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Elia Transmission Belgium  
Online Reply form

Amsterdam, 11-06-2025

## **Reply to Elia's public consultation on the request for derogation from implementation of the IDCZGCT 30 minutes**

EPEX SPOT thank you for the opportunity to provide our view of the request for derogation of implementation of 30 min cross-zonal gate closure time (GTC) in the intraday electricity market.

Following your document, conclusions from discussions with TSOs and the similar derogation requests from Energinet, SvK and BCAB, we understand that several countries will need a derogation. We therefore hereby address the points at a general level. We hope that our input can encourage a cooperation between TSOs on this topic, which we will come back to later.

### **Shorter GCT enables the energy transition, should have a reducing effect on balancing need and allows for more trading opportunities**

Overall, it is clear why the 30 min GCT should be implemented. We assume that our trading members and other market participants will also emphasize again that trading opportunities shall be maximized. We therefore do not see the need to repeat all the arguments and documentation of these reasons in our answer to this consultation.

### **EPEX SPOT trusts the assessment of Elia**

As a NEMO, it is not our place to evaluate national security of supply levels. It is clear that cost-efficiency and renewable energy integration should be maximized. EPEX SPOT well understands the pressure of many implementation projects taking place at the same time. We appreciate the preference to first implement a number of planned projects before starting on 30 min GCT in order to ensure the robustness of the overall system.

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**Minimizing derogation time in order to limit negative impact of the derogation**

While the need for delay is respected, the delay and derogation time should be minimized as much as possible in order to limit the negative impact on the power market, energy transition and cost efficiency. By definition, a delay and a derogation make the benefits of the implementation of the 30 min CGT change visible only at a later stage, sometimes even reinforcing the need to further delay.

**Urge for synchronization/harmonization between TSOs on these types of derogations**

From a European NEMO's perspective, EPEX SPOT urges for harmonization of these types of derogations as much as possible. Implementation waves with groups of bidding zones borders would be beneficial, both for the sake of overall efficiency in implementation costs as well as human resources being able to meet deadlines for other necessary projects. Harmonization of derogations would also limit the necessary updates to trading patterns and tools of market participants to a reasonable number. The maximum derogation request is until January 1, 2029. EPEX SPOT appreciates the intention of Elia to limit the delay in implementation by requesting a shortened derogation time until 31st of March 2027. EPEX SPOT is ready today and will be able to implement whenever TSOs are ready. However, as stated, it is more efficient to implement with less individual timings and solutions.

In case you have any questions, comments or topics you would like to discuss, please do not hesitate to contact us.

Kind regards,  
Ina

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