

12 June 2025

Consultation response on the Intraday cross-zonal gate closure time

Dear Elia,

Centrica welcomes the opportunity to provide feedback on your proposal to delay the implementation of the 30-minute intraday cross-zonal gate closure time (IDCZGCT) from 1 January 2026 to 31 March 2027.

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:

- 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.
- We encourage Elia to consider even shorter gate closure times, as this aligns with the evolving electricity system and improves operational efficiency.
- We do not support the proposed derogation, which introduces unnecessary delays, legal uncertainty, and market fragmentation risks.

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.

Yours sincerely,

Patrick Adigbli

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Centrica



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 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:

- Increased cross-border trading capabilities, particularly for renewable generation and storage operators. This will allow market participants to optimise the use of available flexibility.
- Improved recharging strategies for battery assets and reduced curtailment of renewables, increasing the overall efficiency of the power system.
- More efficient self-balancing by market participants, reducing the need for costly TSO interventions.

We encourage Elia to consider even shorter gate closure times

While we fully support the move to a 30-minute IDCZGCT, we encourage Elia 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.

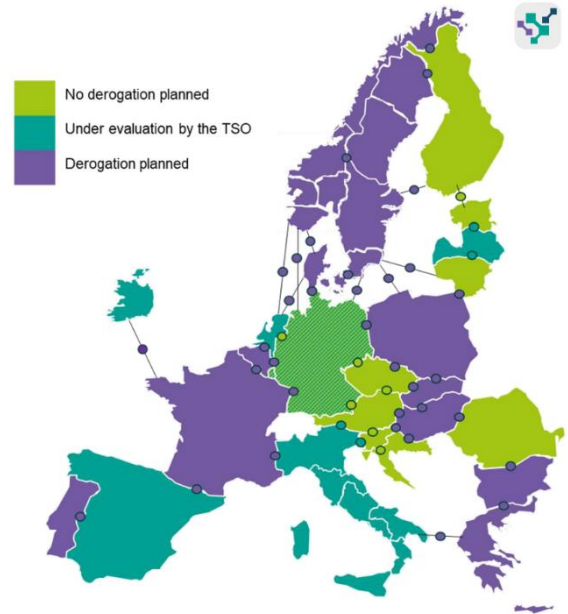
We operate weather-dependent assets, where the accuracy of output forecasts improves considerably in the final minutes before delivery. Shortening the IDCZGCT will enable us to better manage imbalances and take advantage of improved forecast accuracy. Moreover, shorter gate closure times enhance the 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.

We do not support the proposed derogation

We oppose the proposed derogation, which unnecessarily delays the timely implementation of a harmonised IDCZGCT. 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:

- **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.
- **Market fragmentation:** Persisting differences in gate closure times, as shown on the map, will perpetuate operational complexity, limit liquidity, and hinder the integration of European electricity markets.
- **Regulatory uncertainty:** Prolonged derogation periods create regulatory uncertainty, weakening the investment signals required to support long-term infrastructure development and innovation.



Given the importance of timely implementation, we urge you to reconsider the proposed derogation and prioritise a timely implementation by 1 January 2026, in accordance with applicable regulation.