

# 5th Market Coupling Consultative Group Workshop

26 February 2024



### Agenda – morning session

AGENDA				
TIME	DURATION	MORNING SESSION	PRESENTER	
09:00 - 09:10	10 min	Welcome, review of the action points logged in the last meeting	Hélène Robaye, Thomas Van Den Broucke, Pierre Milon (MCCG Convenors)	
09:10 – 10:10	60 min	<ul> <li>SDAC operational timings</li> <li>Impact of additional computation time on operational timings of the SDAC process</li> <li>Nomination deadlines: follow up of the ongoing discussions with MCSC and MPs</li> </ul>	Mario Pession (SDAC OPSCOM Convenor)  François-Xavier Detraz (TSO SDAC QARM Convenor)	
		- Second auction process reconsideration	Pierre Milon (MCCG Convenor)	
10:10 – 11:40	1h 30 min	<ul> <li>SDAC 15 min Market Time Unit (MTU)</li> <li>Project timeline</li> <li>Recap on the decision on product mix</li> <li>Description of 30' and 60' products</li> <li>60' curves vs. 15' blocks</li> <li>Feedback from Market Participants on limitations of blocks</li> </ul>	Adèle Roy & François-Xavier Detraz (SDAC QARM Convenors) Timo Suhonen (SDAC MSD Convenor)  Hélène Robaye (MCCG MPs Convenor)	
11:40 – 12:00	20 min	MCSC Status update on the prioritization exercise until 2026 and beyond	André Estermann, Cosimo Campidoglio, Ondřej Máca (MCSC Chairs)	
12:00 – 13:00	60 min	LUNCH BREAK		

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### Agenda – afternoon session

AGENDA			
TIME	DURATION	AFTERNOON SESSION	PRESENTER
13:00 – 13:20	20 min	<ul> <li>SIDC 15 min Market Time Unit (MTU)</li> <li>Map of time resolutions in Europe in SIDC continuous as well as future SIDC IDAs</li> <li>Update with the 2025 outlook regarding the 15' MTU switch in intraday continuous, incl. legal deadlines and derogations</li> <li>Overview on the transition to 15' interconnector OTU in SIDC</li> </ul>	Martim Stilwell (SIDC OPSCOM Chair)
13:20 – 14:20	60 min	<ul> <li>SIDC Intraday Auctions (IDAs)</li> <li>Progress of IDAs project &amp; Members testing planning</li> <li>Overview on offered capacity types by TSOs for IDA1, IDA2 and IDA 3</li> <li>Summary of IDA operational timings</li> <li>Heads up to the IDA Pre-launch event at the end of March 2024</li> </ul>	Jean-Michel Reghem & Vladimír Satek (SIDC QARM Convenors) Thomas Van Den Broucke (MCCG Convenor Lara Visone & David Myška (SIDC MSD Convenors) Kata Fehér & Emma Vila I Lopez de Recalde (Com TF Convenors)
14:20 – 14:30	10 min	COFFEE BREAK	
14:30 – 14:50	20 min	<ul> <li>Updates on methodologies' updates and consultations</li> <li>SDAC Product methodology update – Open public consultation</li> <li>Algorithm methodology – Publication of public consultation results on Co-optimisation</li> </ul>	Christoforos Zoumas (NEMO Tech TF Convenor)
14:50 – 15:05	15 min	<ul> <li>Stakeholder engagement approach</li> <li>Update of the improvements made and foreseen in 2024 (follow up of discussion last MCCG)</li> </ul>	Thomas Van Den Broucke & Pierre Milon (MCCG Convenors)
15:05 – 15:25	20 min	AOB – Co-optimisation R&D update	Timo Suhonen (SDAC MSD Convenor)
15:25 – 15:55	30 min	AOB for Market Parties – optional	Hélène Robaye (MCCG MPs Convenor)
15:55 – 16:00	5 min	Closure	Hélène Robaye, Thomas Van Den Broucke, Pierre Milon (MCCG Convenors)



#### Welcome by co-convenors of MCCG

The MCCG is led by three Co-Convenors:

#### Market participants co-convenor:

Hélène Robaye, Head of Regulation and Market Design, Eurelectric - ENGIE

#### TSO co-convenor:

Thomas Van Den Broucke, European Market & Offshore, ELIA

#### NEMO co-convenor:

Pierre Milon, Executive Expert Market Coupling & Integration, EPEX SPOT

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#### MoM & review of action points



MoM of previous MCCG were available on NEMO committee Link & Entso-e website Link

#### Overview of action points of the last MCCG:

No	Date	Responsible	Description	Deadline / Status
1	20/10/2023	NEMOs	Consultation on second auction in SDAC	Closed
2	20/10/2023	NEMOs	Map when market participants will be notified of IDA 1 cancellation	MCCG #5
3	20/10/2023	NEMOs	Written clarification of block usage for both 15min MTU implementation and IDAs	Q1 2024
4	20/10/2023	NEMOs	Written explanation about the new impact on the 60min curves, in case of multi-time resolution setup, increased likelihood of 60-minute curves being rejected due to the interaction between the averaging rule applied by the algorithm and the presence of price caps in SDAC	
5	20/10/2023	TSOs	Updated nomination map and calls with market participants associations	Q1 2024/ongoing
6	20/10/2023	NEMOs	Enhanced webpage on aggregated curves, block execution status	November 2023 /Completed



Mario Pession (SDAC OPSCOM Convenor), François-Xavier Detraz (SDAC QARM Convenor), Pierre Milon (MCCG Convenor)





#### Summary

- Single Day-Ahead Market Coupling timings will be slightly impacted by 15 min MTU and this will be visible from Market parties' perspective.
- Since MCCG 20th Oct 2023, both NEMOs and TSOs have put efforts into optimizing the computation time and the subsequent sub-processes to minimise the shift of the Publication time of the results.
- As a positive result, time available for Market parties for providing different nominations to TSOs might remain almost the same as it is today: Shift of the final results publication is envisioned only for 3 minutes instead of 13 minutes envisaged in the design presented in 2023. Shift of the preliminary results publication is envisioned for 6 minutes. This has not been agreed yet nor tested, NEMOs and TSOs are working on this proposal.

- Goal is to impact the operational and nomination timings as little as possible and to share the burden between involved parties.
- Nomination deadlines will not change.
- Final technical proposal for optimization of operational timings will be approved by NEMOs & TSOs in an MCSC meeting subject to successful testing, also providing insights into operational processes with 15minMTU.



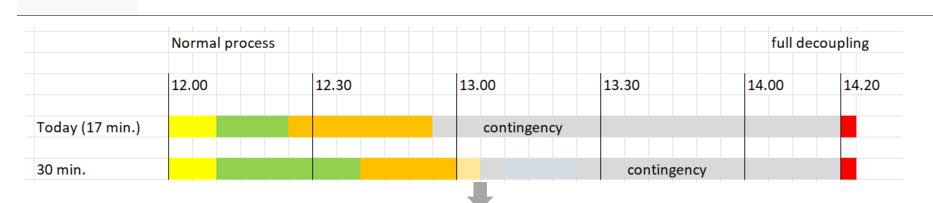
# Market Coupling Steering Committee

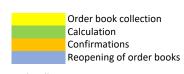
#### **SDAC Operational timings**

# Impact of additional computation time on operational timings of the SDAC process: Daily operational process given 30 min computation time (I/II)

## Topic description & background

Currently, the time dedicated to the SDAC process is **12.00 - 14.20**. 12.00 is the order book gate closure and is written in CACM. 14.20 is the full decoupling deadline and is derived from the deadline for nomination, which is set at 15.30 in several countries. Time from 14.20 to 15.30 is the time dedicated to the actions after full decoupling to respect the 15.30 deadline. **With an extension in the calculation, contingency time is reduced. Extension of calculation time to 30 min requires finding additional 13 min in the daily operational process.** 





h cell	n cell is 5

	17' calculation time	30' calculation time
Preliminary results publication	12h45	12h51
Publication of Final Results	12h58	13h01

- SDAC OPSCOM analysis has resulted in a proposal to shorten confirmation steps by NEMO (gaining 5-6 minutes) and by TSO/MPs (gaining 3 minutes). The final results publication deadline is foreseen to be 13:01.
- With the shortening of the confirmation steps (and more complicated results due to 15' MTU), ICs and delays in publication will probably be more frequent.
- The proposal is not agreed yet: It will be tested with various possible scenarios, e.g., multiple MTUs, etc. Based on the test results, the final timings will be adapted.





# Impact of additional computation time on operational timings of the SDAC process: Daily operational process given 30 min computation time (II/II)

#### 2025 SDAC operational timings for 30 min computation time:

	Current timings	2025 timings	
	12:00	12:00	NEMO Order book Gate Closure Time
	12:10	12:10	PMB GCT // Reception of all Order Data files in PMBs à Start of Calculation
	12:27	12:40	End of Calculation
Coupling	12:45	12:51	Publication of Preliminary Results and sending to the TSOs
	12:58	13:01	Publication of Final Results => Start of Notification Process
	13:50	13:50	Deadline to send the message for Risk of Full Decoupling
	14:20	14:20	Deadline to declare the SDAC Full Decoupling or Publication of coupled Results

- MCSC TSOs do not envisage to change nominations deadlines.
- The analysis on partial decoupling deadline is being conducted by SDAC OPSCOM.
- MCSC expects Market Parties to confirm the envisaged 2025 extended operational timings, granting 30' calculation time to the algorithm.





#### Nomination deadlines: follow up of the ongoing discussions with MCSC and MPs

#### **Background**

• This slide deck provides an overview on the different nomination deadlines for local (hub) and cross border nominations of all TSOs in SDAC. During the MCCG on 20/10, an initial version of this slide deck was presented, as further discussed in alignments with MPs. The version here presented now also includes the postponed deadlines in case of late publication of the SDAC results and several corrections.

#### **Approved MCSC TSO standpoint**

- The (local) nomination deadline of <u>14:30h</u> can<u>not</u> be moved (e.g., due to subsequent processes to prepare Operations in Day-Ahead timeframe). However, the Netherlands and Belgium are making steps towards moving their local nomination deadline from 14:00 to <u>14:30</u>.
- Overall, all parties (TSO, NEMOs and Market Parties) will have to optimise their processes as to accommodate the required implementation of 15min MTU.
- An overview of the different nomination deadlines in normal day scenario according to the concerned expected file (Local, cross-border, or Generation deadlines) is available in the annex.
- In the next slides, the case of late delivery with two possible scenarios for delayed nomination deadlines are explained. Be aware that the different nomination deadlines described, with late delivery or not are the one in operation today, and will not be updated in the context of 15 min MTU, due to the subsequent processes in preparing the Operations in Day-Ahead.

- SDAC nomination deadlines will remain unchanged by TSOs in the 15 min MTU context.
- One exception, two countries are making steps forward for moving later their local nomination deadline from 14h00 to 14h30.





Nomination deadlines: follow up of the ongoing discussions with MCSC and MPs

Local nomination deadline – results publication time >13:05

20' after SDAC results

30' after SDAC results

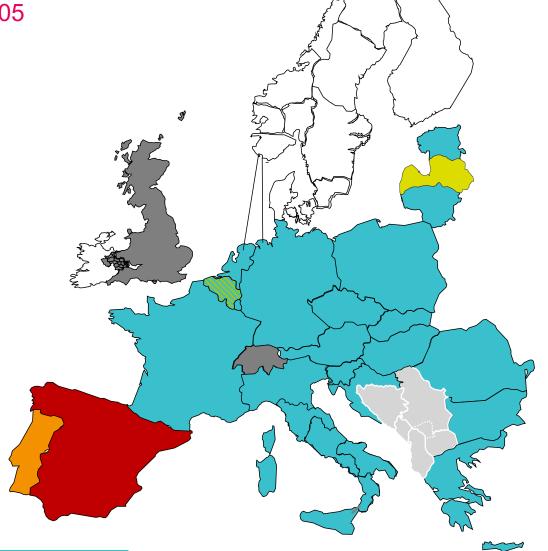
14:00

14:15

14:30

□ N/a

\*For Belgium: 14:15; with 14:30 second gate for correction



<sup>\*</sup>Litgrid legal deadline 14:30

# MCSC

Market Spylling Steering Committee

**SDAC Operational timings** 

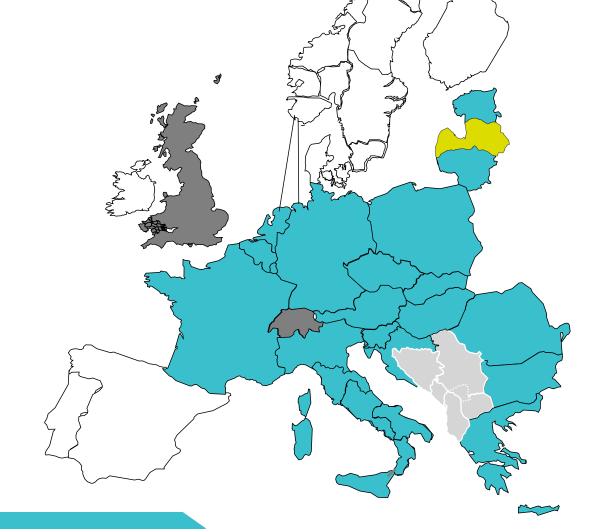
Nomination deadlines: follow up of the ongoing discussions with MCSC and MPs

Cross-border nomination deadline – results publication time >13:05

14:00

14:30

Ш N/а





Nomination deadlines: follow up of the ongoing discussions with MCSC and MPs &

Local nomination deadline – results publication time >13:50

20' after SDAC results

30' after SDAC results

14:30

14:45

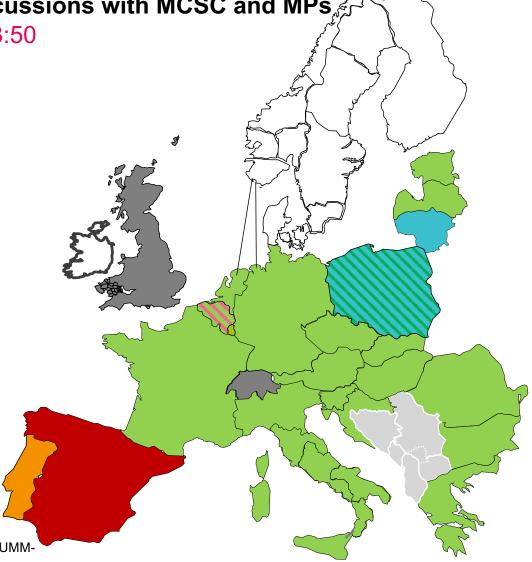
15:00

15:30

16:00

N/a
\*For Belgium: 14:45; with 15:00 second gate for correction

\*For Poland: The Polish hub nomination deadline is not postponed in case of receiving UMM-06b and UMM-06c due to specific local nomination backup held under PL MNA.



# Market Coupling Steering Committee

**SDAC Operational timings** 

Nomination deadlines: follow up of the ongoing discussions with MCSC and MPs

Cross-Border nomination deadline – results publication time >13:50

14:30

15:00

N/a





Nomination deadlines: follow up of the ongoing discussions with MCSC and MPs

Local hub nomination deadline – results publication time >14:20

20' after SDAC results

30' after SDAC results

14:30

15:00

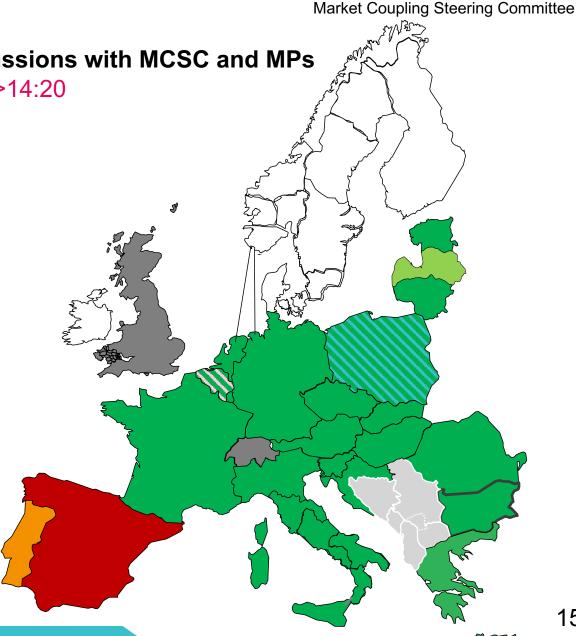
15:15

15:30

16:00

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\*\*For Belgium: 15:15; with 15:30 second gate for correction



<sup>\*\*\*</sup> Litgrid legal deadline 14:30 after it TSO have possibilities to set it BRP schedule

# **MCSC**

Market Coupling Steering Committee

**SDAC Operational timings** 

Nomination deadlines: follow up of the ongoing discussions with MCSC and MPs

Cross-Border nomination deadline – results publication time >14:20

14:30

15:00

15:30

16:00

└ N/a





#### Second auction process reconsideration

#### **Background**

- Following the assessment of the efficiency of the second auction process in terms of price formation as well as the associated operational risks, NEMOs opened on 24/11/2023 a public consultation with the intention to raise awareness on the possibility to remove the second auction process.
- The consultation ended on 15/01/2024.

#### Way forward

- NEMOs will publish the public summary of the answers to frequent questions received through this consultation shortly after MCCG.
- In order to ensure a good understanding of the issues, additional explanatory note will also elaborate on the coverage by individual and joint-NEMOs processes of potential bidding mistakes made by market participants.
   NEMOs call for an adequacy between experienced issues and solutions.
- NEMOs will take a decision later in H1 2024, for an entry into force at a later stage, depending on the local decisions.

- Second auction process is under reconsideration.
- NEMOs will publish public summary of the consultation as well as explanatory note shortly after MCCG.
- Decision to be taken in H1 2024 for an entry into force at a later stage.





François-Xavier Detraz & Adèle Roy (SDAC QARM Convenors), Timo Suhonen & Marja Eronen (SDAC MSD Convenors), Pierre Millon & Hélène Robaye (MCCG Convenors)





#### **Project timeline**

- Dedicated testing/project group has created a preliminary planning for testing and implementation for the go live of 15 min MTU in SDAC.
- The planning aims to take into account the most recent information on resource constraints and dependencies from other timeframes and European as well as relevant regional projects.
- Member testing is a part of the planning for which further info will be provided in the next MCCG session. No testing with market participants will be proposed in H1 2024 (similar to other implementation projects).

- The dedicated SDAC 15 min MTU testing/project group is refining the implementation planning. The execution of the planning is heavily dependent on local and regional projects.
- In the next MCCG end of Q2 2024, more information on the member testing and other go-live preparations will be provided.





#### Recap on the decision on product mix

- During 2023, MCSC made the two key decisions, answering request from market participants:
  - Calculation time was confirmed to 30'.
  - The product offering was confirmed to include 15', 30' and 60' product time resolutions.
- Key difference compared to current production offering
  - PUN in Italy shall be removed as 1. 1. 2025 from market coupling calculation.
  - Complex Orders in Iberian Peninsula shall be replaced with Scalable Complex Orders.
    - Scalable Complex Orders are already in use in Ireland.
- The 4-year R&D work with the Euphemia algorithm enables us to support 15' Market Time Unit with possibility to trade also with 30' and 60' MTUs and to allow the use of block orders at the current level.

#### **Summary**:

• Excluding the calculation time extension and the changes in Italy and Iberian peninsula, the market continues to function as today.





#### Description of 30' and 60' products

- Market Participants can use freely all MTUs from the ISP of the BZ up to 60' (depending on the individual NEMOs).
- Block orders can be used as today with any of the available Market Time Units.
- Each bidding zone has only one formal clearing price calculated on 15' resolution (except Ireland 30').
- Aligned with CACM regulation, the price continues to be noted as €/MWh.
- As the market has a price with single max/min prices, the price cap management is not changed.
  - The same price cap is used for all market time units.
- There is no change in any of the acceptance criteria/process for any of the curve/block orders.

#### The key delta between DA and IDA

- IDA has a single MTU for each bidding zone; bidding zones may have different MTUs from each other.
- SDAC central algorithm supports multiple MTUs for each bidding zone.

- There are no restrictions on usage of the different market time units.
- Prices are calculated in €/MWh.





#### 60' curves vs. 15' blocks

- Price cap is the same for all available market time resolutions.
  - Reminder: prices are €/MWh regardless of the used MTU.
- The 15' blocks can start and stop at any quarter of an hour.
  - 10:15 12:30 is a valid block order with 9 periods of 15' each.
- Paradoxical rejection of the coarser MTU curve orders:
  - When the price needed to guarantee the financial balance for CCPs cannot be reached because of price cap (= maximum price), the collected payment can exceed the payments to supplier (leading into extra money paradox).
  - To avoid extra money, the acceptance of orders with coarser resolution are adjusted. This may cause the curve submitted at coarser resolution to become (partially) paradoxically rejected.
    - One of the reason for paradoxical rejection is low liquidity on ISP/15min time resolution.
  - There is no priority between the curves and block orders, but naturally curves are more flexible, blocks more prone to rejection.

- 15' block orders can start and stop at any quarter of an hour.
- The coarser MTU curve orders may be (partially) paradoxically rejected.



# Market Coupling Steering Committee

#### MPs' feedback on limitations of blocks

- NEMOs jointly test a central configuration gathering anticipated usage of product by individual NEMOs. They individually determine the number of blocks they will be able to propose to their market participants.
- The total and individual number of blocks are evolutive and subject a robust change control procedure applied to all MCSC TSOs and NEMOs. The central algorithm is validated against any anticipated change of usage of a given product within a pre-defined limit.
- So far, NEMOs managed to avoid the application of any corrective measures towards market participants, by investing joint with TSOs in enhanced software and hardware performance. The CACM annual report from the NEMOs already contain the historical as well as anticipated usage of products.
- The discussion should be taken from market participants towards their NEMO(s). However, it would be beneficial to get a centralized feedback from market participants as part of the MCCG activities.
- MCCG will come back about market guidance for the 15'MTU context in the future MCCG meetings.

#### Market parties' questions:

- Is it then correct that there is no limitation on the number of blocks imposed by the central governance? Is it up to each NEMO to determine them?
- Could you explain how these limits are determined by NEMOs? What is preventing to extend them?
- How would you suggest to discuss the issues related to the switch from 24 to 96 time bucket and the impact on the limits? Should we bring this to each NEMO?
   We can explain more in detail why we perceive this as an issue of course.

- NEMOs determine the number of blocks they wish to provide to their market participants.
- MCSC TSOs and NEMOs validate the central algorithm against strict criteria and following a robust change management process.



# Market Participants feedback on block limitations in the 15min MTU SDAC implementation

Market Coupling Consultative Group 26 February 2024





## **Pending questions on products**

1. Is the future 30' and 60' subject to partial acceptance such as the current 60'?

- 2. Granularity and features of blocks in particular smart blocks:
  - What are the underlying features of the smart blocks? How do they change compared to today?
  - Will it be possible to link 15', and/or 30', and/or 60'? Or is it mandatory to link 15'?
  - Could NEMO provide a term sheet describing the products and/or rules? (so MPs can adapt their optimization tools). We recommend to include this description within Euphemia's public description.





## **Smart block order limits – need for appropriate products**

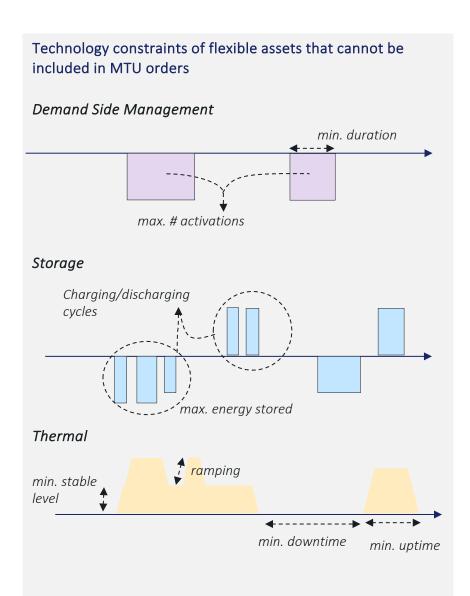
The change to 15' MTU can only improve welfare if it provides the right products:

➤ If Market Participants cannot specify their portfolio flexibility at this 15' granularity because of the lack/scarcity of appropriate products, then there is a risk that economic benefits of the reform vanish.

Due to technology characteristics, most flexible assets have only conditional flexibility:

- Using 15' MTU order exacerbates the risk that the cleared volumes are not technically feasible (e.g., due to ramp rates), re-increasing the need for (risky) intraday adjustments (in contradiction with reform's objective).
- Only smart block products (linked blocks, exclusive group, flexible blocks,...) can today ensure the respect of those technical constraints while providing the flexibility to the algorithm.

For those assets, increasing the time granularity (from 24 to 96 MTU) mathematically implies an exponential increase in combinations of possible production/ consumption schedules.



# **Examples of exponential increase in combinations**



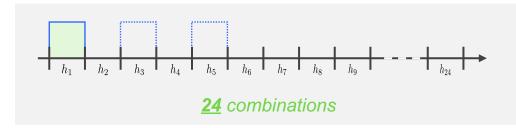


# **Demand Side Management:** moving to 15' MTU leads to exponential increase in combinations of activation possibilities

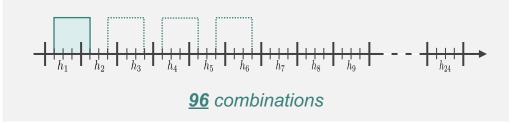




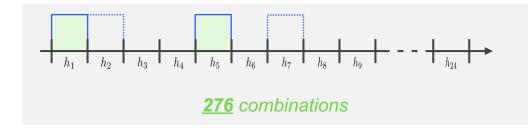
#### One activation



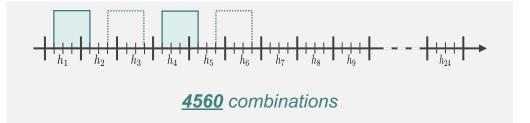




#### 2-activations







#### 3-activations

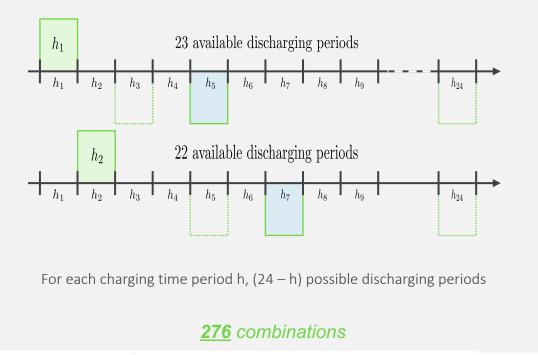


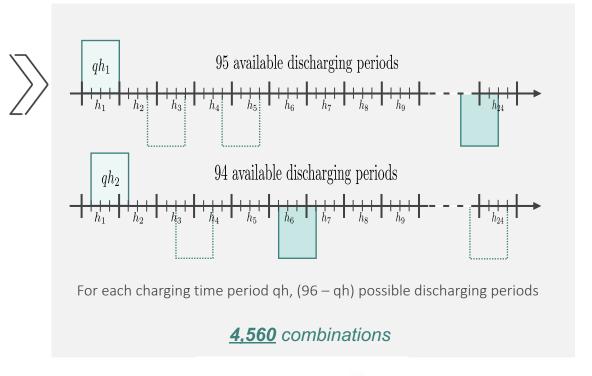
# **Storage:** moving to 15' MTU leads to exponential increase in combinations of charging/discharging possibilities





#### One charging/discharging cycle of one hour





Several charging/discharging cycles of one hour

For each case, the bids could potentially be splitted into different hours as in the previous slide.

→ Compound effects further increasing the multiplication of combinations when going to 15' MTU





### **Smart block orders – need for limit increase**

Changing Market Time Unit from 1 hour to 15 min requires increasing the bidding periods from 24 (1h MTU) to 96 (15min MTU)



This necessarily requires the appropriate products to specify the flexibility at this granularity meaning an increase in the number of smart block orders. This is a condition to the successful usage of 15' MTU which would otherwise suffer from an insufficient liquidity and may suffer from a limited usage from MPs, thus limiting the benefits expected from the reform.



But, for now, no increase in smart block orders limits (quantities) is foreseen.

- > It is urgent to provide precise specificities on the future products.
- The reform should incorporate a substantial increase on the availability of smart block orders and foresee new products enabling flexibility to be properly represented.
- > It is also necessary to harmonize the availability and the limits of smart block orders between PXs.
  - Limits are there to help the algorithm if some have different limits between PXs, the impacts will be unequal on the MPs of different PXs.



# MCSC Status update on the prioritization exercise until 2026 and beyond

André Estermann, Cosimo Campidoglio, Ondřej Máca (MCSC Co-chairs)



#### MCSC Status update on the prioritization exercise until 2026 and beyond

#### **Background**

- The aim of the prioritisation process proposal, as discussed among ACER, NRAs, NEMOs, TSOs, and MPs, is to establish a regulatory procedure to secure streamlined implementation of deliverables and projects to minimise delays in implementation.
- Prioritisation exercise shall be carried out by ACER & NRAs based on the inputs from projects, market parties etc.
- Role of MCSC: MCSC NEMOs and TSOs to provide inputs to the prioritisation exercise based on ACER/NRA request.
- Role of alignments with MPs/in MCCG: Important tool for ensuring that the prioritisation will bring realistic outcomes based on (coordinated) inputs from MPs/NEMOs/TSOs.

#### Outcome of the kick-off telco with ACER on 19/01/2024

- Prioritization shall apply essentially for years 2026 and 2027.
- In principle, all NCs shall be in the scope. In practice, the focus will be initially limited to CACM.
- EMD features 30 min IDCZGCT will be considered in the MCSC planning while the concrete timeline is not yet available.
- Both R&D and Implementation shall be in the scope.
- Currently, **EnC** and **Assets Release** are the main projects, RIPs to update on their expected evolution.
- Descoping of projects is also possible, in case ACER's scoring proves negative.

#### Challenges

- Need to gather stakeholders' input to secure the final scoring representative of the market view
- Need for an early involvement of NEMOs & TSOs in impact/welfare assessment, ahead of the regulatory approval
- Need to clarify treatment of MRLVC

#### **Summary**

• Prioritisation exercise shall work with clearly defined scope of projects allowing for streamlined long-term planning based on ACER input.

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## **Market Coupling Consultative Group meeting**

### **LUNCH BREAK**

26 February 2024



## Agenda – afternoon session

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## SIDC continuous 15 min Market Time Unit (MTU)

Jaime Ponz García Comendador & Martim Stilwell (SIDC OPSCOM Co-chairs)



#### **SIDC ID 15'MTU implementation**



Within SIDC OPSCOM, an analysis was done as to readiness of all parties / borders for the 15'MTU switching Based on the information provided, the following preliminary conclusions can be drawn

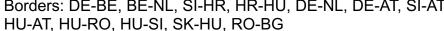
- Readiness: Today -> assumed switch at IDA Go-Live or already at 15'MTU
  - Live: DE-BE, BE-NL, SI-HR, HR-HU, DE-NL, DE-AT, SI-AT, HU-AT, HU-RO, HU-SI, SK-HU, RO-BG
- Readiness: IDA Go-Live / 1st of July 2024 -> switching date as this is aligned with respective NRAs
  - CZ-DE, SK-CZ, CZ-AT
- Expected go-live Q3 / Q4 2024
  - LV-LT, EE-LV, DK1-NL
- Expected go-live End 2024 / early 2025
  - FR-BE, FR-ES, NO1-NO2, NO1-NO3, NO1-NO5, NO1-SE3, NO2-NO5, NO3-NO4, NO3-NO5, NO3-SE2, NO4-SE1, NO4-SE2, IT-CP-FR, IT-CP-SI, IT-GR-GR, IT internal borders, DE-FR, DK1-NO2, DK1-SE3, DK2-SE4, FI-SE1, FI-SE3, DE-DK2, DE-PL, SK-PL, DE-DK1, DE-NO2, CZ-PL, LT-PL, PL-SE4, DK1-DK2, NO2-NL, SE1-SE2, SE2-SE3, SE3-SE4, LT-SE4, IT-CP-AT, GR-BG, ES-MA, ES-PT, EE-FI



# **SIDC ID 15'MTU implementation**

Readiness: Today

Borders: DE-BE, BE-NL, SI-HR, HR-HU, DE-NL, DE-AT, SI-AT,





Border on 15 min MTU

Border on 30 min MTU

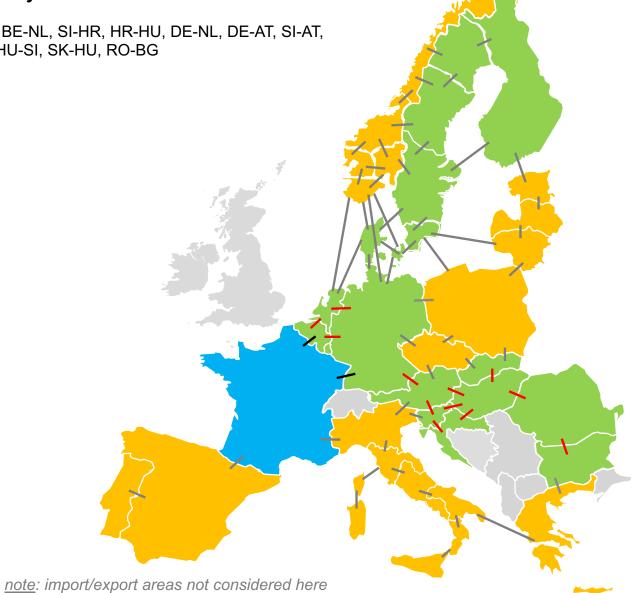
Border on 60 min MTU

BZ on 15 min MTU

BZ on 30 min MTU

BZ on 60 min MTU

Not part of SIDC coupling





# **SIDC ID 15'MTU implementation**

Readiness: IDA Go-Live / 1st July 2024 (working assumption)

Borders: DE-BE, BE-NL, SI-HR, HR-HU, DE-NL, DE-AT, SI-AT, HU-AT, HU-RO, HU-SI, SK-HU, RO-BG + CZ-DE, SK-CZ, CZ-AT



Border on 15 min MTU

Border on 30 min MTU

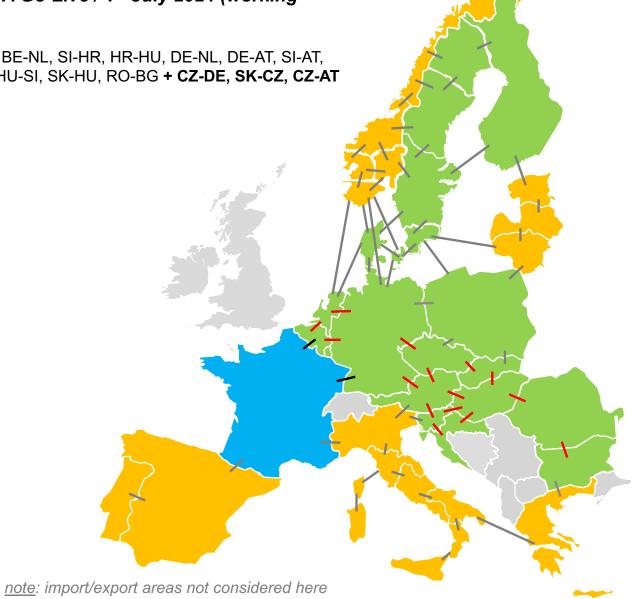
Border on 60 min MTU

BZ on 15 min MTU

BZ on 30 min MTU

BZ on 60 min MTU

Not part of SIDC coupling





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# **SIDC ID 15'MTU implementation**

Readiness Q3 / Q4 2024 (working assumption)

Borders: DE-BE, BE-NL, SI-HR, HR-HU, DE-NL, DE-AT, SI-AT, HU-AT, HU-RO, HU-SI, SK-HU, RO-BG, CZ-DE, SK-CZ, CZ-AT

+ LV-LT, EE-LV, DK1-NL



Border on 15 min MTU

Border on 30 min MTU

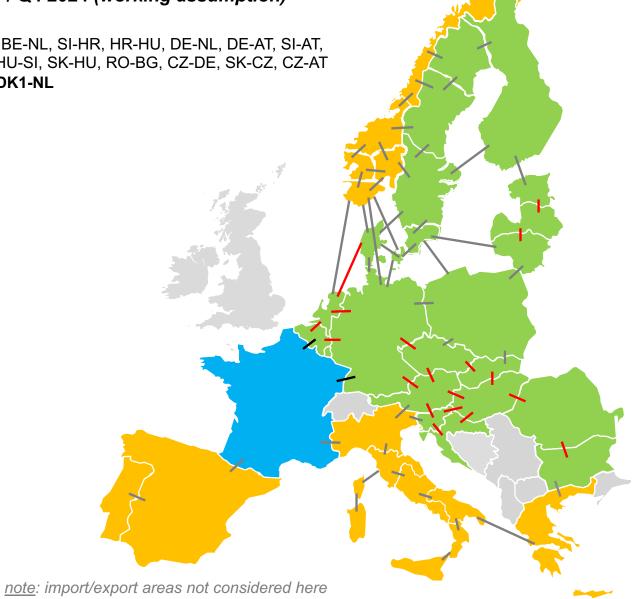
Border on 60 min MTU

BZ on 15 min MTU

BZ on 30 min MTU

BZ on 60 min MTU

Not part of SIDC coupling

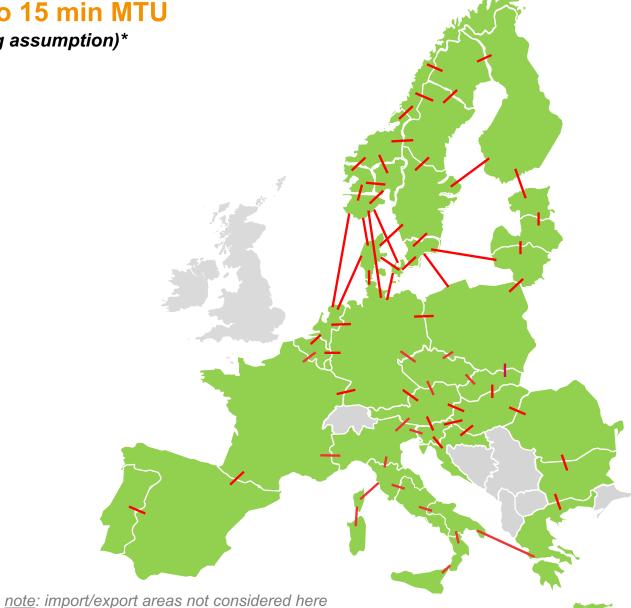






2025 (working assumption)\*

All borders





Border on 15 min MTU

BZ on 15 min MTU Not part of SIDC coupling



<sup>\*</sup> Transfer to status presented in this figure may happen in several steps where individual BZs and Borders will switch to 15 min MTU

# **SIDC 15 min Operating Time Unit (OTU)**



## Overview on the transition to 15' interconnector OTU in SIDC

- Difference between MTU and OTU with a basic explanation of OTU for transparency
  - What is OTU: Operating Time Unit ("OTU") is a parameter controlled by the TSOs, specific to the XBID Capacity Management Module
    - o OTU set to 60min means that XBID CMM close the trading every 60 minutes, resulting in 24 nomination gates
    - o OTU set to 30min means that XBID CMM close the trading every 30 minutes, resulting in 48 nomination gates
    - o OTU set to 15min means that XBID CMM close the trading every 15 minutes, resulting in 96 nomination gates

### How does it impact MPs:

- If MTU of the interconnector is 15min and OTU is 60min, XBID will close for trading 4 MTU periods on the interconnector in the same time, every hour (24 gates)
- o If MTU of the interconnector is 15min and OTU is 15min, XBID will close for trading 1 MTU period of 15min every 15min (96 gates)
- OTU setting has an impact on what products / contracts can be traded cross border: It defines the moments gates of contracts are closing (cross-border).
- By Jan 2025, it is expected that the majority of borders will be on 15 min OTU.

## **Summary**:

OTU setting impacts the market participants because it defines the cross-border closure time of the contracts.

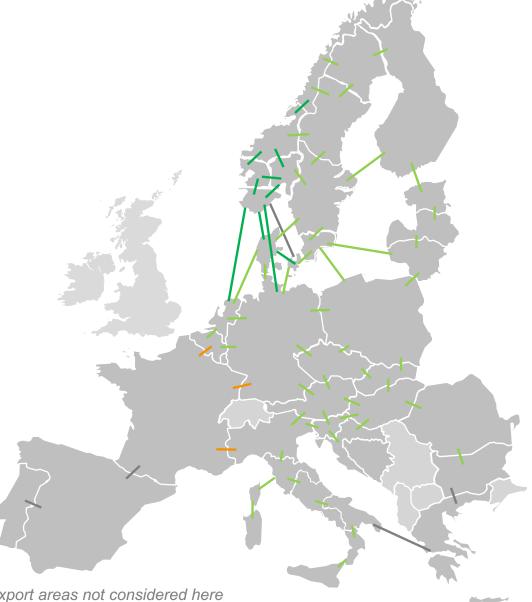


# **ID Border on 15 min OTU vs MTU**

Working assumption



- 15' OTU before 15' MTU on Border
- 15' OTU at the same time as 15' MTU on Border
- 15' OTU after MTU 15' MTU on Border
- \_\_\_ N/A







Jean-Michel Reghem & Vladimír Satek (SIDC QARM Convenors)

Thomas Van Den Broucke (MCCG Convenor)

David Myška & Lara Visone (SIDC MSD Convenors)

Kata Fehér & Emma Vila I Lopez de Recalde (Com TF Convenors)





# **Progress of IDAs project & Members testing planning**

### **IDA tests progress since last MCCG:**

- All test in **XBID R4.0** (IDA changes in XBID) completed with exception of IDA performance tests related to the point in time when continuous cross border trading is reopened after IDAs (expected high market activity).
- IDA Connectivity tests were finalized.
- **IDA Functional Integration Tests (FITs)** Majority of the scenarios are completed including resolution of majority of issues. For some parties, there is outstanding finalization (by end of March) of the development related to nomination and matching which leads to the needs of additional testing.
  - Statistics on issues: (Total # of issues/findings: 179, # of open issues/findings 26).
  - Readiness of post coupling processes has improved substantially since mid-December.
- **IDA Simulation Integration Tests (SITs)** Since January, a technical issue linked with the transition from one environment to another has led to repeated failure in normal SIT processes. The SIT phase focused on procedural testing is behind the plan, creating a need for additional time needed for testing, therefore creating a risk of testing timeline extension.
- **IDA settlement of congestion income** It was agreed to have Core and Nordics borders ready by the end of SIT tests (March 15th), with the exception of Hansa borders. Regarding IBWT, SWE, BG-RO and PL-LT borders, an interim solution is being discussed between TSOs, NEMOs and JAO to be in place by IDA Go Live until the target solution is ready (planned for September 2024).

- Testing of some scenarios needs to be repeated due to ongoing local development in the post coupling processing.
- Implementation of IDA settlement of congestion income (target or interim solution) is ongoing but completed by TSOs.





## **Progress of IDAs project & Members testing planning**

### Ongoing & future activities:

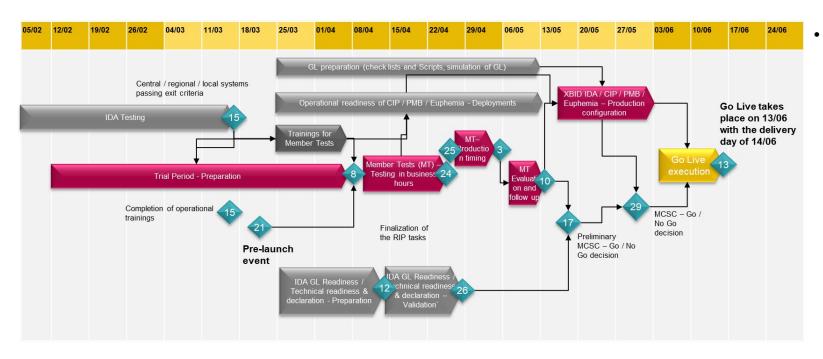
- Execution of 6<sup>th</sup> (final) run of FIT Phase 2 It focuses on the support of retesting of post-coupling processes. On top of pending post-coupling processes on some borders, there are fixes to non-critical issues to be tested, as well as one CR dealing with the rounding of allocations. Additionally, the IDA extended full chain scenario (combining post coupling of Day ahead with all 3 IDAs) is subject of execution in late March / early April.
- **IDA SIT Testing** Timeline for finalizing SIT testing and mitigation measures to be put in place are worked on.
- **IDA go-live** Basic organizational steps are agreed upon with the continuation of detailed fine-tuning (go-live configuration and go-live deployments, validation of go-live technical and non-technical aspects (so-called declaration of technical readiness), the readiness of the operational aspects, etc.).
- Trial Period / Pre-Launch event Planning is completed; preparation of materials is ongoing. This phase will only start when SIT is completed.
- MPLS / CIP failover tests Implementation of the secure communication infrastructure between 1) central systems (XBID and Common Interface Point (CIP)) and 2) CIP and NEMOs is ongoing. Also, CIP failover tests are subject of finalization.

- IDA Simulation Integration Tests pose a risk to the project timeline.
- Final project phases such as IDA Go Live process and Trial Period Process are ongoing.





# **Members testing planning**



- Member tests are expected to take place for 4 weeks starting on April the 8th with two different timing arrangements:
  - Office hour timing: 08-12/04, 15-19/04 and 22-24/04
    - IDA3: 09:00
  - IDA1: 14:00
  - IDA2: 16:00
  - Production like timing: 25-26/04 and 29/4-03/05
    - IDA3: 10:00
    - IDA1: 15:00
    - IDA2: 22:00

- Two approaches on the timing to support needs of all SIDC regions.
- Market parties will be able to participate in the member testing via the NEMO platforms.





# **Members testing planning**

Scenario expected to be executed in Member testing	Expected result of the scenario for the market participants			
	IDA session is started as agreed time	IDA session is competed at agreed time	IDA results provided - (traded volumes & prices)	X-border continuous trading on hold during IDA session
Normal day	Yes	Yes	Yes	Yes
Cancellation in advance of IDA 1 due to SDAC issues	No	N/A	N/A	No
Cancellation of IDA in advance - Unavailability of XBID	No	N/A	N/A	No
TSOs not able to validate IDA Results (XBID down)	Yes	Yes	No	Yes
<ul> <li>Missing Order Books at Orderbook Gate Closure Time - Partial decoupling</li> </ul>	Yes	Yes	Limited (PT, ES, IT, GR)	Yes
Partial decoupling in advance	Yes	Yes	Yes, with exception of decupled bidding zones	Yes
<ul> <li>No IDA Global Final Confirmation (GFC) by deadline due to issue with CIP or PMB - manual opening (GFC received after deadline in PMB)</li> </ul>	Yes	Yes	Yes	Yes
Negative GFC (XBID to revert allocations)	Yes	Yes	No	Yes

- Wide range of scenarios are foreseen to be run (repeatedly) during member testing focused on the overall chain with the emphasis on the coupling phase.
- More details on the member testing of IDAs will be provided during the IDA Pre-launch event.





## Overview on offered capacity types by TSOs for IDA1, IDA2 and IDA 3

### **Introduction**

- MCSC TSOs previously provided an overview of the CZCs for each IDA [LINK].
- Below, an intermediate update is provided per CCR with links to the EXT // RUN where available:

#### SWE:

- SWE TSOs have agreed to prepare hourly information of NTC and DA flows for a two-period month in order to be used for the SIT test capacity data.
- Further information on the IDA CZCs will be provided in the full update.

#### **Nordics:**

- Nordic TSOs have provided the 'realistic' IDA capacities. The ATCE-data from the Nordic DA FB //Run can be obtained via the following link [LINK].
- It is noted that 'realistic IDA1 capacities' means that ATCE capacity changes almost hour to hour. Therefore, it is important to test the correct day for the right ATCE data. Nordic TSOs can provide current NTC-capacities that are stable for testing purposes. However, it should be stressed that these will not be 'realistic values' once Nordic DA FB goes live.

#### **Baltics and Hansa**

- Baltic and Hansa TSOs prepared capacity data for IDA1 based on production representing at 2 months (July August 2023) period.
- Further information on the IDA CZCs will be provided in the full update.

#### Core

- Update Core is subject to ACER approval, expected by March 2024.
- Results of IDCC(a) and IDCC(b) parallel runs could be consulted on JAO Publication tool [LINK].
- More information will be provided during Core CG March 12 and subsequently during the IDA pre-launch event.

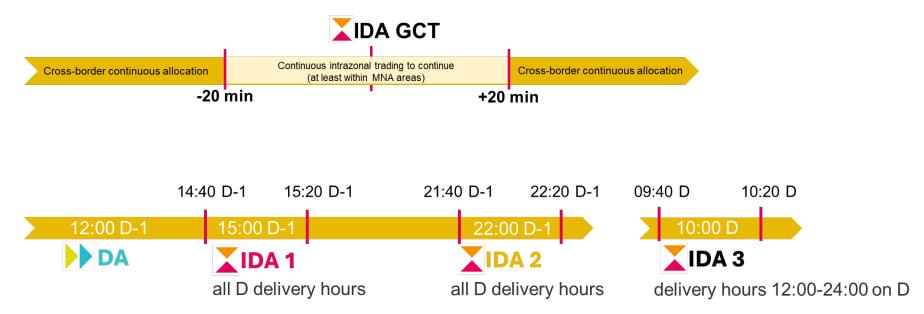
A full update on IDA CZCs will be provided for the IDA pre-launch event.





# **Summary of IDA operational timings**

Regular process



## **Summary**:

Continuous cross-border allocation should be interrupted under regular operation for 40 minutes.





# **Summary of IDA operational timings**

## Process irregularities

- DA results are not known by 14:10 D-1.
  - o IDA1 session will be cancelled. Corresponding message will be sent by SIDC via instruction defined in procedures.
- IDA results are not delivered by the prescribed time for validation (GCT+27).
  - o IDA session will be cancelled.
- Cross-border continuous allocation interruption shall not exceed GCT+30.
- Partial (de)coupling:
  - In case of issues experienced by a NEMO, the NEMO is decoupled and other NEMOs will be either automatically decoupled together with it or stay in the session, depending on configuration the expected configuration is that GME, OMIE and HENEX stay coupled. The configuration reflects the impossibility, due to the short time available in IDA, of re-opening the OBKs (common practice that gives Market Participants the possibility to adjust their bids due to the unexpected changes of market topology).
  - o For IDA go-live the decoupled borders are kept closed in XBID CMM until the end of IDA auction, i.e., no continuous cross-border allocation, but this feature is foreseen to be modified later (in 2025) allowing to resume continuous cross-border allocation for decoupled borders earlier.

## **Summary**:

Market Participants will be informed on IDA cancellation.





# **Summary of IDA operational timings**

Regular process - details Before IDA the IDC cross-border trading can be IDC publishing of updated ATCs and cross During IDA the IDC cross-border trading can be halted no more halted no more than 20 minutes than 20 minutes under normal operation border trading opening no later than T+20 under normal operation **NEMOs** Joint final **XBID Halt** preliminary Gate Validation on continuous validation Closure Publication of cross-border Publication\* of Time the Final IDA allocation preliminary IDA Results results **Publication** of Capacity CZC to market submission parties deadline Order Book **Preliminary** Network data creation and validation preparation Calculation submission process by TSOs T+20 T-15 T-5 T+17,5 T0 T+13 T+6 T-20 GCT IDA1 = 15:00 Delivery D+1 GCT IDA2 = 22:00 Delivery D+1 \*Publication of preliminary GCT IDA3 = 10:00 Delivery D results only where applicable All timings are in CET/CEST Reopening of cross border trading on XBID Continuous cross-zonal allocation of Latest moment when network data can be updated/delivered based on ATC (capacity leftovers from IDAs) no capacity in XBID halted for relevant MTUs later than T+20 under normal operation to NEMOs (in extraordinary case)

## Summary:

■ IDA process timing addresses various challenges and high automation should secure process robustness.





# Heads up to the IDA Pre-launch event at the end of March 2024





The **agenda** is available on the NEMO Committee and ENTSO-E websites:

- ENTSO-E [LINK]
- NEMO Committee [LINK]



The **registration** is possible via the following [LINK]



The **information package** is available on the NEMO Committee and ENTSO-E websites:

- ENTSO-E [LINK]
- NEMO Committee [LINK]





# Updates on methodologies' updates and consultations

Christoforos Zoumas (NEMO Tech TF Convenor)





# Updates on methodologies' updates and consultations:

**SDAC Product methodology update – Open public consultation** 

- Public consultation pursuant to Art. 12 of Commission Regulation (EU) 1222/2015.
- Legal grounds for consulting: Any amendment of CACM TCMs needs to be submitted for public consultation for at least one month (pursuant to art 12 of CACM) to consider stakeholder's views on this reviewed proposal.
- Amendments proposals on latest relevant <u>ACER Decision 37/2020</u> (Annex-I).
- Consultation period: 5/2/2024 4/3/2024 and results are expected by mid-April 2024.
  - Link @ <u>NEMO Committee Website</u> with Explanatory Note and amendment proposals.
- NEMOs have already performed a biennial public consultation in early 2023 for the same reason.

# Triggers for this amendment proposals:

- Activation of 15min MTU products in SDAC via big-bang approach in 2025. Relevant to removal of certain types of optional Order Types (like PUN) and incorporation of Cross Product Matching rules.
- Clarifications, rephrasing, naming conventions: Numerous improvements for clarifying products usage, order types description, and naming conventions.





# Updates on methodologies' updates and consultations:

# Algorithm methodology – Publication of public consultation results on Co-optimisation

- Public consultation on AM update for Co-optimisation and IDAs launched on 31st July 2023. Ended on 25th September 2023.
- Public Consultation results/feedback was <u>published at the NEMO Committee website by 24/11/2023</u>.
- NEMOs proposal submitted to ACER on 24/11/2023.
- ACER already launched <u>a Public Consultation from 18/01-15/02/2024</u> to collect the views of stakeholders.
- <u>Public workshop of ACER with stakeholders held on 01/02</u> for discussing the main elements of the public consultation (the expected benefits of co-optimisation, further research needed, design of bids and specific products).
- Decision from ACER on the methodology is expected by May 2024.
- NEMOs and TSOs are currently cooperating on defining the content and scheduling of the R&D activities for 2024 for the definition of the Bidding Guide structure and bid-linking options.



# Stakeholder engagement approach

Pierre Milon and Thomas Van Den Broucke (MCCG Convenors)



# Stakeholder engagement approach: Update of the improvements made and foreseen in 2024 (follow up of discussion last MCCG)

### Background and steps taken to far

- MCCG forum was introduced in 2022, and since then, MCCG convenors alignments defined the agenda items to be discussed.
- During MCCG #4 a discussion to further enhance the cooperation took place.

### In November 2023, MCSC decided to increase and improve the engagement with market participants as from 2024 by:

- Organizing at least 3 MCCG sessions per year for which dates should be timely agreed upon,
- Organizing additional dedicated technical session related to dedicated projects (e.g., IDA pre-launch go live event, 15' MTU SDAC, ...) meetings/calls,
- Introducing technical content discussions to the MCCG session,
- Facilitating and encouraging market parties MCCG representatives to bring content/agenda topics themselves towards the MCCG session,
- Improving the MCCG workshop IT tools to allow for more interactive sessions, as requested by participants in previous MCCG workshops,
- Having the ambition to align on and, if possible, define joint positions between NEMOs, TSOs and market participants for MESC meetings,
- Aiming to streamline on content and input between MCCG and regional stakeholder engagement to MPs,
- Improving the preparation and publication of MCCG material (session files, MoM of sessions, MCSC agenda topics, ...).

Following the implementation in 2024 of the enhanced cooperation between NEMOs, TSOs, and market participants, Terms of References will be updated.

## Summary:

- MCCG stakeholder engagement will further improve and increase as from 2024.
- Market Participants' MCCG representatives are welcome to also bring and present content to MCCG sessions.
- NEMOs and TSOs will propose slightly amended Terms of References governing MCCG.

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# **AOB**



## Co-optimization R&D update

- The scoping of the R&D prototype is ongoing.
- The primary focus is to build a prototype that can be used for the impact assessment (performance and market KPI impact).

## **Interaction with market participants**

- NEMOs and TSOs intend to use MCCG framework to have a dedicated session focused on the bid linking option(s) proposal (with the possibility of individual feedback provision). This approach could be beneficial / needed for the market participants as bid linking mechanisms should be defined as part of the R&D work.
  - Proposed timeline: Early April (input for the R&D starting in Q2 2024)

## **Next steps include:**

- Development kick off in the beginning of April
- Mid-term alignment with N-Side at the end of June
- Final R&D report at the end of September
- Reporting to ACER in October

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# **Closing remarks**



# **Closing remarks, further information**

The minutes of the meeting will be available on the NEMO Committee and ENTSO-E website. The links will be sent out via email.

The next meeting will be scheduled in June 2024, details & date will be shared soon.

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# 5th MARKET COUPLING CONSULTATIVE GROUP WORKSHOP

# THANK YOU FOR YOUR PARTICIPATION

**26 FEBRUARY 2024** 



# Annex: Nomination deadlines in normal day scenario according to the concerned expected file



# Market Cowling Steering Committee

**SDAC Operational timings** 

Nomination deadlines: follow up of the ongoing discussions with MCSC and MPs

Local hub nomination deadline – Normal Day Scenario

20' after SDAC results

30' after SDAC results

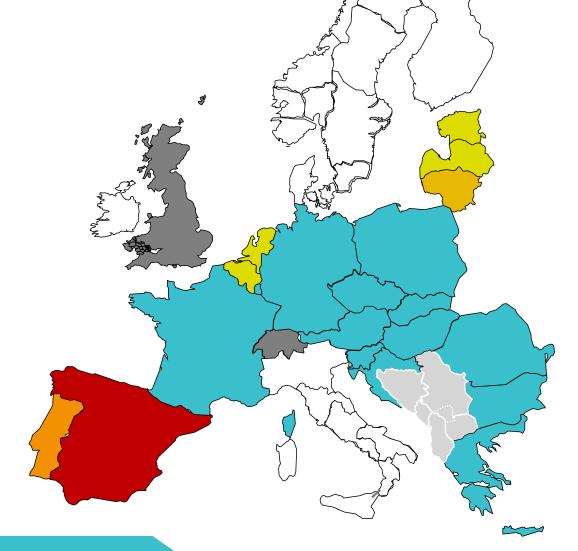
13:30

14:00

14:30

15:30

N/a



# **SDAC Operational timings**

Nomination deadlines: follow up of the ongoing discussions with MCSC and MPs

Cross-Border nomination deadline – Normal day scenario

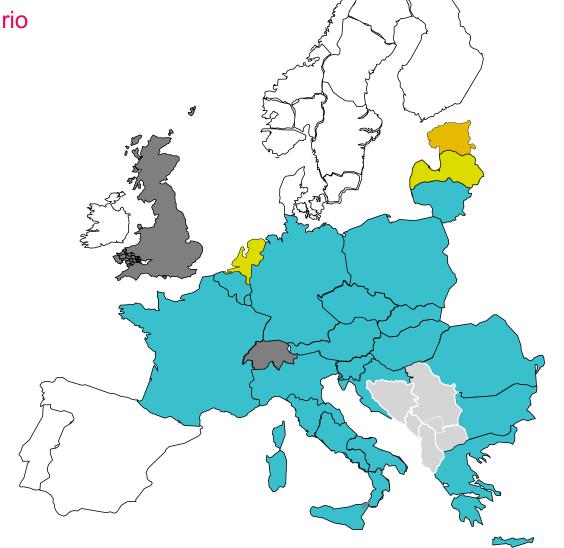
13:00

13:50

14:00

14:30

N/a



Market Francisco Steering Committee

# Market Counting Steering Committee

# **SDAC Operational timings**

Nomination deadlines: follow up of the ongoing discussions with MCSC and MPs

Generation schedules deadline – Normal Day scenario

No information available at time of writing

20' after SDAC results

14:00

14:30

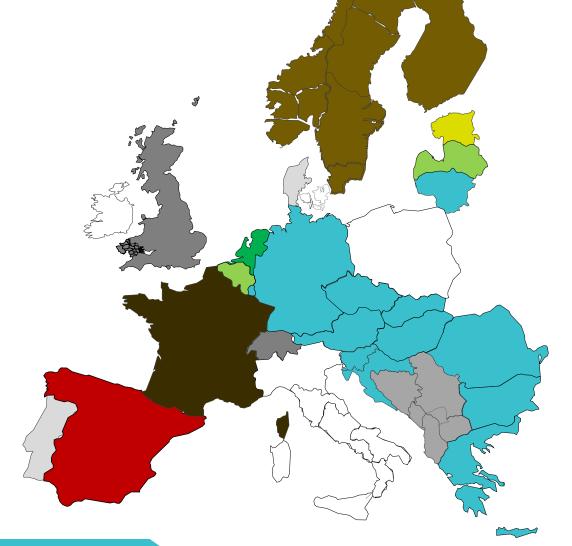
15:00

15:30

16:00

16:30

N/a





Annex: Status on implementation of 15' MTU in ID continuous and IDA, particularly the implementation of 15' cross-zonal MTU and on the Operational Time Unit (OTU)





# 15' in ID continuous: implementation of 15min cross-zonal MTU and market area 15min MTU Regulatory Deadlines regarding 15 MTU implementation

As for Day-ahead, there is 2 kind of MTU (Market Time Unit): the MTU of the market area (bidding zone) and the MTU of the interconnectors.

- All SIDC Bidding zones must have 15 min MTU (15 min XBID products proposed to market participants). This local Market Area MTU should be equal to the Imbalance Settlement Period (ISP) as per Art. 8.2 of the CEP (Electricity Regulation (EU) 2019/943). In addition EBGL requires 15min ISP by 1st January 2025.
- Cross-border resolution of 15 min MTU– also called "contract resolution" in XBID of the interconnectors must be also set to 15min as soon as the MTU of the 2 area on both side of the interconnectors is also to 15min, as per definition of Intraday MTU (from IDCZCP methodology (Decision ACER of 26/04/2018) and ACER clarification letter send to IDSC on 6/2/2019: "Intraday market time unit (MTU): obligation for TSOs to offer cross-zonal capacities for the SIDC with the maximum of the two imbalance settlement periods (ISP) on each bidding zone border."
- Process agreed by some TSOs and regulators:
  - Dividing the process in 2 phases that don't have to take place simultaneously is valid:
    - Phase 1. Implementation 15 Min MTU within BZ. Dependent on NEMO, TSO and regulators.
    - Phase 2. Implementation 15 min MTU on the borders. Dependent on TSOs on both side of the borders.
    - Both Phases should take place by 01st January 2025
      - → pre-requisite for 15min transition on the same interconnector in Day-ahead: DA AAC (already allocated capacities) varying every 15min could be send to XBID CMM for intraday only if the MTU resolution of the border is also in 15min





# 15' in ID continuous: implementation of 15min cross-zonal MTU and market area 15min MTU Clarification on Operating Time Unit (OTU)

Operating Time Unit ("OTU") is a parameter specific to XBID Intraday platform.

OTU set to 60min means that XBID CMM close the trading every 60 minutes, resulting in 24 nomination gates

OTU set to 30min means that XBID CMM close the trading every 30 minutes, resulting in 48 nomination gates

OTU set to 15min means that XBID CMM close the trading every 15 minutes, resulting in 96 nomination gates

OTU is different of the resolution / MTU of the borders but is linked.

If MTU of the interconnector is 60min and OTU is 60min, XBID will close for trading 1 MTU of 60min every hour (24 gates)

→ common situation before 15min MTU transition

If MTU of the interconnector is 15min and OTU is 60min, XBID will close for trading 4 MTU periods on the interconnector in the same time, every hour (24 gates)

If MTU of the interconnector is 15min and OTU is 15min, XBID will close for trading 1 MTU period of 15min every 15min (96 gates)

OTU does not impact the resolution of the borders nor the product that could cross the borders ... however it could impact the neutralization time before the delivery of the MTU periods.



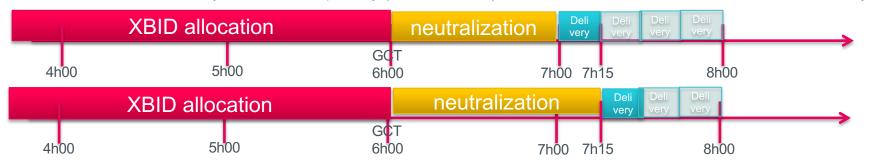


# 15' in ID continuous: implementation of 15min cross-zonal MTU and market area 15minMTU Market Coupling Steering Committee Clarification on Operating Time Unit (OTU)

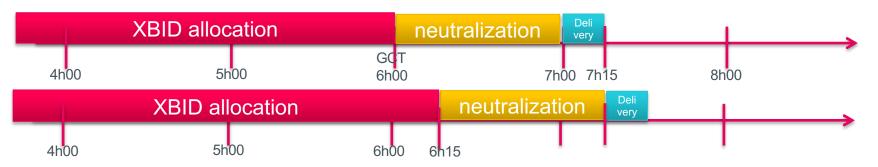
MTU 60min and OTU 60min → Gate closure every hour: 24 Gates per day



MTU 15'min and OTU 60min → Gate closure every 60': 24 Gates per day (4 values of 15') → "neutralization": 60, 75, 90 or 105' before delivery



MTU 15min and OTU 15min → Gate closure every 15': 96 Gates per day → neutralization always 60' before delivery







# 15' in ID continuous: implementation of 15min cross-zonal MTU and market area 15min MTU Regulatory deadlines linked to Operating Time Unit (OTU)

• → IDCZGOT and GCT methodology approved by ACER in April 2018

The IDCZGCT for all other bidding zone (except EE-FI) shall be 60 minutes before the start of the relevant intraday MTU on a bidding zone border. Until 1 January 2021, the IDCZGCT may be applied in relation to the relevant delivery hour rather than in relation to the relevant ID MTU

- Paradox:
- With 60' MTU on the border, IDCZGCT is always 60' before the start of the MTU, with the current 24 gates scheme.
- With 15' MTU and 24 gates, each gate closes 4 MTUs, with only the 1st MTU having an IDCZGCT 60' before the
  delivery
- → IDCZGOT and GCT methodology requests then to have also a switch to 96 gates (OTU 15min) when the border is moved to 15' MTU
- → Moving to 96 gates is however a challenge for TSOs



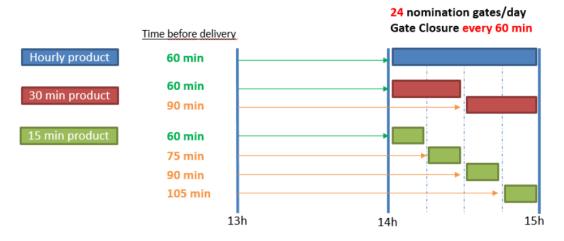


# 15' in ID continuous: implementation of 15min cross-zonal MTU and market area 15min MTU Challenges linked to the implementation of 15min Operating Time Unit (OTU)

### Example:

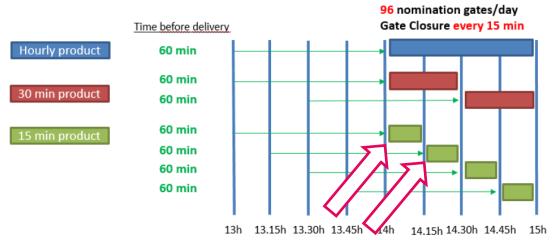
- BE-NL and BE-DE borders
  - Switch to 15min MTU on the borders in December 2020
  - Switch to 15min OTU on the borders only in April 2023

#### BE-NL and DE-BE borders since December 2020



With 24 gates, 15' MTU and 60' neutralization time, there is no overlap: both TSOs have 55' to solve the issues before the delivery

#### BE-NL and DE-BE borders after change to 96 gates



With 96 gates and 60' neutralization time, in case of issue there is still 55' to solve it.

But another gate will be closed 15' later, with potentially the same issue.

There is overlapping periods when we move to 96 gates





# 15' in ID continuous: implementation of 15min cross-zonal MTU and market area 15min MTU Challenges linked to the implementation of 15min Operating Time Unit (OTU)

- Manual operations used on a 24 gates should be automatized with 96 gates.
  - → Huge impact on TSO's operational process, operator trainings, procedures ...
  - → Huge impact on nomination tool (key component of scheduling of TSOs): new workflow, new UI screens ...
  - → Impact on bilateral matching process between TSOs (to be done 96x/day + automatization), different on each border: Automatic way to solve simple issues between TSOs should be implemented in order to avoid manual actions of operators in case of small connectivity issue Example: If connectivity is < 15min, the next matching process will fix the issue.
    - → TSO could then take the value of the other TSO if he is the only one to have communication issue Such automatization should be aligned and implemented by both TSOs.

On some borders, TSOs would prefer to split the migration of the border to 15min MTU with the transition to 96 gates:

- Scope reduction for the work to be implemented for 15min MTU XB transition
  - Less risks on the 1/1/2025 deadline
  - Less operational risks for the go live
- Other reasons: Example: TERRE platform is currently not compatible with 48 or 96 nomination gates. Reason why BE-FR have 30min MTU since December 2024 but OTU still 60 and not 30min.
  - → BE-FR will have 15min MTU by 1/1/2025
  - → OTU 15min/96 gates will be implemented in a second phase (2025/2026)





Annex: Updates on methodologies' updates and consultations - SDAC Product methodology update - Open public consultation





# Updates on methodologies' updates and consultations:

# **SDAC Product methodology update – Open public consultation**

- @ all Articles: Rephrasing/clarification improvements of existing content (terminology improvements, calendar vs delivery day, support for 15min and imbalance MTU etc).
- @ Article 3: Content relevant to the acceptance/rejection criteria of demand/supply curves due to the Cross Product Matching highlighting the cases of possible Paradoxically Rejected Curves, in case different market time unit are proposed in the SDAC by 2025.

## @ Article 5:

- Complex Block Orders: Improved the wording for the acceptance criteria of Linked Block Orders (parent/child welfare) and added explicit reference on possible combination of Linked Blocks and Exclusive Family Blocks (section for Complex Block Orders).
- Complex Orders (MIC/MP/Load Gradient and conditions for acceptance/rejection) have been re-written (although heading for being abandoned). Included also a reference for a fallback period of 6months for their SDAC algorithm support retention after the 15min MTU go-live.
- Scalable Complex Orders (MIC/MP/Load Gradient and conditions for acceptance/rejection) are now introduced with enhanced description matching EUPHEMIAs technical documentation.
- PUN Orders support period is clearly defined up to the go-live of the 15min MTU products in SDAC (Merit Orders are retained).
- @ Article 6: The activation of daily usage (commercial activation) of the 15min/30min (where relevant) provisions is linked to the go-live date of the 15min big-bang in SDAC.
- Also, included an Appendix listing the NEMOs for which SDAC Products Methodology applies for.

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