

## Answers regarding Public consultation pursuant to Art. 12 of Commission Regulation (EU) 1222/2015 (hereinafter CACM Regulation) on Harmonized maximum and minimum clearing prices for single day-ahead coupling and for single intraday coupling

1. Name: Hendrik Hesse
2. Email: [hendrik.heese@mvv.de](mailto:hendrik.heese@mvv.de)
3. Organisation: MVV Trading
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?  
→ According to MVV's information, the idea of 15-minutes intraday auctions has been withdrawn by the TSO.
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.  
→ A stepwise decrease is a good corrective action. The appropriate criteria, which will lead to a decrease, need to be defined.  
→ Please start a further consultation regarding this subtopic.
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? → MVV agrees.
7. Do you consider the current approach to increase the maximum clearing price in steps of EUR 1000,- still adequate? → MVV agrees.
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.  
→ Why is the limit at 60 % of the threshold and not 100 %?  
→ If not only one hour in one market area, which criteria shall apply?
  - a. Count of exceeded limits?
  - b. How many days in a row/ altogether?
  - c. → Please start a further consultation regarding this subtopic.
9. HMMCP methodologies to describe also an automatic extension of the minimum clearing price when a certain threshold is reached?  
→ Would be logic. Question: When will we reach prices below -500 EUR/MWh?
10. Any other views regarding the HMMCP methodologies for SDAC and SIDC?