

## Online workshop for Public Consultation on SDAC Product Methodology amendments proposals by NEMOs

28<sup>th</sup> May 2026

Q&A document

**Date/Place:** 28<sup>th</sup> May 2026, 11:00 – 12:00 CET, MS Teams Webinar

**Presenters:** Chiara Vitelli and Christoforos Zoumas, NEMO Committee Technical Task Force Co-leaders

**Attended participants:** 42

**Meeting presentation:** [link](#)

**Q1:** *Could the list of mandatory products be extended in the future to linked bids and exclusive bids with investments in Euphemia?*

**A1:** The concept of mandatory and optional products is coming not from the capacity of the algorithm to support specific order types but from the legal requirements of products used. Of course, the algorithm can support all the order types which are available (and scalable to the provisioned usage ranges). According to the CACM Regulation, the minimum kind of orders provided are: (a) orders linked to a single MTU, and (b) orders linking multiple MTUs. To this extent, we consider the simplest order types that could be available to provide this kind of a legal requirement. There are the Curve Orders and the Simple Block Orders which are provided for a single MTU, or for linking multiple MTUs. All the order types which are included, and especially the complex order types like Linked Families or Exclusive Groups, which are currently under the optional framework, they are always defined and always pre-tested for each of the NEMO trading hubs with specific product usages, envisaged product usages and actual product usages under historical data and future expansion forecasts.

Currently, we are using this framework on the optional and mandatory products and order types. We need at the end to keep a balance between the products which are being provided and are focusing on having at least the minimum requirements of the Algorithm Methodology and the CACM Regulation but also have some kind of flexibility when we will need possibly to apply corrective measures. We were always trying under short, mid-term or even forward-term R&D to improve Euphemia and extend the capacity of the Algorithm, but currently we cannot guarantee that we can include the kind of optional

products which are providing already and by evidence more complexity to the algorithm to mandatory products.

**Q2: *If the methodology is changed so that 30' and 60' period orders are optional, not mandatory, does this mean NEMOs will remove them and market participants would not be able to use them any more?***

**A2:** This is not the case. The 30' and 60' products are supported by the Algorithm, the relevant Period Orders are also supported by the Algorithm. What the option will finally be is that these products and these order types, which are now being used for 30 and 60 minutes, the Period Orders, will be classified as optional and will be candidates for possible application of corrective measures. At the end, as already stated, applying corrective measures with this kind of products and order types will provide minimum or zero performance improvement.

As said, we are of the opinion that this distinction among mandatory and optional makes sense in light of possible application of corrective measures. The Algorithm Methodology already provides the selection rules and priority when deciding on possible Corrective Measures (parameters, optional products/order types and finally mandatory orders/product types) as the algorithm must support at least the basic products/order types directly linked with the legal requirements in the CACM Regulation.

In case we have any problem of algorithm performance, then, algo parameters and more complex products like Linked Families, Exclusive Groups or even TSOs constraints for ramping have already been identified as possible candidates of Corrective Measures with measurable performance improvement. Specifying the current mandatory Period Orders (the curve order with 30' and 60' duration) as the optional products/order types would not give any leverage in order to help the algorithm to converge.

Instead, we see a counterintuitive effect: if these Period Orders are converted to optional, and be removed under remedy for corrective measures, then Simple Block Orders (still being a mandatory offering) linking different 15' MTUs will be used most likely in place of the removed Period Orders. So, instead of improving the algorithm performance we will end up increasing Simple Block Orders usage and face increased complexity. For this reason, we do not recommend moving the Period Orders to the optional section of the SDAC Products Methodology.