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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?

[we prefer the same cap prices for all auctions DA and Intraday.](#)

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](#)

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?

[5 weeks is ok](#)

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

[No, 1000 is too big](#)

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.

No, at least several hours on several days in a month

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

No, -500 is already huge

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

In this period of strong crisis, it is reasonable to stop the HMMCP process to avoid adding stress and anxiety on the electricity market which faces strong attacks at the moment (especially in France)...

Also, increasing quickly the cap price won't change anything regarding the offer/demand balance. There are absolutely no asset nor demand response that can run at 5000€ and not at 4000€. Putting the price up again would only put a kind of penalty on buyers without any benefit for the market.

We recommend to keep -500/4000 till the end of the crisis.