

Consultation answer received on 24<sup>th</sup> March via NEMO Committee online form.

Email: [johannes.schulz@rwe.com](mailto:johannes.schulz@rwe.com)

*Note: Following text was formatted by NC Secretary for better readability.*

*Original answer:*



Nemo Committee  
Consultation's answ

We support the changes introduced in Article 4 regarding the SDAC and SIDC criteria. However, we note the absence of an analysis on the additional triggering metric for updating the maximum and minimum clearing prices based on market liquidity. Without such an analysis, the thresholds appear to be arbitrary rather than based on a technical metric.

Currently, intraday auctions suffer from a lack of liquidity, particularly for IDA2 and IDA3, and we anticipate this issue will extend to IDA1 over time. Setting a minimum threshold of 100MW cleared volume is too high and would likely prevent any future adjustments to the maximum price level.

Additionally, the time lag between reaching a price limit threshold and the implementation of the new price limit should be reduced from 28 days to one week. This change would enable the market framework to respond more swiftly to prolonged periods of very high or very low prices, while still allowing sufficient time for procedural adjustments by market participants and NEMOs.