

Public Consultation: SDAC Products Methodology Review

Market Participant & Stakeholder Questionnaire

This questionnaire is designed for Market Participants (MPs) and stakeholders to provide feedback on the **SDAC Products Methodology** analysis conducted by NEMOs for the period of October 2025 to February 2026 for the Usage of SDAC Products and Order Types. In alignment with the analysis, the focus is on validating the NEMO's proposal to maintain the current methodology without amendments.

Please select the most appropriate response for each of the following items.

1. Based on your current operational needs, do you agree that the existing suite of SDAC products (Mandatory and Optional) continues to meet the requirements of the market post-15' MTU go-live?

- ☐ Strongly Agree
- ☒ Agree
- ☐ Neutral
- ☐ Disagree
- ☐ Strongly Disagree

2. NEMOs analysis suggests that 60' Period Orders still account for a significant share of volumes and price steps in several countries. Do you agree that the 60' Period Orders should remain part of the "Mandatory Products" listed in the SDAC PM?

- ☒ Yes
- ☐ No
- ☐ Undecided

3. Do you agree with the NEMOs' assessment that removing 60' Period Orders would likely lead to an increase in Block Orders, potentially degrading algorithm performance?

- ☒ Yes, the risk is high that removing 60' Period Orders will lead to replacement with numerous Block Orders.
- ☐ No, I believe 60' Period Orders will be replaced only with a very limited number of Block Orders.
- ☐ Neutral / Not enough information.

4. Do you agree with the NEMOs' assessment that classifying 60' Period Orders as an optional offering would have detrimental performance gains in the case of being selected as a possible Corrective Measure?

- ☐ Yes, the gain under a possible CM is considered detrimental.
- ☒ Yes, the gain under a possible CM is considered detrimental and a possible substitution by Balock Orders could increase the complexity of the SDAC Algorithm.
- ☐ No, I believe the algorithm could handle the shift.
- ☐ Neutral / Not enough information.

5. How critical is the Minimum Acceptance Ratio (MAR) parameter in Block Orders for your asset scheduling and operational stability?

- ☐ Essential (Cannot bid effectively without it)
- ☒ Useful
- ☐ Not very important
- ☐ Not used in my bidding strategy

6. Do you agree with the NEMOs' proposal to keep the MAR parameter to prevent the fragmentation of the order book into many smaller Block Orders?

- ☒ Yes
- ☐ No
- ☐ No opinion

7. Simulation results showed that converting 60'/30' Block Orders into 15' equivalents did not improve significantly algorithm performance (TTFS). Do you agree that 60' granularity for Block Orders should be maintained?

- ☒ Yes, maintain 60' granularity for Block Orders.
- ☐ No, move toward 15' standardization only.
- ☐ Undecided.

8. Do you agree that the existing Corrective Measures (CMs) and optional product types provide sufficient tools for NEMOs to restore algorithm performance without reclassifying products?

- ☒ Yes
- ☐ No
- ☐ I believe more restrictive measures are needed.

9. NEMOs propose no amendments to the current SDAC Products Methodology at this time. Do you support this approach keeping the current status of the SDAC PM products and Order Types?

- ☐ Yes, I support the proposal.
- ☒ No, I believe specific amendments are required.
- ☐ Neutral.

10. Please provide any other feedback to be considered under the NEMOs evaluation for their relevant proposal to ACER/NRAs for SDAC PM. In particular, it would be helpful for NEMOs to understand the importance of 60' Period Orders to your organization and your level of readiness to transition away from them, if required.

As for question 9, we would like to specify that even if the present suite and product classification is overall in line with our bidding necessity, we still identify the need for the introduction of specific order that support storage offers. To this end, we suggest including *loop blocks* orders as mandatory ones within the Product Methodology (in Italy, where we are active, they are not present), at least until the new storage orders become operative. We will also provide dedicated feedback when responding to the NEMOs Consultation launched on the specific topic of storage orders on SDAC.

On the matter at hand, we would like to stress the necessity of maintaining 60' period orders. Indeed, we agree with NEMOs conclusion that their elimination from the Products Methodology suite would lead to a significant shift towards 15' products orders, but consequently, this would result in more frequent non-smooth profiles for market participants, which in some cases could be not feasible for the underlying assets. This is particularly the case for hydro plants that require continuity between adjacent MTUs. Without 60' period orders market participants would have to rely more on Block Orders, which could increase the complexity of the SDAC Algorithm, or on transactions in markets subsequent to SDAC (e.g. IDA and XBID) to adjust hydro plants programming to a less volatile profile. Thus, we recommend maintaining the 60' Products Orders as a mandatory product in the SDAC PM classification.