network upgrades does not provide clear rationale for why these cannot be addressed by 2027 or 2028. The timeline appears to aim for the latest legally permissible date without sufficiently exploring earlier implementation options.</p> <p>Vattenfall strongly recommend that the 30-minute ID CZ GCT be implemented as soon as operationally feasible and no later than 2027 or 2028. A shorter delay would better align with the objectives of Article 59(2) of the Electricity Balancing Guideline, support market efficiency, and reduce system imbalances in a cost-effective manner.</p>	
EDF	<p>EDF welcomes the ENTSO-E consultation on the intraday cross-zonal gate opening and gate closure times.</p> <p>EDF supports the reduction of the Intraday Cross-Zonal Gate Closure Time from 1 hour to 30 minutes, as mandated by the Electricity Market Design reform (EU 2024/1747), which will provide a market price reflecting more closely the fundamental supply-demand picture close to delivery, and will allow market participants to rebalance their portfolio and re-optimize their schedules</p>	<p>General comments:</p> <ul style="list-style-type: none"> - For further reduction of the IDCZGCT, the TSOs acknowledge and agree with the presented challenges for further reduction of the IDCZGCT. However, for the time being, a further reduction of the IDCZGCT is not foreseen by the TSOs. <p>Detailed/specific comments:</p> <ul style="list-style-type: none"> - For the deleted deefinitions from the CACM Regulation, the CACM related provisions remain valid and relevant. The Whereas section of this amendment reflects the reason behind the

	<p>more efficiently than TSOs could do through balancing processes. This is particularly relevant with the growing penetration of renewable generation.</p> <p>Nevertheless, the transition should be implemented smoothly and carefully, as in some countries, such as France, the shift to 30' GCT will result in a significant transformation of system balancing processes: in particular, it will require RTE to phase out existing Replacement Reserve (RR) balancing products since the intraday and balancing timeframes must not overlap.</p> <p>In this regard, and while EDF calls on TSO to remain fully committed to the timely implementation of this provision, EDF supports the possibility foreseen in Article 8(1a) of Regulation (EU) 943/2019 as amended by the EMD Regulation to request a derogation - subject to approval by the National Regulatory Authority - in order to obtain an extension of the implementation timeline from 1 January 2026 to 1 January 2029.</p> <p>Nevertheless, EDF regrets that this change was introduced through primary legislation rather than under the CACM Regulation, which would have allowed greater flexibility for future amendments of detailed operational rules, and that its impacts were not properly assessed beforehand nor its benefits clearly communicated to stakeholders.</p> <p>Consequently, EDF would like to stress that any further change of the cross-border intraday gate closure time bringing it closer to delivery, should be conditional upon a prior impact assessment clearly demonstrating the</p>	<p>amendment only.</p> <p>- For Article 5(2) of the main body, TSOs modified the wording to clarify the wording: "In accordance with the process described in Article 8(1a) of the Regulation (EU) 2019/943, a TSO may request the concerned regulatory authority to grant a derogation from the requirement of paragraph (1) until 1 January 2029. Upon further request of the TSO, and in accordance with the process described in Art. 8(1b) of the Regulation (EU) 2019/943, the concerned regulatory authority may extend the derogation period until 1 July 2031. Within the derogation period, the IDCZGCT shall be 60 minutes before the start of the relevant intraday market time unit on a bidding zone border." Furthermore, TSOs added 1 more provision in Article 5 - Art. 5.1(5): "In case a TSO has not requested for or been granted a derogation, while its neighbouring TSO(s) is subject to derogation, the concerned TSO shall ensure that the necessary systems, processes, and coordination mechanisms are in place for the implementation of the 30-minute IDCZGCT."</p>
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	<p>impacts and the benefits of such a further change and subject to a public consultation. Indeed, moving the cross-border intraday gate closure time closer to delivery than 30 minutes would be a significant additional change since it would definitely exclude the use of manual products such as mFRR, leaving only TSOs with automatic reserves to manage system imbalances and ultimately resulting in a purely reactive balancing approach.</p> <p>Besides, we appreciate the opportunity provided by ENTSO-E to comment on this amendment proposal:</p> <ul style="list-style-type: none"> • EDF would like to remark that some reminder of definitions from the CACM Regulation were deleted in the Whereas section. Even if these definitions are still relevant as part of the CACM regulation, EDF wonders about the rationale behind this deletion. • Article 5(2) should accurately reflect the process set out in Article 8(1a) and 8(1b) of Regulation (EU) 2024/1747, as also reiterated in Recital (3). It should therefore clearly distinguish between the two separate derogation periods: the first involving only the National Regulatory Authority, and the second also requiring the involvement of ACER. 	
<p>Energy Traders Europe</p>	<p>General comments</p> <p>We fully support the amendment of the cross-zonal intraday gate closure from 60 to 30 minutes before real-time. It allows market participants to better balance surpluses/shortages that are for example caused by changing weather conditions and it enables energy system integration in a cost-effective manner.</p> <p>Therefore, we ask TSOs for early implementation of this</p>	<p>General comments:</p> <ul style="list-style-type: none"> - For the time being, a further reduction of the IDCZGCT is not foreseen by the TSOs. <p>Detailed/specific comments:</p> <ul style="list-style-type: none"> - For whereas (5), TSOs add an additional explanation "in particular due to shorter time for assessing and coordinating remedial actions for congestion management." - For the aspect of derogations: the TSOs indicate that - as the Regulation sets out the conditions for a derogation - the TSOs

	<p>important rule. They should demonstrate in detailed impact assessments all the reasons for possible postponements and avoid as much as possible implementation until 2029 or even 2031.</p> <p>While the amendment is a progress compared to the current cross-zonal intraday gate closure time set at one hour before real time, we believe this can be set even closer in the future.</p> <p>The imbalance settlement period in all EU Member States is now set at 15 minutes before real time and corresponding 15-minute intraday products are in place across nearly all of Europe.</p> <p>Therefore, we ask for coordination between TSOs and NEMOs on this important project for market participants and to report in every Market Coupling Consultative Group on possible derogations.</p> <p>Detailed comments</p> <p>Regarding whereas (5), we disagree with the statement that Regulation (EU) 2024/1747 “acknowledges” the fact that the reducing of the IDCZGCT would have a negative impact on operational security, when providing for the possibility to request a derogation.</p> <p>We rather understand that derogations are only granted if it is proved through an impact assessment that the change in the IDCZGCT would have a negative impact on</p>	<p>cannot set requirements for the NRAs on the approach for granting derogations.</p> <p>- For Article 5(2) of the main body, TSOs modified the wording to clarify the wording: "In accordance with the process described in Article 8(1a) of the Regulation (EU) 2019/943, a TSO may request the concerned regulatory authority to grant a derogation from the requirement of paragraph (1) until 1 January 2029. Upon further request of the TSO, and in accordance with the process described in Art. 8(1b) of the Regulation (EU) 2019/943, the concerned regulatory authority may extend the derogation period until 1 July 2031. Within the derogation period, the IDCZGCT shall be 60 minutes before the start of the relevant intraday market time unit on a bidding zone border." Furthermore, TSOs added 1 more provision in Article 5 - Art. 5.1(5): "In case a TSO has not requested for or been granted a derogation, while its neighbouring TSO(s) is subject to derogation, the concerned TSO shall ensure that the necessary systems, processes, and coordination mechanisms are in place for the implementation of the 30-minute IDCZGCT."</p>
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	<p>operational security. Therefore, we request the preamble be revised to state that derogations are allowed if a negative impact on operational security is proven through an impact assessment.</p> <p>In Art.5§2, there should be a clear distinction between the two derogations processes related to art.8(1a) and art.8(1b) of Regulation (EU) 2024/1747 as it is done in preamble (3). Indeed, the two refer to different derogation periods, the first one involving only NRAs and the second one involving ACER too.</p>	
<p>Swedenergy</p>	<p>An improved intraday market, through the possibility to trade imbalances close to the delivery period both facilitate a more cost-efficient management of imbalances and contribute to a secure system operation. Hence, the whereas(4) should be complemented by this to balance the new wording of whereas(5). The implementation of a 30-minute ID CZ GCT is crucial for enabling market participants to balance their portfolios closer to real time. This is particularly important for variable renewable energy sources such as wind, where forecast accuracy improves significantly—by up to 20%—within the last hour before delivery. Delaying this implementation limits the ability of market participants to reduce imbalances, which in turn increases the burden on the TSO and the overall system. Thus, Swedenergy do not support to the announced application for derogation by individual member states (e.g. Denmark, Sweden). Postponing the 30-minute ID CZ GCT undermines the ability of market participants to respond to these price signals effectively, as they are denied access to cross-zonal trading closer to real time. It is excessive, will work detrimental to much needed</p>	<ul style="list-style-type: none"> - The possibility for derogation is granted by the amended Regulation 943/2019, and all TSOs should consider that derogations may be granted. - The justification for the derogation is provided by the relevant TSOs to their National Regulatory Authorities (NRAs) and is not part of the submitted amendment of the IDCZGOCT Methodology. - For the time being, a further reduction of the IDCZGCT is not foreseen by the TSOs.

	<p>market development and not sufficiently justified by the arguments presented.</p> <p>The claimed operational and implementation challenges, including the need for automation and network upgrades do not provide clear rationale for why these cannot be addressed by 2027 or 2028. The timeline appears to aim for the latest legally permissible date without sufficiently exploring earlier implementation options.</p> <p>Swedenergy strongly recommend that the 30-minute ID CZ GCT be implemented as soon as operationally feasible after the go-live of MARI, and no later than 2027 or 2028. A shorter delay would better align with the objectives of Article 59(2) of the Electricity Balancing Guideline, support market efficiency, and reduce system imbalances in a cost-effective manner.</p>	
<p>Centrica</p>	<p>EXECUTIVE SUMMARY</p> <p>Centrica welcomes the opportunity to provide feedback on your proposal to shorten the intraday cross-zonal gate closure time (IDCZGCT) across Europe.</p> <p>As a specialised trading company with a significant portfolio of optimised assets, we have strong views on a swift implementation to ensure market integration, operational efficiency, and renewable expansion:</p> <ol style="list-style-type: none"> 1. We strongly support the harmonised 30-minute IDCZGCT by 1 January 2026. This will promote liquidity, cross-border efficiency, non-discriminatory access, and real-time system balancing. 2. We encourage ENTSO-E to consider even shorter gate closure times, as this aligns with the evolving electricity 	<ul style="list-style-type: none"> - The possibility for derogation is granted by the amended Regulation 943/2019, and all TSOs should consider that derogations may be granted. - The justification for the derogation is provided by the relevant TSOs to their National Regulatory Authorities (NRAs) and is not part of the submitted amendment of the IDCZGOCT Methodology. - For the time being, a further reduction of the IDCZGCT is not foreseen by the TSOs.

system and improves operational efficiency.

3. We do not support the proposed derogation mechanism, which introduces unnecessary delays and risks market fragmentation.

While acknowledging the complexity of this evolution, we stress the urgency of aligning and shortening gate closure times to meet regulatory objectives and improve operational efficiency. We trust that you will take industry views into account and look forward to a timely implementation. Please feel free to contact us for any further clarification.

DETAILED RESPONSE

1. We strongly support the move to a 30-minute IDCZGCT by 1 January 2026

We strongly support the move towards a harmonised 30-minute intraday cross-zonal gate closure time across all EU Member States by 1 January 2026. This development aligns with the objectives set out in Article 59(1) of the CACM Regulation and Article 8 of Regulation (EU) 2019/943. A coordinated European approach is critical to providing legal certainty and operational coherence for all market participants.

The current disparity in gate closure times across borders undermines the efficiency of cross-zonal trading. A harmonised IDCZGCT will have several benefits, including:

(i) Increased cross-border trading capabilities, particularly for renewable generation and storage operators. This will allow market participants to optimise the use of available flexibility.

(ii) Improved recharging strategies for battery assets and reduced curtailment of renewables, increasing the overall efficiency of the power system.

(iii) More efficient self-balancing by market participants, reducing the need for costly TSO interventions.

A harmonised IDCZGCT is essential for a resilient and flexible power system, facilitating higher shares of renewables while lowering overall balancing costs.

2. We encourage ENTSO-E to consider even shorter gate closure times

While we fully support the move to a 30-minute IDCZGCT, we encourage ENTSO-E to consider the possibility of even shorter gate closure times. The electricity system is moving rapidly towards real-time operation, as evidenced by the adoption of the 15-minute imbalance settlement period and intraday products across Europe. The 30-minute IDCZGCT should be seen as a transitional step, rather than the target model.

We operate weather-dependent assets, where the accuracy of output forecasts improves considerably in the final minutes before delivery. Shortening the IDCZGCT will

enable us to better manage imbalances and take advantage of improved forecast accuracy. Moreover, shorter gate closure times enhance the system's resilience to unplanned events. For example, in the event of an outage, market participants with access to a liquid intraday market can rebalance their portfolio swiftly, reducing strain on system operators and preserving system stability.

Therefore, we recommend that ENTSO-E explores the potential for even shorter gate closure times.

3. We do not support the proposed derogation mechanism

We oppose the proposed derogation mechanism, which unnecessarily delays the timely implementation of a harmonised IDCZGCT, possibly until 2031. While we understand that certain technical challenges may arise, we remain of the view that derogations should remain the exception, rather than the norm. Key concerns with the derogation proposal include:

+E7(i) Sequential implementation: The go-live date for each border is determined by the longest derogation period on each side of the border. This delays the benefits of harmonisation for most of the market and undermines the coordination of European market processes.

(ii) Market fragmentation: Persisting differences in gate closure times will perpetuate operational complexity, limit liquidity, and hinder the integration of European

	<p>electricity markets.</p> <p>(iii) Regulatory uncertainty: Prolonged derogation periods create regulatory uncertainty, weakening the investment signals required to support long-term infrastructure development and innovation.</p> <p>Given the importance of timely implementation, we urge you to reconsider the proposed process and pursue a more ambitious timeline:</p> <p>(i) Prioritise a timely implementation by 1 January 2026, in accordance with applicable regulation.</p> <p>(ii) Allow derogations only after a detailed cost-benefit analysis and clear support expressed by stakeholders during public consultations.</p> <p>(iii) Limit derogations to a single one-year extension, until no later than 1 January 2027.</p> <p>(iv) Ensure transparency in the criteria and process for granting derogations.</p>	
<p>Eurelectric</p>	<p>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).</p> <p>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</p>	<p>General comments:</p> <ul style="list-style-type: none"> - Regarding the implementation time, TSOs generally avoid implementation during holiday periods, but it is not always possible. -Concerning the non-EU borders, this methodology is to be applied for borders participating in SIDC, so gate closure of 30 minutes before the start of the relevant MTU would apply to non-EU borders participating in SIDC as well (subject to derogations and the possibility of different arrangements in agreement on electricity cooperation between the European Union and the

	<p>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.</p> <p>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.</p> <p>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,</p>	<p>concerned 3rd country).</p> <p>Detailed/specific comments:</p> <ul style="list-style-type: none"> - For the track-changes version, TSOs clarify that the current amendment proposal is on the current bidding methodology approved by ACER on 24 April 2018 by ACER Decision No 04/2018. - For whereas (4), TSOs replace "ample" with "more" and the last sentence now becomes "This provides more time for market participants to trade across bidding-zone borders in the Union." - For whereas (5), TSOs add an additional explanation "in particular due to shorter time for assessing and coordinating remedial actions for congestion management." - For Article 5(2) of the main body, TSOs modified the wording to clarify the wording: "In accordance with the process described in Article 8(1a) of the Regulation (EU) 2019/943, a TSO may request the concerned regulatory authority to grant a derogation from the requirement of paragraph (1) until 1 January 2029. Upon further request of the TSO, and in accordance with the process described in Art. 8(1b) of the Regulation (EU) 2019/943, the concerned regulatory authority may extend the derogation period until 1 July 2031. Within the derogation period, the IDCZGCT shall be 60 minutes before the start of the relevant intraday market time unit on a bidding zone border." Furthermore, TSOs added 1 more provision in Article 5 - Art. 5.1(5): "In case a TSO has not requested for or been granted a derogation, while its neighbouring TSO(s) is subject to derogation, the concerned TSO shall ensure that the necessary systems, processes, and coordination mechanisms are in place for the implementation of the 30-minute IDCZGCT."
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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.