

# CONSULTATION RESPONSE



## NEMO Committee consultation on the single intraday (SIDC) products

Brussels, 28 June 2024 - Energy Traders Europe appreciates and welcomes the opportunity to provide comments regarding the NEMO Committee consultation on products that can be taken into account in SIDC.

### Key messages

The NEMOs are proposing minor changes to the existing products and a few amendments for the intraday auctions (IDAs) and the 15 minutes Market time Unit (MTU) products adoption.

It is important that:

- while there will only be 15 minutes products in the IDAs after the 15 minutes MTU go live, all current products (15/30/60min) should remain in XBID/SIDC after the go live of the 15 minutes MTU for intraday continuous.
- complex block orders in the intraday auctions (IDAs) such as linked, exclusives families become mandatory and not optional.

### Detailed comments

#### Article 7

We understand that the list and classification of products into mandatory and optional products is an ACER Decision. We still invite NEMOs, ACER and the NRAs to make the complex block orders in the intraday auctions (IDAs) such as linked, exclusives families mandatory and not optional. Therefore, we request art. 7.2.a on complex block orders optionality to be moved to art. 5 on mandatory product for intraday auctions. We observe that SIDC already incorporates block orders as well as a wide variety of "complex orders", from user-defined blocks and iceberg orders.

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NEMOs have gradually improved the performance of Euphemia in order to accommodate more complex products. We do not believe that linked or exclusive bids introduce such a degree of complexity in the algorithm that they deserve to be made optional. In our view, only a thorough demonstration of their negative impact on algorithm performance would have warranted their exclusion from the list of mandatory products.

## Contact

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