

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

Email: pierre.peureux@edf.fr

Mensaje :EDF welcomes the opportunity to give its opinion on the NEMOs proposal on the SDAC Products Methodology pursuant to their obligation under Article 40 of the CACM. Regarding article 3 of the methodology, EDF notes the NEMOs proposal clarifies that orders in the money submitted at the BZ MTU will be fully accepted. Reciprocally, orders submitted at a longer MTU may be paradoxically rejected. EDF would appreciate clarifications on how this rule interacts with the acceptance/rejection of complex orders and whether the chosen prioritization indeed reflects the optimal approach. EDF also wonders whether the full acceptance of 15 min block orders is preferable over the acceptance of fully divisible 30 min blocks. Regarding articles 4 and 5, EDF is aware that the introduction of 15 min MTU product in SDAC will lead to an increase in the computational complexity for the running of the price-coupling algorithm. Therefore, the content of the current list of SDAC products needs to evolve. The SDAC Products Methodology distinguishes two categories of products: one corresponding to the minimum legal requirements (e.g. mandatory products) and the second one representing other possible products that the algorithm should accommodate if possible (optional products). EDF welcomes and fully supports that the list of mandatory products for SDAC auction include hourly, half-hourly and quarter-hourly products. However, EDF regrets Complex Block Orders fall into the category of optional products. Indeed, EDF considers as priorities the linked, exclusive and loop blocks products. Complex products are necessary to correctly reflect technical capabilities and limitations of assets and portfolios in the day-ahead auctions which, in turn, benefits consumers as it allows for an efficient and competitive bidding process leading to an efficient dispatch. EDF thus strongly supports the inclusion of such products under the list of mandatory products. Furthermore, so far article 5.1.a of the methodology refers to article 4(2) which in turns refers to article 4(1). EDF underlines that the methodology should more clearly and directly indicate that the following combinations of complex orders and MTUs are possible: • products listed in Article 5 (Optional products for SDAC auction) are available for hourly, half-hourly and quarter-hourly products: e.g. two hourly SBOs can be linked in a parent-child relation. • the combination of SBO (Simple Block Orders) with different MTU is also possible: e.g. to link hourly SBO with a quarter-hourly or half-hourly SBO. In addition to the previous points, while those points are not directly subjects of the present public consultation, EDF would like to stress the importance of: 1. increasing the number of blocks and complex orders allowed per portfolio: indeed, 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. 2. clarifying the exact targeted deadline of the go-live of the 15' MTU. The legal deadline, set on the 1st of January 2025, poses many operational challenges (proximity with many designs operational still undisclosed, bank holiday, middle of the winter etc.). NEMOs have communicated so far on a go-live during the Q1 2025. EDF is in favor of a go-live after the winter season, toward the end of Q1.