

NEMO's consultation on Single Intraday Coupling (SIDC) products

A Eurelectric response consultation

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Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

[WG name]

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Eurelectric welcomes this new all NEMOs consultation on an amended methodology of products to be used in the single intraday coupling (SIDC), encompassing both the continuous trading and intra-day auctions (IDAs). The list of products to be used for SIDC indeed requires a balanced trade-off between, on the one hand, a growing complexity to be handled by the algorithms and, on the other hand, overall simplification, allowing to decrease computational time but altering the efficiency of the market to a large extent.

Eurelectric would like to recall that an important appreciation element of the products and services to be proposed is primarily whether they **accommodate market needs**. The increased computation complexity for the algorithm induced by the introduction of the 15 min Market Time Unit (MTU) should not lead to reducing the product offer and should enable a correct representation of assets on the market. Eurelectric therefore asks for the mandatory accommodation of (simple and complex) products by the Day-Ahead and IntraDay algorithms whenever traded in a sufficient number of Member States (at least 3) so that assets are correctly offered/priced on the markets.

Products definition should encompass **15, 30 and 60 minutes products and all complex products** already considered for the Single Day-Ahead Coupling (SDAC). Eurelectric considers that handling complex products, in particular block orders over multiple hours, is key for the efficiency of capacity allocation and pricing.

Decisions on products require adequate transparency and NEMOs are invited to share with market participants the assessments of the computational time of the algorithm when integrating all the complexity of the products together with the 15 minutes ISP as well as the analyses of the algorithms' performance (especially those leading to increase the run times or to prioritize developments). More generally considering the evolutions to come, Eurelectric does not support too speedy implementations without the insurance that SDAC and SIDC algorithms are able to handle products already admissible today, in particular linked, exclusive and loop block products.

Regarding article 3 on general requirement for SIDC, Eurelectric opposes paragraph 3 provisions, i.e. the "*usage and parameterization of any individual product is a decision of each individual NEMO*". If there is a common methodology to define mandatory products at EU level, there should be a harmonized implementation/interpretation of the rules across Europe. This addition should not be a means to abide the rules and enable the recent interpretation of the rules for SDAC products by some NEMOs.

Regarding article 5 on mandatory products and order types for IDAs, Eurelectric considers the amendments require clarifications. Should it be understood as only one of granularity will be available in a given zone at a given time?

Eurelectric also notes there are no references in the article to cross-product matching as expressed in the explanatory document. This reference should be included.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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