



AUTEUR

TenneT TSO B.V.

DATUM

7 oktober 2025

PAGINA

1 van 8

## Derogation request for the implementation of the intraday cross zonal gate closure time 30 minutes ahead of real-time

## **Table of Contents**

|                                             |          |
|---------------------------------------------|----------|
| <b>1. Introduction</b>                      | <b>3</b> |
| <b>2. Legal basis</b>                       | <b>4</b> |
| <b>3. Impact assessment and action plan</b> | <b>5</b> |
| <b>4. Public consultation</b>               | <b>6</b> |
| <b>5. Request for derogation</b>            | <b>8</b> |

## 1. Introduction

In March 2023, the European Commission proposed a reform of the Electricity Market Design to address rising energy prices, volatility, and energy security concerns. This reform, adopted as Regulation (EU) 2024/1747 and effective from July 2024, aims to strengthen consumer protection, support renewable integration, and enhance industrial competitiveness.

A key provision of the reform is the shortening of the intraday cross-zonal gate closure time (ID CZ GCT) to a maximum of 30 minutes ahead of real time, effective from 1 January 2026. This measure is intended to improve the responsiveness of intraday markets, allowing market participants to trade closer to delivery using the most accurate forecasts available. It supports better portfolio balancing, reduces imbalance costs, and improves access to cross-border liquidity.

TenneT TSO B.V. supports this transition and acknowledges its benefits. However, due to the time required to upgrade critical operational processes, particularly grid security analysis, TenneT requests a one-year derogation to ensure that system security is not compromised during implementation.

## 2. Legal basis

With the entry into force of the Electricity Market Design Reform (Regulation (EU) 2024/1747) Article 8 of Regulation 2019/943 has been amended, and the intraday gate closure time to trade energy across bidding zones has been set at not more than 30 minutes ahead of real time as of 1 January 2026.

Article 8 (1a) provides that a transmission system operator may request with its regulatory authority a derogation from the requirement of an intraday cross-zonal gate closure time maximum 30 minutes ahead of real time until 1 January 2029.

The derogation request shall include:

- an impact assessment, taking into account feedback from NEMOs and market participants concerned, demonstrating the negative impact of such a measure on the security of supply in the national electricity system, cost-efficiency, including in relation to existing balancing platforms in accordance with Regulation (EU) 2017/2195, on the integration of renewable energy and on greenhouse gas emissions; and
- an action plan aiming to shorten the intraday cross-zonal gate closure time to 30 minutes ahead of real time by 1 January 2029.

This request for derogation is a request of TenneT to derogate from the implementation deadline of the provisions on the maximum intraday cross-zonal gate closure time in Article 8 (1) of Regulation (EU) 2019/943 (recast) after the amendments of Regulation (EU) 2024/1747, in accordance with Article 8(1a). This request contains a justification of the need for the derogation, an impact assessment of the requested derogation and an action plan aiming to shorten the intraday cross-zonal gate closure time to 30 minutes ahead of real time (latest) by 14 January 2027 in line with Article 8 (1a)(a) and Article (1a)(b) of Regulation (EU) 2019/943.

TenneT's request is made to ACM in accordance with Article 8(1a) of Regulation (EU) 2019/943.

### 3. Impact assessment and action plan

TenneT published the before mentioned impact assessment and action plan to allow stakeholder to present their feedback. In short TenneT explained that shortening the ID CZ GCT increases the risk of real-time overloads due to missing trade data between 60 and 30 minutes before real time. This will hinder TenneT in identifying possible overloads for the upcoming hour. It also limits the time available for TenneT to prepare the activation of curative remedial actions. This will be resolved when TenneT finishes the upgrade of its grid security analysis tool, where the all trades until gate closure are input for the tool. Also a much faster computation will allow for enough time to analyze mitigation actions in case of overloads. The impact assessment and action plan is annexed to this request.

During the public consultation, stakeholders could provide their feedback on TenneTs impact assessment and action plan. TenneT organized the feedback gathering in the following structure:

1. The general opinion on the assessment
2. Feedback on the action plan
3. Impact of 30 min IDCZGCT on balancing market
4. Expectations with regards to an earlier go-live by TenneT TSO
5. Other feedback

The report on the public consultation is annexed to this request.

## 4. Public consultation

During the public consultation TenneT received responses from 8 individual stakeholders. TenneT gathered all feedback and provided a response to all in a dedicated report on its website. The report will be annexed to this request for derogation. Below the key points from stakeholders are summarized.

### General opinion on the assessment

Most stakeholders emphasized the importance of reducing the ID CZ GCT to 30 minutes, citing benefits for market liquidity, renewable integration, and improved balancing.

While several parties expressed regret over the delayed go-live, they acknowledged TenneT's operational constraints. Some stakeholders challenged the grid security concerns, arguing that a shorter gate closure time could enhance operational security.

TenneT responded by recognizing the potential benefits but stressed the necessity of having a final forecast of the operational situation after gate closure. This requires the upgraded Grid Security Analysis (GSA) tooling, which is scheduled for go-live in 2026.

### Feedback on the action plan

Most stakeholders expressed appreciation for TenneT's decision to request a derogation of only one year, and emphasized the importance of avoiding any extension beyond this period. Additionally, several parties recommended harmonizing go-live dates across bidding zone borders and avoiding implementation on 1 January. TenneT acknowledged these concerns and confirmed that the go-live will not take place on 1 January. While a launch at the end of 2026 would be ideal, TenneT proposes 14 January 2027 as the derogation end date to allow for flexibility.

Some responses requested more detail on the specific curative remedial actions TenneT will implement and how these are included in the IT system planning. TenneT responded it is focussing on investigating which curative remedial actions exist and in which manner these can be incorporated in operational procedures.

### Impact on balancing market

There was broad consensus among stakeholders that a shorter gate closure time would benefit the balancing market. Improved portfolio balancing, reduced imbalance costs, and enhanced integration of renewable energy sources were frequently cited. TenneT welcomed these insights and confirmed that they align with its own expectations.

### Expectation for an earlier implementation

Several stakeholders urged TenneT to implement the 30-minute GCT as early as possible.

TenneT acknowledged this request and confirmed that it will continue to assess opportunities to accelerate implementation, provided system security can be maintained.

### Other feedback

Some parties noted that German TSOs are ready for 30-minute GCT without derogation and questioned why TenneT requires additional time. TenneT clarified that while it cannot speak on behalf of German TSOs, one

possible explanation is that German grid security tooling already supports 30-minute gate closure, as internal trading in Germany is permitted up to 30 minutes before real time.

## 5. Request for derogation

Based on the impact assessment, stakeholder consultation, and the outlined action plan, TenneT TSO B.V. formally requests a derogation from the implementation deadline of the 30-minute intraday cross-zonal gate closure time (ID CZ GCT) as stipulated in Article 8(1) of Regulation (EU) 2019/943, amended by Regulation (EU) 2024/1747, for the bidding zone borders Netherlands-Belgium and Netherlands-Germany.

TenneT requests a derogation until **14 January 2027**, instead of 1 January 2026, to ensure a secure and coordinated transition. This timeline reflects:

- The need to complete critical upgrades to grid security analysis and congestion management processes.
- The importance of aligning implementation with operational readiness and cross-border coordination.
- Feedback from stakeholders supporting a one-year derogation and recommending a go-live date that avoids the holiday period.

TenneT remains fully committed to the timely and secure implementation of the 30-minute ID CZ GCT and will continue to engage transparently with market participants and regulatory authorities throughout the transition.