

Topic: Public consultation pursuant to Art. 12 of Commission Regulation (EU) 1222/2015

Questions

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- 4) When integrating HMMCP for Intraday Auctions, NEMOs propose to follow the same principles as for SDAC. This means a differentiation from HMMCP for the SIDC continuous. What is your view on that differentiation, and do you have a view on what maximum and minimum clearing price should be applied for SIDC IDAs and what mechanism for possible upward or downward adjustment of that maximum and minimum clearing price should be applied?
 - We don't mind the differentiation from HMMCP
 - In our opinion since we foresee that due to the change in MTU to 15 min and the increase of wind and solar production liquidity will move from DA to ID its necessary to use the same calculation and methodology for setting max and Min prices in ID as for DA. It should also be one extra amendment the price limits in a following market (such as ID after DA) would benefit from having a higher maximum price and a lower minimum price. We would also like to point out that this must be valid for FRR markets that follow the ID market.
- 5) The current methodologies describe a dynamic process to increase the maximum clearing price if market prices reach certain thresholds. NEMOs would like to consult on the possibility to also implement a decrease of the maximum clearing price after a period when no thresholds have been exceeded and the maximum clearing price shows to be unnecessarily high.
 - It could work without problems, but is it necessary? The maximum and minimum prices of the markets should always be high/low enough to never interfere with the market mechanism of setting the price. If a market solution cannot be reached (meaning getting a price clearing and not having production meeting the demand) isn't it better to have a fallback procedure, meaning that the marketplaces go back to the participants and ask them to redo their bidding.
- 6) NEMOs would like to consult on the duration of the transition period between detection of the threshold and entry into force of the new price cap. Shall this be shortened, increased, or maintained to be 5 weeks after the triggering threshold (60% of max clearing price) has been reached?
 - The changes to the price limits should be immediately set through, meaning that the change should be done for the next auction
- 7) Do you consider the current approach to increase the maximum clearing price in steps of EUR 1000,-- still adequate?
 - Good enough

- 8) Do you think that the event that the clearing price exceeds a value of 60 percent of the harmonised maximum clearing price for SDAC in one market time unit of a day in single bidding zone is a sufficient trigger to increase the harmonised maximum clearing price for SDAC? For example: to instead as the basis for triggering a maximum clearing price increase to be given by a requirement that the threshold has been exceeded on multiple different days (e.g. separate SDAC trading days) within a given period.
- Yes, but a change to 70% could be more suitable
- 9) HMMCP methodologies to describe also an automatic extension of the minimum clearing price when a certain threshold is reached?
- Minimum prices should be set in the same way as maximum prices
- 10) Any other views regarding the HMMCP methodologies for SDAC and SIDC?
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