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## **RE: Proposal for modification of IDA (intraday auction algorithm) rules**

We appreciate the opportunity to provide our feedback on public consultation on SIDC products.

In 2022 Slovakia became part of SIDC market. SPP, as national renewable energy buyer, warmly welcomed this change to our market design. Increased liquidity on XBID market helps us to eliminate electricity imbalance created by higher volatility of renewable energy production.

Therefore, we would like to comment on upcoming changes of SIDC market design (ACER Decision 01-2019 - ACER Decision on the Methodology for pricing intraday cross-zonal capacity:

- We understand need of TSOs to set up model that will enable them to bring a price for cross-zonal capacities, based on IDA (intraday auction), however, we fear that this will decrease market liquidity on intraday market as we know it today.
- We suggest maintaining one IDA - 15:00 D-1. This will be similar to day ahead market model.
- IDA 22:00 D-1 is outside of common business hours and thus will increase personnel costs of companies. Moreover, this period is still too far away from hours of solar production where the certainty of solar forecast is too low, especially on days where weather is unstable.
- IDA 10:00 D - here we do not see any benefit in comparison with common intraday trading model on a day of delivery. Moreover, this period collides with period of day ahead planning process, that might increase time stress to accomplish all tasks.

We assume that implementation of IDAs across all market areas will be a step back to current SIDC model. We expect that lower liquidity on common intraday market will bring increased imbalance of renewables leading to increased need and higher prices of balancing energy.

Sincerely

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