Feedback received via online form on 12th June.

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Message :

EDF welcomes this NEMO consultation on the amendment to the Algorithm Methodology for timing adjustments to the Intraday Auctions (IDAs) due to the introduction of the Flow-based implementation.

As a preliminary remark, EDF reminds that according to the Electricity Regulation, intraday auctions remain an optional feature of the market design. Furthermore, EDF highlights that, in order to preserve the efficiency and liquidity of the single intraday coupling continuous trading (IDCT), the suspension of the cross-zonal capacity allocation within the IDCT before and after the deadline for bid submissions (Gate Closure Time, GCT) of each IDA shall be maintained as short as possible.

EDF is opposed to any increase in the duration of the suspension period and even requested in the past to lower the current suspension period to 10 minutes. As such EDF does not support the proposed amendments. NEMOs should consider the minimization of the overall disruption of IDCT as a primary objective and should find alternative ways, such as parallelization of tasks, to accommodate the flow-based implementation. In addition to this opposition on the principle of the proposal, EDF would like to underline several questions related to amendments to Article 5 and potential consistencies with the explanations given in the explanatory document:

- Indeed, NEMOs indicate that, to accommodate the IDAs-FB implementation, while at the same time maintaining the overall disruption of IDCT within 40 minutes, they propose to amend Article 5 (19) to extend the suspension period after the deadline for bid submission of each IDA from 20 to 25 minutes. Considering that the suspension period before the deadline for bid submission of each IDA is unchanged (no amendment proposed), EDF understands that the overall period is extended by 5 minutes, from 40 minutes to 45 minutes. Thus, the proposed Article 5 (19b) is inconsistent with the beginning of Article 5 (19) and with the explanation given in the explanatory note.

- Moreover, we understand that the following configuration changes are also foreseen for the operational process in XBID: o “IDA Halt from” will be changed from GCT-20 to GCT-18 o “IDA Halt to” will be changed from GCT+20 to GCT+22 In this context, it remains unclear how these operational processes are consistent with the timing of the suspension period before (20 minutes) and after (25 minutes) the deadline for bid submission of each IDA mentioned in Article 5 (19a and 19b).

EDF underlines that suspension of the cross zonal IDCT should be as short as possible and that the closing and reopening times of the intraday continuous trading should be known in advance and clearly defined in the rules. Furthermore, EDF does not see the need, under normal operations, for amending Article 6 and for the proposed reduction of 5 minutes to allow at least 25 minutes instead of 30 minutes of cross-zonal continuous trading for any MTU after the publication of the auction results. Indeed, even if a suspension period after the deadline for bid submission of each IDA of 25 minutes was retained, market participants would still have at least 35 minutes of cross-zonal continuous trading for any given MTU.

EDF understands that the proposal to reduce the minimal period of cross-zonal continuous trading for any given MTU from 30 to 25 minutes in article 6 aims to accommodate non-normal days during which the IDA process would be completed around GCT+33.5.

We also would like to take the opportunity to raise an issue regarding the publication of the capacity available, especially for IDA2. Currently the available capacity is published at 21h45 CET on D-1. As IDCC(b) is a full recalculation, large volumes can be allocated in the algorithm for IDA2. We have recently noticed that with these large volumes allocated, it implies significant changes in the market, with prices moving up and down (in IDA2 vs continuous trading) in several bidding zones. We therefore would like to have an anticipated publication of the capacity for the coming IDA. This should ideally be published around 21:00 to leave market participants enough time to prepare their orders for the coming IDA2. But the cross zonal continuous trading should not be interrupted at that time. This initial capacity publication could be considered as a preliminary view of the capacity and then finalized at 21h45.