

Case No: 92890
Document No: 1585291
Decision No: 138/26/COL

EFTA SURVEILLANCE AUTHORITY DECISION

of 14 October 2026

on the intraday cross-zonal gate opening and gate closure times for Norway

THE EFTA SURVEILLANCE AUTHORITY,

Having regard to:

the Agreement on the European Economic Area¹ ('the EEA Agreement'), in particular to Article 24 and Annex IV thereof,

the Act referred to at point 47 of Annex IV to the EEA Agreement:

Regulation (EC) No 713/2009 of the European Parliament and of the Council of 13 July 2009 establishing an Agency for the Cooperation of Energy Regulators ('the ACER Regulation'),² and in particular Article 8 thereof, as adapted to the EEA Agreement,³

the procedure referred to at point 47(d) of Annex IV to the EEA Agreement,

the Act referred to at point 49 of Annex IV to the EEA Agreement:

Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management ('the CACM Regulation'),⁴ and in particular Articles 9(6)(k) and 59 thereof, as adapted to the EEA Agreement,⁵

Whereas:

1 INTRODUCTION

- (1) The CACM Regulation lays down a range of requirements for cross-zonal capacity allocation and congestion management in the day-ahead and intraday electricity markets. Chapter 6 of the CACM Regulation specifies the requirements for the single intraday coupling, and Section 2 outlines the requirements for the single intraday coupling process. Finally, Article 59 of the CACM Regulation, concerning the

¹ OJ L 1, 3.1.1994, p. 3.

² OJ L 211, 14.8.2009, p. 1.

³ EEA Joint Committee Decision No. 93/2017 of 5 May 2017.

⁴ OJ L 197, 25.7.2015, p. 24.

⁵ EEA Joint Committee Decision No. 204/2020 of 11 December 2020.

operation of the single intraday coupling, sets out the rules on the intraday cross-zonal gate opening and gate closure times.

- (2) Norway is part of the internal market for electricity through the EEA Agreement. The objective of the EEA Agreement is to create a homogeneous European Economic Area ('EEA'). Relevant EU legislation for the internal electricity market is incorporated into the EEA Agreement so that it applies throughout the whole EEA, ensuring uniform application of laws relating to this market and thus ensuring a level playing field throughout the EEA. Upon incorporation of the EU legislation into the EEA Agreement, Norway has the obligation to implement the *acquis* covered by this legislation.
- (3) The CACM Regulation was incorporated into the EEA Agreement by Decision of the EEA Joint Committee No. 204/2020, which entered into force on 31 July 2021.⁶ It is therefore appropriate to apply the CACM Regulation's requirements on the intraday cross-zonal gate opening and gate closure times ('IDCZGTs') to Norway.
- (4) The present Decision follows from the request of the Norwegian regulatory authority ('RME') that the EFTA Surveillance Authority ('the Authority') adopts a decision for Norway on two proposals it received from the Norwegian TSO, Statnett, for the terms and conditions for the IDCZGTs, namely:
 - All TSOs' proposal for intraday cross-zonal gate opening and gate closure times in accordance with Article 59 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management ('the Initial Proposal'); and
 - 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 ('the Amendment Proposal').

These two proposals are referred together in this Decision as the 'Proposals'.

- (5) The present Decision includes the following annexes:

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| Annex I | to Decision No. 138/26/COL of 14 October 2026 on the intraday cross-zonal gate opening and gate closure times for Norway, Determining the intraday cross-zonal gate opening and gate closure times for Norway in accordance with Article 59 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management, as amended and approved by the EFTA Surveillance Authority (Document No. 1585290). |
| Annex II | to Decision No. 138/26/COL of 14 October 2026 on the intraday cross-zonal gate opening and gate closure times for Norway, Amending the 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, as amended and approved by the EFTA Surveillance Authority (Document No. 1588512). |

⁶ The CACM Regulation was made binding in the internal legal order in Norway through national measures, which entered into force on 1 August 2021.

For information purposes only, the Authority's Decision is accompanied by texts providing a track-changed versions of the Proposals, reflecting the Authority's amendments (Documents No. 1627338 and 1627339).

2 PROCEDURE

- (6) On 21 May 2024, the Norwegian TSO submitted to RME the Initial Proposal for the determination of the IDCZGTs.
- (7) RME requested on 27 September 2024 (Documents No. 1487196 and 1487197) the Authority to decide on the Initial Proposal in accordance with point 47 of Annex IV to the EEA Agreement, in particular the adaptations set out in paragraph (d) thereof for the application of Article 8(1)(b) of the ACER Regulation, as incorporated into the EEA Agreement by Decision of the EEA Joint Committee No. 93/2017, and Article 9(11) of the CACM Regulation, as incorporated into the EEA Agreement by Decision of the EEA Joint Committee No. 204/2020 and having regard in particular to paragraph (9) of the preamble thereof.
- (8) RME completed its request on 14 July 2025, sending to the Authority for decision the Amendment Proposal (Documents No. 1549767 and 1549768), following receipt of the Amendment Proposal from the Norwegian TSO on 3 July 2025.
- (9) On 27 November 2024 and 7 November 2025, the Authority requested the European Union Agency for the Cooperation of Energy Regulators ('ACER') to prepare drafts for the Authority's decision on the Proposals in accordance with point 47(d)(iv) of Annex IV to the EEA Agreement (Documents No. 1500326 and 1568719).
- (10) On 11 December 2024 and 2 February 2026, ACER provided the Authority with drafts for the Authority's decision on the Proposals, in accordance with point 47(d)(iv) of Annex IV to the EEA Agreement.⁷
- (11) On 17 September 2026, the Authority invited RME to express its views on the Authority's preliminary decision, in accordance with point 47(d)(iv) of Annex IV to the EEA Agreement (Documents No. 1626232, 1626237, 1626236, 1626235, 1626234 and 1626233).
- (12) On 24 September 2026, RME shared its views on the Authority's preliminary decision (Document No. 1627334). These views are summarised in section 5 of this Decision.
- (13) This Decision is issued following the Authority's review and amendment of the Proposals, in cooperation with ACER. Annex I and Annex II to this Decision set for Norway the IDCZGTs, pursuant to Article 59 of the CACM Regulation, as amended and approved by the Authority.
- (14) The Authority's Decision determines the IDCZGTs solely for Norway.
- (15) For the purposes of this Decision, it is relevant to note that Statnett cooperated with the EU TSOs ('EU TSOs') for the development of the IDCZGTs which is the subject of the present Decision.

⁷ Documents No. 1505737, 1505747, 1505753, 1505749, 1505751, 1505746, 1505752, 1505748, 1505750, 1588148, 1588150, 1588151, 1588152, 1588153, 1588154 and 1588155.

- (16) The IDCZGT methodology for the EU has been subject of two ACER Decisions, namely Decisions No. 04/2018⁸ and 11/2025.⁹
- (17) The proposals subject to ACER Decisions No. 04/2018 and 11/2025 for the EU ('EU Proposals') were published for public consultations by the EU TSOs and Statnett. The public consultations took place respectively from 18 April to 18 May 2016 and 24 April to 24 May 2025.
- (18) ACER, when taking its Decisions No. 04/2018 and 11/2025 for the EU, held numerous dialogues and exchanges with the relevant EEA TSOs and national regulatory authorities. The dialogues and exchanges, as well as the public consultation organised by the TSOs when developing the EU Proposals, are documented in detail in ACER Decisions No. 04/2018 and 11/2025 for the EU.
- (19) The content of the Proposals, received by the Authority from RME, is aligned on the EU Proposals' content, upon which ACER decided for the EU by Decisions No. 04/2018 and 11/2025.

3 THE AUTHORITY'S COMPETENCE TO DECIDE ON THE PROPOSALS

- (20) In accordance with point 47(d)(i) of Annex IV to the EEA Agreement, adapting Article 8 of the ACER Regulation, in cases involving one or more EFTA State(s), the Authority is to adopt a decision addressed to the national regulatory authorities of the concerned EFTA State(s), where ACER is competent on the EU side.
- (21) RME referred to the Authority (i) on 27 September 2024 the Initial Proposal, and (ii) on 14 July 2025 the Amendment Proposal for decision in accordance with point 47(d)(i) of Annex IV to the EEA Agreement, adapting Article 8(1)(b) of the ACER Regulation
- (22) The Proposals' content falls within the scope of Article 59 of the CACM Regulation. The CACM Regulation was incorporated at point 49 of Annex IV to the EEA Agreement by Decision of the EEA Joint Committee No. 204/2020, which entered into force on 31 July 2021.
- (23) Following the incorporation of the CACM Regulation into the EEA Agreement, the IDCZGTs methodology involves one EFTA State, namely Norway. In the EU, ACER decided on the corresponding proposal through binding decisions.
- (24) Consequently, it is the Authority's competence to adopt a decision addressed to RME to determine the IDCZGTs methodology for Norway.

⁸ ACER Decision No. 04/2018 of 24 April 2018 on all transmission system operators' proposal for intraday cross-zonal gate opening and intraday cross-zonal gate closure times. The decision is available under this link: https://acer.europa.eu/sites/default/files/documents/Individual%20Decisions/ACER%20Decision%2004-2018%20on%20IDCZGTs_0.pdf. Annex I to ACER Decision No. 04/2018 is available under this link: https://acer.europa.eu/sites/default/files/documents/Individual%20Decisions_annex/Annex%2520I_rectified_ACER%2520Decision%252004-2018_0.pdf.

⁹ ACER Decision No. 11/2025 of 19 December 2025 on amendments to the intraday cross-zonal gate opening and gate closure times. The decision is available under this link: <https://acer.europa.eu/sites/default/files/documents/Individual%20Decisions/ACER-Decision-11-2025-intraday-cross-zonal-gate-times.pdf>. Annex I to ACER Decision No. 11/2025 is available under this link: https://acer.europa.eu/sites/default/files/documents/Individual%20Decisions_annex/ACER-Decision-11-2025-intraday-cross-zonal-gate-times-AnnexI_0.pdf.

4 SUMMARY OF THE PROPOSALS

(25) The Initial Proposal includes the following elements:

- (a) a 'Whereas' section, which describes the expected impact of the IDCZGTs on the objectives set out in Article 3 of the CACM Regulation;
- (b) general provisions, including the scope of application and harmonised definitions, in Articles 1, 2 and 3;
- (c) provisions on the IDCZGTs specified for each of the capacity calculation regions ('CCRs') in Article 4, principles for establishment of the future default pan-European intraday cross-zonal gate opening times ('IDCZGOT') in Article 5 and the setting of the intraday cross-zonal gate closure times ('IDCZGCT') in Article 6; and
- (d) final provisions, including publication, timeline for implementation and the applicable language in Articles 7 and 8.

(26) The Initial Proposal provides that all TSOs should (i) publish the IDCZGTs Initial Proposal without undue delay after approval and (ii) implement the IDCZGTs immediately after implementation of the single intraday coupling in accordance with Articles 7(3), 17(3), 20, 27(2) and 37 of the CACM Regulation on the relevant bidding zone borders.

(27) The Amendment Proposal includes the following elements:

- (a) 'Whereas section': The recitals clarify that the proposed amendments aim to ensure consistency of the IDCZGTs with Article 53 (1) of Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing ('the EB Regulation')¹⁰ and the updated EU regulatory framework, namely Article 8(4) of Regulation 2019/943 of the European Parliament and of the Council of 5 June 2019 on the internal market for electricity ('Regulation (EU) 2019/943'),¹¹ as amended by Regulation (EU) 2024/1747 of the European Parliament and of the Council of 13 June 2024,¹² according to which all TSOs need to apply the imbalance settlement period of 15 minutes in all scheduling areas while ensuring that all boundaries of market time unit shall coincide with boundaries of the imbalance settlement period from 1 January 2025 at the latest.
- (b) Amendment of Article 5: Article 5 is amended to establish a 30-minute IDCZGCT for all bidding zone borders as of 1 January 2026 in accordance with Article 59(3) of the CACM Regulation and the updated EU regulatory framework, namely Article 8(1) of Regulation (EU) 2019/943, subject to possible derogations in accordance with Articles 8(1a) and 8(1b) of Regulation (EU) 2019/943.
- (c) Introduction of Article 5a: This new article sets out the implementation timeline for the 30-minute IDCZGCT and includes the following paragraphs:

¹⁰ OJ L 312, 28.11.2017, p. 6, incorporated into point 52 of Annex IV to the EEA Agreement by Decision of the EEA Joint Committee No. 207/2020 of 11 December 2020.

¹¹ OJ L 158, 14.6.2019, p. 54, not incorporated into the EEA Agreement at the time of this Decision.

¹² OJ L, 26.6.2024, not incorporated into the EEA Agreement at the time of this Decision.

- i. Paragraphs (1) to (3), which set out the implementation timeline for the 30-minute IDCZGCT and specify the applicable dates and obligations, including:
 - (a) where a TSO has not submitted a request for derogation and shall therefore implement the 30-minute IDCZGCT as of 1 January 2026;
 - (b) where a TSO has submitted a derogation request; and
 - (c) where, following the first derogation, a TSO has submitted a subsequent derogation request to the relevant NRAs and to ACER.
 - ii. Paragraph (4), which specifies that, where a bidding zone border begins participating in the single intraday coupling after 31 December 2025, the applicable IDCZGCT shall be determined based on the date on which the relevant border started participation and the status of any derogations granted to the TSOs for that border.
 - iii. Paragraph (5), which clarifies that, where a TSO has neither requested nor been granted a derogation, while its neighbouring TSO(s) is(are) subject to a derogation, the concerned TSO shall ensure that all necessary systems, processes, and coordination mechanisms are in place to implement the 30-minute IDCZGCT.
- (d) An Appendix, which includes a list of TSOs to which the IDCZGTs apply.

5 OBSERVATIONS RECEIVED BY THE AUTHORITY

- (28) RME found that the adaptation made in the Authority's preliminary decision to define the gate opening time to 15:00 for all regions is in accordance with Article 3(e) of the CACM Regulation to achieve fair and non-discriminatory treatment of market participants. RME found that setting the intraday gate opening time to 15:00 gives balance between allowing sufficient time after the day-ahead auction and opening the market as early as possible, thereby enabling market participants to adjust their positions.
- (29) RME further observed that shortening the gate closure time to maximum 30 minutes will allow market participants to adjust their positions closer to real time. In RME's view, allowing market participants to adjust their positions closer to real time is important to support the efficient integration of variable renewable electricity generation. Shortening the gate closure time can also reduce imbalances for market participants and improve system balance, thereby reducing balancing costs for TSOs.
- (30) RME stressed that according to Article 59(3) of the CACM Regulation, the intraday gate closure time should be at most 60 minutes before real time but allows for a shorter gate closure time to be set in the methodology and that according to Article 59(2) of the CACM Regulation, the cross-zonal gate closure time should aim at maximising trading opportunities close to real time while also ensuring sufficient time for balancing and secure system operation.
- (31) RME highlighted that the introduction of a shorter gate closure time therefore requires TSOs' balancing systems to be capable of performing the necessary operational processes in a secure manner within a shorter timeframe (30 minutes instead of the current 60 minutes). Under the proposed methodology amendment, the deadline for implementing a 30-minute gate closure time is 1 January 2026. In order to accommodate the shorter gate closure time, it may require significant changes to the

operational procedures. TSOs may therefore require more time to shift towards a 30-minute gate closure time.

- (32) RME considered that the proposed amendment to the methodology therefore allows TSOs to apply to their regulatory authorities for a derogation from the shorter gate closure time. A derogation may initially be granted until 1 January 2029. If a TSO is still unable to implement the shorter gate closure time by then, a further application may be submitted and approved, extending the derogation up to an additional maximum of 2.5 years.
- (33) RME found the proposed amendment consistent with Article 59(2) of the CACM Regulation, as it allows the intraday cross-zonal gate closure time to be set in such a way that it maximises market participants' opportunities for adjusting their balances by trading in the intraday market time-frame as close as possible to real time, while at the same time providing TSOs and market participants with sufficient time for their scheduling and balancing processes in relation to network and operational security.
- (34) Furthermore, RME found that the proposed amendment is consistent with Article 59(3) of CACM, as it will establish one intraday cross-zonal gate closure time for each market time unit for a given bidding zone border. This gate closure time will be at most one hour before the start of the relevant market time unit and take into account the relevant balancing processes in relation to operational security.
- (35) RME considered that the methodology may contribute to ensuring effective trading and supply of electricity while ensuring operational security in accordance with the purposes set out in Articles 3(a) and (c) of the CACM Regulation.
- (36) RME welcomed the adaptations made by the Authority to reflect the relevant legal framework of the CACM Regulation and the Third Energy Package, as incorporated into the EEA Agreement. RME considered that these adaptations were necessary, and appropriate to ensure a homogeneous approach.
- (37) RME found that the content of the preliminary decision fell within the scope of Article 59 of the CACM Regulation. Furthermore, RME found that the CACM Regulation and the Electricity Regulation provided the relevant framework for the determination of the IDCZGTs for Norway as set out in the Authority's preliminary decision.

6 ASSESSMENT OF THE PROPOSALS

6.1. Legal framework

6.1.1. General requirements

- (38) In terms of content of any proposal for terms and conditions or methodologies, Article 9(9) of the CACM Regulation generally requires the proposals to include a proposed timescale for their implementation and a description of their expected impact on the objectives of the CACM Regulation.
- (39) Articles 9(13), 12 and 59 of the CACM Regulation require that the proposal for the IDCZGTs methodology, including its amendment, is subject to a consultation under Article 12 of the CACM Regulation.

6.1.2. Specific requirements

- (40) Article 2(37) of the CACM Regulation defines the intraday market timeframe as the time after the IDCZGOT and before the IDCZGCT, where for each market time unit, products are traded prior to their delivery.

- (41) Article 2(38) of the CACM Regulation defines the IDCZGOT as the point in time when cross-zonal capacity between bidding zones is released.
- (42) Article 2(39) of the CACM Regulation defines the IDCZGCT as the point in time where cross-zonal capacity allocation is no longer permitted.
- (43) Article 9(6)(k) of the CACM Regulation makes the proposal for the IDCZGTs subject to approval.
- (44) Article 59 of the CACM Regulation sets out specific requirements for the IDCZGTs.
- (45) According to Article 59(1) of the CACM Regulation, the proposal for the IDCZGTs is to be developed within 16 months after the entry into force of the CACM Regulation.
- (46) Article 59(2) of the CACM Regulation provides that IDCZGTs are to be established in such a way as to maximise market participants' opportunities to adjust their positions as close as possible to real time, while ensuring that both TSOs and market participants have sufficient time for scheduling, balancing, and maintaining operational security.
- (47) Furthermore, Articles 59(3) to (5) of the CACM Regulation stipulate that for each bidding zone border and market time unit, a single IDCZGCT is to be established no later than one hour before the start of the relevant market time unit, taking into account balancing processes and operational security; intraday trading for a given market time unit shall start at the latest at the relevant intraday cross-zonal gate opening time and remain possible until the gate closure time; before the IDCZGCT, market participants shall submit all orders to the relevant nominated electricity market operators ('NEMOs'), which shall, without delay, forward such orders for single matching.
- (48) According to the Authority's Decision No. 097/25/COL of 25 June 2025 on products that can be taken into account in the single intraday coupling for Norway ('Authority's ID Products Decision'),¹³ in connection with Article 53(1) of the EB Regulation, NEMOs are required to provide market participants with the opportunity to trade in energy in time intervals which are at least as short as the imbalance settlement period for both day-ahead and intraday markets, i.e. 15' market time unit ('MTU') in single intraday coupling ('SIDC'), once introduced.
- (49) As outlined in section 1, Article 1 of the EEA Agreement defines the aim of the EEA Agreement as achieving a homogeneous EEA based on common rules and equal conditions of competition.
- (50) The Decisions of the EEA Joint Committee No. 93/2017 and No. 204/2020 set up a mechanism catering for homogenous interpretation and application of the ACER and CACM Regulations throughout the EEA. Under these acts, the Authority is the competent entity to issue binding decisions *vis-à-vis* the concerned national regulatory authorities of the EFTA States in cases involving one or more EFTA State(s), where ACER is competent on the EU side. The decisions of the Authority are to be based on drafts prepared by ACER. The Authority is to invite the national regulatory authorities of the EFTA States to express their views on the matter, taking full account of the urgency, complexity and potential consequences of the matter.

¹³ Available at:

<https://www.eftasurv.int/cms/sites/default/files/documents/gopro/Case%2093074%20College%20Decision%20097%2025%20COL%20-%20Norway%20-%20Decision%20on%20products%20that%20can%20be%20taken%20into%20account%20in%20the%20single.pdf>

6.2. Assessment of the general legal requirements

- (51) The Proposal provides the IDCZGTs methodology for Norway.
- (52) Considering the objective of the EEA Agreement to achieve a homogeneous EEA based on common rules, stated above in sections 1 and 6.1, the Authority is to adopt decisions consistent with decisions taken by ACER on similar matters.
- (53) The essence of the CACM Regulation and IDCZGTs methodology call for a homogeneous approach. The IDCZGTs is inherent to the SIDC. The SIDC relies on a common algorithm, incorporated in the Cross Border Intraday ('XBID') solution, developed in cooperation between NEMOs and TSOs under the frame of the CACM Regulation. The Norwegian bidding zones participate in SIDC and thus in practice apply the IDCZGTs. As a consequence, any divergent requirement for the IDCZGTs for Norway would alter the level playing-field and thus the good functioning of the internal electricity market.
- (54) The Authority, in cooperation with ACER, assessed the compliance of the Initial Proposal and Amendment Proposal with the requirements incorporated into the EEA Agreement under the CACM Regulation and here above recalled. It raises the following consideration in support of its amendment to the Proposals.

6.3. Assessment of the legal requirements in the Initial Proposal

6.3.1. Public consultation

- (55) As detailed in section 2 of this decision, Statnett consulted on the Initial Proposal. Therefore, the Initial Proposal complies with Article 12 of the CACM Regulation.

6.3.2. Expected impact on the objectives of the CACM Regulation

- (56) Recitals (12) to (16) of the Initial Proposal describe the expected impact on the objectives listed in Article 3 of the CACM Regulation.
- (57) In the Initial Proposal, the impact on the objectives of the CACM Regulation is mentioned explicitly for the provisions of Articles 3(a), (c), (e), (h) and (j) of the CACM Regulation, while only implicitly for the provisions of Article 3(i) of that Regulation.
- (58) As the Initial Proposal does not specifically address all the objectives of the CACM Regulation, it does not fully comply with the requirement of Article 9(9) of that Regulation.
- (59) As regards the substance of the described impact, the Authority only partially agrees with the description in recitals (12) to (16) of the Initial Proposal. Most notably, the Authority disagrees that the proposed regionally-harmonised IDCZGOT facilitates the objective of promoting effective competition in the generation, trading and supply of electricity (Article 3(a) of the CACM Regulation) and the objective of providing non-discriminatory access to cross-zonal capacity (Article 3(j) of the CACM Regulation). The Authority thus deems it necessary to amend the description of the expected impact of the harmonised IDCZGOT on the objectives addressed in the Initial Proposal, as well as to add the description of the impact on the objectives that are not addressed in the Initial Proposal, i.e. Articles 3(b), (d), (f) and (g) of the CACM Regulation.

6.3.3. Intraday cross-zonal gate opening time

- (60) Articles 4 and 5 of the Initial Proposal determine the IDCZGOTs at CCR level and pan-European level, respectively.

- (61) Therefore, the Initial Proposal complies with the requirement in Article 59(1) of the CACM Regulation of proposing IDCZGOTs.
- (62) As regards the substance, Article 4 of the Initial Proposal defines regionally (CCR) harmonised IDCZGOTs for all bidding zone borders ranging from 15:00 market time day-ahead to 22:00 market time day-ahead. Article 5 of the Initial Proposal aims to establish principles for the future harmonisation, by obliging TSOs to review the possibility further to harmonise the IDCZGOTs in the future. However, the Authority notes that Article 5 of the Initial Proposal fails to address the request made by the EU regulatory authorities in the context of ACER Decision No. 04/2018 that the future default IDCZGOT be set at the IDCZGOT of the CCR with the earliest IDCZGOT and that any deviation from this future default IDCZGOT be duly justified.
- (63) Although EEA-wide harmonisation of IDCZGOTs is not explicitly required by Article 59 of the CACM Regulation, the Authority considers that the harmonisation is needed to meet the objectives of the CACM Regulation, in particular those referred to in Articles 3(e), (h), and (j) thereof.
- (64) First, harmonisation of IDCZGOTs is essential to achieve fair and non-discriminatory treatment of market participants in accordance with Article 3(e) of the CACM Regulation, namely to avoid discrimination in the time of access to the network between, on the one hand, market participants trading across bidding zones and thus requesting access to cross-zonal capacity and, on the other hand, market participants trading inside bidding zones and thus requesting access to internal network. Since this discrimination will exist until all internal intraday gate opening times – which are not in the scope of this Decision – in all bidding zones are equal to the IDCZGOT, the Authority, having regard to the need to ensure homogeneity with ACER Decision No. 04/2018 for the EU, finds it important that the timeframe for cross-zonal trade should be aligned with the timeframe for trading inside bidding zones to the maximum extent possible.¹⁴
- (65) Second, harmonisation of the IDCZGOTs is also necessary to achieve non-discriminatory access to cross-zonal capacity in accordance with Article 3(j) of the CACM Regulation. By defining harmonised IDCZGOTs at regional (CCR) level only, the Initial Proposal *de facto* discriminates market participants in CCRs with late IDCZGOTs in accessing the cross-zonal capacity compared to market participants in CCRs with earlier IDCZGOTs.
- (66) Finally, the IDCZGOTs as proposed in the Initial Proposal would imply a difference of seven hours between the earliest IDCZGOT and the latest IDCZGOT in the various CCRs. This would, in the Authority's view, have a generally disruptive effect on the operation of the intraday market and would create a confusion among market participants to organise their activities and, in particular to understand price formation at a specific moment.¹⁵ The IDCZGOT equal to 22:00 market time day-ahead would also not provide sufficient time to market participants to trade for the first few market time units of the delivery day.¹⁶ For these reasons, the Initial Proposal does not meet the objective of respecting the need for a fair and orderly market and price formation in accordance with Article 3(h) of the CACM Regulation.
- (67) The Authority understands that an IDCZGOT at 15:00 market time day-ahead, proposed by the EU regulatory authorities in the context of ACER Decision No.

¹⁴ See also paragraph 70.

¹⁵ For example, the merit order lists visible to market participants in some bidding zones would significantly change every time the gate opens on additional bidding zone borders.

¹⁶ For example, the intraday market for the first delivery hour of the delivery day (i.e. 00:00 – 01:00) would be open for one hour only (i.e. between 22:00 and 23:00).

04/2018 for the EU, represents a balance between the need for some market participants, on the one hand, to finalise the processes (e.g. portfolio optimisation, scheduling) resulting from the day-ahead market and, on the other hand, to adjust their day-ahead positions in the intraday market as soon as possible. The Authority considers that a gate opening at 15:00 market time day-ahead provides sufficient time for market participants to finalise their day-ahead processes. The Authority is, however, aware that an IDCZGOT at 15:00 market time day-ahead might cause an overlap between day-ahead and intraday timeframes in some bidding zones or regions due to existing scheduling rules. The flexibility available to TSOs in determining the volume of cross-zonal capacities at the IDCZGOT as described further below provides TSOs with sufficient time gradually to adapt these rules and phase out these overlaps.

- (68) The Authority notes the reserves from TSOs to the harmonisation of IDCZGOTs at 15:00 market time day-ahead in the context of ACER Decision No. 04/2018 for the EU. The reserves indicated that: (i) not all TSOs agree with the objective to harmonise the IDCZGOT at 15:00 market time day-ahead and (ii) those TSOs that do agree with this harmonisation target have different views on when this target could be achieved.
- (69) TSOs stated, in the context of ACER Decision No. 04/2018 for the EU, different reasons for objecting to the harmonisation of IDCZGOTs at 15:00 market time day-ahead. TSOs in one CCR considered that cross-zonal capacities remaining after the day-ahead timeframe can be offered to the intraday timeframe at 15:00 and intraday capacity calculation as well as congestion management can be performed in parallel to continuous intraday trading within and between bidding zones. Nevertheless, most TSOs in the EEA argued that offering the remaining cross-zonal capacities to the intraday timeframe as from 15:00 market time day-ahead onwards was not possible in their CCRs, claiming that:
 - (a) intraday capacity calculation cannot be performed during continuous intraday trading between bidding zones and therefore the intraday market within and/or between bidding zones should not open until the intraday capacity calculation is finished. According to current TSOs planning, the intraday capacity calculation could finish at 21:00 and therefore these capacities could be offered to the intraday market at 22:00;
 - (b) TSOs' internal and cross-zonal congestion management, namely operational security analysis and (coordinated) redispatching and countertrading cannot be performed during continuous intraday trading within and/or between bidding zones and therefore the intraday market should not open until these congestion management processes are finalised. A specific case of this reason is the integrated scheduling process operated by TSOs with a central dispatching model. Completion of these processes is, according to these TSOs, essential for starting the intraday capacity calculation and this is the reason why the intraday capacity calculation takes such a long time;
 - (c) the cross-zonal intraday market cannot open before the scheduling and planning processes resulting from the day-ahead market are finalised. With this regard, TSOs mentioned that, in most markets, the deadline for delivering the day-ahead schedules to TSOs is 15:30 market time day-ahead¹⁷ and therefore the IDCZGOT at 15:00 market time day-ahead would cause an overlap of day-ahead and intraday timeframes.

¹⁷ Article 43(2) of the CACM Regulation defines 15:30 as the maximum deadline by which NEMOs need to deliver to the scheduled exchange calculator the information needed to calculate scheduled exchanges.

- (70) Considering the need for homogeneity and aligning on ACER Decision No. 04/2018 for the EU, the Authority considers that the concerns raised by TSOs are not valid reasons to avoid the EEA-wide harmonisation of IDCZGOTs at 15:00 market time day-ahead.
- (71) Indeed, the reasons stated by those TSOs who claimed that they cannot offer cross-zonal capacities remaining after the day-ahead market at 15:00 market time day-ahead essentially relate to the complex interdependencies between regional (as well as national) congestion management, capacity calculation, scheduling and cross-zonal (as well as internal) intraday trading. The Authority acknowledges that those interdependencies may indeed affect both the amount of cross-zonal capacity and the time by when it can effectively be offered to the intraday market. Nevertheless, since these latter elements have to comply with operational security, the Authority considers that they can only be determined within the context of the intraday capacity calculation methodology in accordance with Articles 20 and 21 of the CACM Regulation.¹⁸ In this framework, the IDCZGOT can, therefore, only be understood as a general rule for when TSOs have to release the available cross-zonal capacity to the market, whereas the rules on how much cross-zonal capacity TSOs have to offer and at which times during the intraday timeframe fall within the scope of the regional intraday capacity calculation methodology. In that respect, the TSOs' concerns related to the intraday capacity calculation, internal and cross-zonal congestion management and scheduling could, if properly justified, be taken into account by defining, within the intraday capacity calculation methodology, the amount of capacity being made available at different times during the intraday market timeframe.
- (72) The Authority notes that the purpose of the IDCZGOT is also to define the time when the SIDC starts and therefore market participants can start bidding and trading within the SIDC solution. In that respect, an early EEA-wide harmonised IDCZGOT at 15:00 market time day-ahead has the advantage, compared to the Initial Proposal, to facilitate trading and competition inside bidding zones, as well as competition between NEMOs inside bidding zones (i.e. sharing of order books and matching of products).
- (73) Considering the need to ensure homogeneity, the Authority aligned the timeline for the implementation of the IDCZGOT on the one set by ACER Decision No. 04/2018 for the EU, requiring the application of the harmonised IDCZGOT by 1 January 2019 or, in case of delays in the approval of the relevant regional intraday capacity calculation methodologies in a CCR, one month after the approval date in the respective CCR.
- (74) The Authority also considers it necessary to clarify that within the current legal framework of the CACM Regulation, the gate opening for intraday trading within a bidding zone and for complementary regional intraday auctions in accordance with Article 63 of the CACM Regulation are outside the scope of the Decision on IDCZGOTs. With this respect, where the TSOs of a CCR were to decide, in the context of the intraday capacity calculation methodology, to offer the cross-zonal capacities remaining after the single day-ahead coupling to the intraday market at 15:00 market time day-ahead, some TSOs of such CCR, could still in principle address their specific national concerns with local trading rules by which the intraday market within such bidding zones would open after 15:00 market time day-ahead.

¹⁸ Article 14(2) of the CACM Regulation requires that “[F]or the intraday market time-frame, individual values for cross-zonal capacity for each remaining intraday market time unit shall be calculated.” Since the intraday timeframe is, according to Article 2(37) of the CACM Regulation, defined as the timeframe between IDCZGOT and IDCZGCT, Article 14(2) of that Regulation therefore implies that any capacity offered by TSOs within the intraday market timeframe should be calculated or defined pursuant to the intraday capacity calculation methodology.

- (75) The solution for harmonisation of the IDCZGOTs described above therefore provides for the EEA-wide harmonisation of the IDCZGOTs, while allowing some flexibility to define (within different complementary rules) when and how much cross-zonal capacity the TSOs can offer to the market and when the intraday markets inside bidding zones open. Nevertheless, the Authority finds it important that TSOs and regulatory authorities strive towards full harmonisation of all related timelines such that internal and cross-zonal intraday gate opening times as well as the time when TSOs offer cross-zonal capacities remaining after the day-ahead market gradually converge towards the target solution of 15:00 market time day-ahead. This would imply that some TSOs need gradually to adapt their congestion management procedures, such that they can be applied in parallel to the operation of the intraday market.

6.3.4. Intraday cross-zonal gate closure time

- (76) Article 6 of the Initial Proposal determines the IDCZGCTs for all bidding zone borders.
- (77) Therefore, the Initial Proposal complies with the requirement in Article 59(1) of the CACM Regulation of proposing the IDCZGCTs.
- (78) Article 6 of the Initial Proposal sets the IDCZGCT at 60 minutes for all bidding zone borders participating in the SIDC, except for the Estonia-Finland bidding zone border where the IDCZGCT is set to 30 minutes before the start of the relevant intraday market time unit.
- (79) The Authority understands that the proposed IDCZGCTs in the Initial Proposal are an attempt from TSOs to find a balance between two conflicting objectives defined by Article 59(2) of the CACM Regulation, i.e.:
- (a) to maximise market participants' opportunities for adjusting their balances by trading in the intraday market timeframe as close as possible to real time; and
 - (b) to provide TSOs and market participants with sufficient time for their scheduling and balancing processes in relation to network and operational security.
- (80) In the Authority's view, the balance between these two objectives proposed by TSOs is based on a rather conservative estimate of the time needed by TSOs and market participants for their scheduling and balancing processes in relation to network and operational security. In this respect, the Authority is unable to assess the possibility and the effort required by TSOs further to reduce these timings.
- (81) Nevertheless, these timings are also affected by the implementation of the Electricity Balancing Regulation. For this reason, the Authority finds the Initial Proposal's conservative approach as justified at this stage. Nevertheless, once the above uncertainties are resolved and sufficient experience is gained with the balancing processes in the context of the integrated electricity balancing market, TSOs should, in the Authority's view, further minimise the time needed for scheduling and balancing operations and thus further maximise market participants' opportunities for adjusting their balances by trading in the intraday market timeframe as close as possible to real time. The Authority notes that such amendment is proposed in the Amendment Proposal, and assessed below in section 6.4 to this Decision.
- (82) Article 59(3) of the CACM Regulation requires that the proposal establishes one IDCZGCT for each market time unit for a given bidding zone border. Article 6 of the Initial Proposal sets the IDCZGCT in relation to the start of the relevant intraday market time unit, but it fails to provide clarity on what the relevant market time unit on the bidding zone border is.

- (83) To address the lack of clarity, the Authority amended the Initial Proposal by providing further clarity in recital (9) and Article 2 of Annex I to this Decision. Recital (9) of Annex I refers to the definition of the market time unit as provided by Article 2(19) of Regulation (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council ('Transparency Regulation'),¹⁹ i.e.: *"market time unit is the period for which the market price is established or the shortest possible common time period for the two bidding zones, if their market time units are different"*. As regards the market time unit within a bidding zone, the Authority understands that this unit corresponds (i.e. is equal) to the imbalance settlement period as defined in the Electricity Balancing Regulation. Recital (9) of Annex I further clarifies that, in the context of the intraday market time unit on a bidding zone border, this definition implies a comparison of two applicable market time units within the bidding zones on both sides of the border and the definition of the market time unit on the border between them as the longer of the two, since such unit is considered as the 'shortest possible' common unit on this border. For example, in case two bidding zones had market time units equal to 15' and 30', respectively, the shortest possible market time unit on their common border would be 30'. This is because the bidding zone with a market time unit of 30' could not accommodate 15' products if these products were to be traded across the border, whereas the bidding zone with a market time unit of 15' could also accommodate 30' products if the latter were to be traded across the border. Based on such clarification of Article 2(19) of the Transparency Regulation, the Authority specifically clarified the intraday market time unit on a bidding zone border in Article 2 of Annex I to this Decision to the effect that the market time unit on the bidding zone border should be considered as the longer of the two imbalance settlement periods on either side of the bidding zone border.
- (84) The Authority also considered the concerns raised by TSOs in the context of ACER Decision No. 04/2018 for the EU that the clarification of Article 2(19) of the Transparency Regulation implies a significant change to the existing practices, since currently all bidding zone borders specify the IDCZGCT in relation to the market time unit in the day-ahead timeframe (i.e. one hour) instead of the market time unit in the intraday timeframe (which can be 60', 30' or 15'). Since this clarification is essential for establishing legal clarity on the application of IDCZGCT, and aligning on ACER Decision No. 04/2018 for the EU, the Authority addressed TSOs concerns by providing for a transitional period during which TSOs may apply the IDCZGCT in relation to the delivery hour rather than in relation to the intraday market time unit on those borders. Considering the need for homogeneity, the Authority aligned the transition period on the one set in ACER Decision No. 04/2018 for the EU, namely until 1 January 2021.

6.3.5. Proposed timescale for implementation

- (85) Article 7(2) of the Initial Proposal defines that all TSOs shall implement the provisions of its Articles 4 and 6 after the implementation of the single intraday coupling in accordance with Articles 7(3) and 37 of the CACM Regulation, of the common grid model methodology in accordance with Article 17 of the CACM Regulation, of the capacity calculation methodology in accordance with Article 20 of the CACM Regulation and the establishment of the relevant coordinated capacity calculator in accordance with Article 27(2) of the CACM Regulation on the relevant bidding zone borders.
- (86) The Initial Proposal therefore complies with the requirement of proposing the implementation timescale in accordance with Article 9(9) of the CACM Regulation.

¹⁹ As incorporated into point 48 of Annex IV to the EEA Agreement by Decision of the EEA Joint Committee No. 93/2017 of 5 May 2017.

- (87) Aligning on ACER decision No. 04/2018 for the EU, the Authority finds it reasonable and justified that the whole Initial Proposal (not just Articles 4 and 6) is implemented after the implementation of the SIDC. However, other conditions for its implementation (i.e. the implementation of the common grid model methodology, of the capacity calculation methodology and the establishment of the relevant coordinated capacity calculator) are, in the Authority's view, not relevant prerequisites. The Authority notes that TSOs, in the context of ACER Decision No. 04/2018 for the EU, justified this proposal with the reasoning that these are the prerequisites for capacity allocation that is compliant with the CACM Regulation. The Authority notes, aligning on ACER's approach in its Decision No. 04/2018 for the EU, however, that the above conditions are related to capacity calculation rather than capacity allocation.
- (88) Since the Authority has amended the Initial Proposal such that the IDCZGOT is independent from the intraday capacity calculation (see paragraph 71 *et seq*), the conditions proposed in the Initial Proposal related to capacity calculation are no longer relevant. For this reason, the Authority removed these conditions from the rules on the IDCZGTs as adopted in Annex I. The Authority is of the opinion that the rules on the IDCZGTs should generally be implemented at the start of the SIDC operation and should apply for all bidding zone borders participating in the SIDC. This implementation timescale should equally apply to IDCZGOTs and IDCZGCTs, even though the initially applied IDCZGOTs and IDCZGCTs are considered as a transitional solution until the target solutions for both can be implemented.

6.3.6. Assessment of other points of the Initial Proposal

- (89) Having regard to the need to ensure homogeneity, the Authority, in Article 5 of Annex I to this Decision, clarified that the IDCZGOT at the bidding zone border Estonia-Finland (EE-FI) should not be considered as an exception, but rather as a preferred solution since it maximises opportunities for market participants to adjust their balances as close as possible to real time, while still respecting the time needed for TSOs and market participants for their scheduling and balancing processes in relation to network and operational security.
- (90) The Authority introduced several additional editorial amendments. The most significant ones relate to the transformation of the document into a legal format which enables its enforceability. Further, the ordering of some chapters has been changed in order to improve readability and clarity.
- (91) The Authority made changes in the 'whereas' section, Articles 1 and 2 of the Initial Proposal to reflect the application of this Decision for Norway, the applicable legal framework and the adaptations foreseen for the incorporation of the relevant legal framework into the EEA Agreement.
- (92) The Authority also amended Article 6 of the Initial Proposal to reflect the procedure set out in point 47 of Annex IV to the EEA Agreement for the determination of the IDCZGTs methodology for Norway.²⁰

6.4. **Assessment of the legal requirements in the Amendment Proposal**

6.4.1. Assessment of the general requirements for the development and content of the Amendment Proposal

²⁰ For the avoidance of doubt, deadlines set out in the Proposal, as amended by the Authority, that precede the date of implementation of the IDCZGT methodology annexed to the present Decision are to be understood as references to the date of implementation of this methodology.

- (93) Statnett jointly developed with the EU TSOs an amendment proposal for the IDCZGT as described in section 2 above. Statnett's Amendment Proposal, submitted to RME, is aligned on the content of the EU Amendment Proposal upon which ACER decided for the EU. Statnett submitted the Amendment Proposal to RME on 3 July 2025.
- (94) The Amendment Proposal was subject to a public consultation, from 24 April 2025 to 24 May 2025, as explained above in section 2.²¹
- (95) Article 5a of the Amendment Proposal proposes a timescale for implementing the amendments introducing a 30-minute IDCZGCT and describes the relevant impacts in light of the CACM Regulation. These impacts are assessed in the amended recitals of the Amendment Proposal.
- (96) The Amendment Proposal therefore complies with the requirements for the development and for the content of the Amendment Proposal specified in Articles 9(9), 9(13) and 12 of the CACM Regulation.

6.4.2. Assessment of the specific requirements for the development and content of the Amendment Proposal

- (97) Article 5 of the Proposal provides for the reduction of the IDCZGCT to 30 minutes ahead of real time for all bidding zone borders, effective from 1 January 2026, and subject to derogations.
- (98) By introducing the 30-minute IDCZGCT, the Amendment Proposal reflects the requirements set out in Article 59(2) of the CACM Regulation, namely to: (a) maximise market participants' opportunities to adjust their positions by trading in the intraday market timeframe as close as possible to real time; and (b) provide TSOs and market participants with sufficient time to perform their scheduling and balancing processes, thereby ensuring network and operational security.
- (99) The conditions set out in Articles 59(3) of the CACM Regulation, which require that a single intraday cross-zonal gate closure time shall be established for each market time unit for a given bidding zone border and that such time shall not exceed one hour before the start of the relevant market time unit, are thereby also complied with. The requirements of Articles 59(4) and 59(5) of the CACM Regulation are also reflected in the Proposal.
- (100) Accordingly, and bearing in mind the need to ensure homogeneity with ACER Decision No. 11/2025 for the EU, the Amendment Proposal is in compliance with Articles 59(1) to (5) of the CACM Regulation.

6.4.3. Derogation granted to TSOs and implementation of 30 minutes IDCZGCT on their concerned bidding zone borders

- (101) The Amendment Proposal, in homogeneity with the approach for the EU, allows TSOs to request a derogation to postpone the implementation of the 30-minute IDCZGCT until 1 January 2029, and, through, a second request for derogation, for an additional maximum of 2.5 years.
- (102) Bearing in mind the need for homogeneity and aligning on ACER Decision No. 11/2025 for the EU, the Authority considers that the terms and conditions would benefit from greater clarity, the Authority explicitly delineated the individual responsibility of each TSO to implement the 30-minute IDCZGCT within the applicable timeline.

²¹ More information on the consultation available: <https://consultations.entsoe.eu/markets/intraday-cross-zonal-gate-closure-time-idczgoct-me/>

- (103) The Authority, bearing in mind the need to ensure homogeneity with ACER Decision No. 11/2025 for the EU, also acknowledges that a derogation granted to one TSO affects the possibility to implement the 30-minute IDCZGCT on its bidding zone borders also for the TSO(s) on the other side of those bidding zone borders. Consequently, it is appropriate not to apply the 30-minute IDCZGCT on those borders until the derogation has expired, in line with the requirement for uniform application of the IDCZGCT for each bidding zone border. At the same time, the TSO(s) on the other side of those borders, even if ready to implement the 30-minute IDCZGCT and having all necessary local developments in place, should not be required to obtain a derogation as it is clear from the existing derogation that 30-minute IDCZGCT will not be applicable. Instead, such TSO(s) may continue applying the 60-minute IDCZGCT for the duration of the derogation(s) granted to the adjacent TSO(s). At the same time, they should ensure that the necessary systems, processes, and coordination mechanisms are in place to enable the timely implementation of the 30-minute IDCZGCT, independently of the derogation status or progress of neighbouring TSOs. Upon the expiry of all derogations granted to each TSO on a given border, the 30-minute IDCZGCT needs to be applied simultaneously and without delay by each TSO concerned.
- (104) For the avoidance of doubt, bearing in mind the need for homogeneity and aligning on ACER Decision No. 11/2025 for the EU, the Authority understands that national regulatory authorities are not prevented to grant a derogation for a period shorter than the period requested by the TSO and set an earlier implementation date than January 2029.
- (105) Accordingly, the Authority has revised Article 5a(5) of the Amendment Proposal to reflect the above points. These changes are outlined in the attached Annex II.

6.4.4. Interpretation of “before the start of the relevant intraday market time unit” as “ahead of real-time”

- (106) The Proposal refers to the 30-minute IDCZGCT as occurring “*30 minutes before the start of the relevant Intraday Market Time Unit (MTU)*,” in line with the provision pursuant to Article 59(3) of the CACM Regulation. The Authority notes from ACER Decision No. 11/2025 for the EU that Article 8(1) of Regulation (EU) 2019/943 refers to this point in time as “*30 minutes ahead of real-time*.”
- (107) Market participants are allowed to submit their orders for a given market time up until the respective intraday gate closure time. Once these orders are cleared between respective market participants, the market participants are required to supply or consume the corresponding amount of electricity traded for that market time unit.
- (108) Aligning on ACER’s approach in its Decision No. 11/2025 for the EU and bearing in mind the need for homogeneity, the Authority understands that the start of the relevant market time unit corresponds to the “*real-time*”, since 30 minutes before the start of the relevant market time unit is the latest possible moment in time that electricity can be traded for delivery in real time.

6.4.5. Provisions concerning the IDCZGCT on bidding zones borders with Energy Community Contracting Parties

- (109) The IDCZGTs are terms and conditions adopted under Article 59(1) of the CACM Regulation, which also apply to Energy Community (‘EnC’) Contracting Parties in accordance with Article 9(6)(k) of the CACM Regulation, as incorporated and adapted by the Ministerial Council Decision 2022/03/MC-EnC of 15 December 2022 (‘EnC CACM Regulation’). Therefore, any amendments to the IDCZGTs, such as the present shift to a 30-minute IDCZGCT, will in principle also apply to bidding zone

borders both with and between the EnC Contracting Parties, once the EnC CACM regulation is transposed into national law of each of the EnC Contracting parties.

- (110) While the provisions concerning the application of the IDCZTs to the Energy Community Contracting Parties are as such not relevant for Norway, they follow from the need to have homogeneous terms and conditions for the entire interconnected market, based on a proposal from all TSOs, including Statnett.
- (111) As a consequence, and bearing in mind the need to ensure homogeneity, the Authority amended the relevant provisions in the Amendment Proposal (Article 5(3)) in line with the changes made by ACER in its Decision No. 11/2025 for the EU.

6.4.6. Related amendments

- (112) On whereas (5) of the Amendment Proposal: this paragraph considers only the potential negative impacts. Even in terms of negative impacts, the reasoning provided is limited, focusing mainly on congestion issues. However, the implementation could affect a broader range of system operation elements beyond congestion. Furthermore, aligning on ACER's approach in its Decision No. 11/2025 for the EU and bearing in mind the need for homogeneity, the Authority does not consider that shorter IDCZGCT will invariably have an adverse effect on operational security, and that this impact is to be demonstrated. Therefore, the Authority has revised this provision.
- (113) On Article 3 of the Amendment Proposal, Application of these terms and conditions: in Article 3 of the Amendment Proposal, it is stated that the gate opening and gate closure times for intraday trading within a bidding zone and for "*complementary regional intraday auction*" in accordance with Article 63 of the CACM Regulation are outside the scope of these terms and conditions. As "*complementary regional intraday auctions*" have now been replaced by intraday auctions, and considering TSOs' feedback in the frame of ACER Decision No. 11/2025 for the EU, the Authority has removed the reference to "*complementary regional intraday auctions*" in Article 3 of the Amendment Proposal.
- (114) On Article 4 of the Intraday Cross-Zonal Gate Opening Time: the Authority has removed the outdated provisions contained in Article 4 of the Amendment Proposal. Specifically, this concerns Article 4(1) in its entirety, as well as the second sentence of Article 4(2). These provisions were considered no longer relevant or applicable in the current context, and therefore the Authority has excluded them from the revised text to ensure consistency and alignment with the updated framework.
- (115) The Authority has also made additional editorial and/or structural changes to the Amendment Proposal to ensure clarity and consistency of the amended IDCZGTs.
- (116) The Authority made changes in the 'whereas' section and Articles 1, 2, 5, 5a and 6 of the Amendment Proposal to reflect the application of this Decision for Norway, the applicable legal framework and the adaptations foreseen for the incorporation of the relevant legal framework into the EEA Agreement.
- (117) The Authority also introduced a new paragraph in Article 5a of the Amendment Proposal to reflect the procedure set out in point 47 of Annex IV to the EEA Agreement for the determination of the IDCZGTs methodology for Norway.²²

²² For the avoidance of doubt, deadlines set out in the Amendment Proposal, as amended by the Authority, that precede the date of approval of the IDCZGTs methodology annexed to the present Decision are to be understood as references to the date of approval of this methodology.

7 CONCLUSION

(118) For the above reasons, the Authority considers the Proposals in line with the CACM Regulation, provided that the amendments described in this Decision are integrated in the Proposals, as presented in Annex I and Annex II. The amendments ensure that the Proposals are in line with the purpose of the CACM Regulation, and contribute to market integration, non-discrimination, effective competition and the proper functioning of the market.

(119) Therefore, the Authority approves the Proposals subject to the necessary amendments. Annex I and Annex II to this Decision set out the Proposals as amended and approved by the Authority,

HAS ADOPTED THIS DECISION:

1. This Decision applies to Norway.
2. The determination of the IDCZGTs methodology for Norway, pursuant to Article 59 of the CACM Regulation, is approved as set out in Annex I and Annex II to this Decision. Annexes I and II form an integral part of this Decision.
3. This Decision is addressed to RME.
4. This Decision enters into force upon notification to RME.
5. This Decision is authentic in the English language.

Done at Brussels.

For the EFTA Surveillance Authority

Arne Røksund
President

Árni Páll Árnason
Responsible College Member

Nuscha Wieczorek
College Member

Melpo-Menie Joséphidès
Countersigning as Director,
Legal and Executive Affairs

This document has been electronically authenticated by Arne Roeksund, Melpo-Menie Josephides.