

Url consulta: [public-consultation-pursuant-to-art-12-of-commission-regulation](#)

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Mensaje :CEZ would like to raise few comments on the NEMO consultation on SDAC products. We appreciate the effort to give more clarity on products used in SDAC after 15 min MTU introduction (namely that the list of mandatory products for SDAC auction include hourly, half-hourly and quarter-hourly products). However, we regret that Complex Block Orders fall into the category of optional products. We consider the linked and exclusive products as priorities as they are necessary to correctly reflect technical capabilities and limitations of assets and portfolios in the day-ahead auctions. These benefits consumers as it allows for an efficient and competitive bidding process leading to an efficient dispatch. We strongly support the inclusion of such products under the list of mandatory products. Their availability should not be reduced or removed in any way in the event of corrective measures applied due to delays in publication. Furthermore, we are not fully in line with changes in the Article 3 regarding paradoxically rejected bids in a coarser MTU than the finest bidding zone MTU granularity. We also hope that our understanding that exclusive block orders are fully preserved and will be implemented with a 15 min MTU is correct. Furthermore, while those points are not directly subjects of the present public consultation, we would like to stress the importance of increasing the number of blocks and complex orders allowed per portfolio: the introduction of 15 min MTU mechanically implies an exponential increase in the number of combinations of potential production/consumption schedules, which consequently requires an increase of the current limits of complex orders that can be used for a given portfolio.