

## Nord Pool's response to the public consultation on the request for derogation from implementation of the intraday cross-zonal gate closure time 30 minutes ahead of real time (copy from reply form)

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- **Organization:** Nord Pool
- **Comments/suggestions to the consultation:** To begin with Nord Pool (active NEMO in Belgium and in 13 other EU MS' plus Norway) appreciates the opportunity to provide comments to ELIA's background information about e.g. the fundamental reasons and benefits put forward by the European Commission to implement the legal requirement in Article 8 of the amended Electricity Regulation (EU) 2024/1747, namely that "From 1 JAN 2026, the intraday cross zonal gate closure time shall not be more than 30 minutes ahead of real time". Likewise we appreciate ELIA's "Impact Assessment and Action Plan..." document since it provides explanations to technical, procedural and other aspects that motivates ELIA's request for a limited time of derogation before implementing maximum 30 minute GCT for intraday (SIDC) trading cross border and within Belgium. On a principal and general level, e.g. for all EU MS', we disagree with derogations from the stipulated implementation time of 1.1.2026. This view is also based on that we agree with the EC' high level assessments about the added, and over time growing, value and benefits of intraday trading, including until or beyond 30 minutes before delivery within bidding zones and cross border. We note and appreciate that ELIA in the consultation documentation largely speaking agree with those positive assessments and even gives further arguments in that direction. That said, we also find that ELIA's description of technical and other aspects, which motivates their request for a derogation until preliminary Q1-2027 is adequate, while more detailing on some points would have been appreciated. We also appreciate the there is a clearly outlined action plan, including HL timeline and dependencies to resolve the stated blocking issues. On this basis we find that the requested ELIA derogation limited until Q1-2027 is justified and acceptable. We look forward to in 2027, based on ELIA's action plan and support from adjacent TSOs, be able to facilitate intraday (SIDC) trading closer to delivery in Belgium and cross border and not least given the significant added efficiency, technically and economically, it will enable for all market parties and for the overall power (grid) system.