

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

15 July 2022

1. Name

[Benoît Grehaigne, Head of Short-term Trading and CCGT portfolio Management, TotalEnergies Electricité et Gaz France](#)

2. Email

benoit.grehaigne@totalenergies.fr

3. Organisation

[TotalEnergies](#)

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?

[In order to ensure coherence of prices at a same market timeframe \(for example, at Intraday timeframe\) and to avoid market distortions, HMMCP for Intraday Auctions and for SIDC continuous should be the same and with an identical adjustment methodology.](#)

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.

[We agree with the principle of a decrease of maximum clearing price when no thresholds have been exceeded and the maximum clearing price seems unnecessarily high during a certain period. The period should be sufficiently long to reflect structural market evolution \(for example, two years\). The criteria of a decrease should be properly consulted with the market participants.](#)

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?

Reactivity is key when conditions to a change in HMMCP are met (even if we consider that threshold should be exceeded several times before reviewing HMMCP – see answer below). Nonetheless, a minimum notice period is needed. Thus, we think that the transition period could be shortened at 2 weeks.

7. Do you consider the current approach to increase the maximum clearing price in steps of EUR 1000,-- still adequate?

Steps of 1000€ could appear excessives. We suggest increases more progressive by having steps of 500€.

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.

We agree that having an increase of the HMMCP - when the threshold is triggered once - is excessive and not needed. Indeed, a very unlikely and exceptional market event would automatically cause an increase whereas it doesn't reflect a structural market evolution. On this point, we are aligned with the CRE's observations provided in its report published on 8 July about the price spike on 4 April 2022.

Therefore, we support that before HMMCP increase, the threshold should be exceeded on different days (for instance, 5 days) whatever the bidding zone and only when the threshold has been reached due to stress on the Power system (for example, IT issues or operational bidding errors should be excluded). In addition, we are in favor of raising the 60% threshold, for example up to 80%.

9. HMMCP methodologies to describe also an automatic extension of the minimum clearing price when a certain threshold is reached?

We are in favor of an automatic extension of the minimum clearing price on the same principles of the maximum clearing price.

10. Any other views regarding the HMMCP methodologies for SDAC and SIDC?

NA