

Explanatory note for the all-NEMOs analysis on amendments to the terms and conditions applied for the “Products That Can be Taken into Account in the Single Day-Ahead Coupling” in accordance with Article 40 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management

14 July 2026

Disclaimer

This explanatory document is submitted by all NEMOs to the European Union Agency for the Cooperation of Energy Regulators for information and clarification purposes on possible amendments to the terms and conditions applied for the “Products That Can be Taken into Account in the Single Day-Ahead Coupling”, in accordance with Article 40 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management.

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1. Introduction

In accordance with Article 40(3) of CACM, all NEMOs must consult market participants at least every two years to ensure that the terms and conditions governing SDAC products continue to meet their objectives and that the products available reflect market-participant needs. In particular, in accordance with Article 40(3), amendments to terms and conditions under consultation may be proposed and occur, according to Article 40(4), if needed, pursuant to the results of public consultation.

This explanatory note sets out the legal, analytical and operational context for the review of the terms and conditions applied to the “Products That Can be Taken into Account in the Single Day-Ahead Coupling” (the “SDAC Products Methodology”, “SDAC PM” or the “Methodology”), as currently in force under ACER Decision 13/2024. It presents the assessment of product and order-type usage following the introduction of 15-minute products and the 15-minute MTU in SDAC and records the outcome of the 2026 public consultation of the NEMOs.

2. Background

The SDAC Products Methodology specifies the products and order types that may be taken into account when submitting sell and buy orders in SDAC, as provided for in Article 40(1) of CACM.

Article 7(3) of Annex I to the Methodology states:

“All NEMOs shall reassess the classification of SDAC products into mandatory and optional products and propose amendments following the next review of these terms and conditions.”

In reasoning 37-41 in ACER Decision 13/2024, ACER argued that Mandatory Products are the ones which meet the requirements of Article 40(2) of CACM Regulation and that the distinction between mandatory and optional products becomes relevant where the algorithm is no longer able to accommodate all the SDAC products. In such cases, in order to ensure that the algorithm continues to support mandatory products, NEMOs should reduce or cancel the offering of the optional products.

NEMOs undertook a review of the mandatory products (MTU Orders, Period Orders and Simple Block Orders) and optional products (Complex Block Orders and Scalable Complex Orders) over the period from 1 October 2025 to 28 February 2026. The review assessed the usage of all relevant products and order types following the 15-minute MTU go-live.

The review was undertaken to determine whether an amendment to the SDAC Products Methodology was needed considering the data, the needs of market participants, operational-security considerations and the objectives of CACM. NEMOs consulted MPs on the proposal of not changing the current text of SDAC Products Methodology, based on the results of the conducted analysis. The public consultation was run between May 18 until June 18, 2026, a dedicated webinar with stakeholders was held on May 28, 2026.

The public consultation was conducted in accordance with Article 12 of CACM. Its outcome and the NEMOs responses are summarised in Section 3 of this note.

The NEMO's supporting analysis is reported in Section 4, while the final proposal is reported in Section 5.

3. Executive Summary of Public Consultation

The public consultation was conducted from 18 May to 18 June 2026 in accordance with Articles 12 and 40(3) of CACM. NEMOs received nine responses from AXPO, the Electricity Association of Ireland (EAI), EDP, Energia, Edison, Energy Traders Europe, ENGIE, Eurelectric and RWEST. The responses, [published now under the public consultation webpage](#), provide useful evidence on the practical role of the existing products and order types following the go-live of the 15-minute MTU in SDAC. Table 5 of Appendix 1 of this explanatory note provide a summary of the respondents' answers to the questions posted by NEMOs.

With regard to the consultation process, NEMOs note that the biennial review is required to assess whether amendments are needed, not to predetermine an amendment irrespective of the evidence. The explanatory note presented the post-go-live product-usage analysis, the alternatives assessed, and targeted questions on market-participant needs. The consultation responses included both support for the current approach and requests for change, demonstrating that respondents were able to provide independent and divergent views.

Overall, the substantive feedback supports retaining the current SDAC Products Methodology at this stage. Respondents broadly confirmed that the existing product suite continues to provide an effective framework for participation in SDAC. At the same time, several respondents requested further product availability, enhanced transparency on algorithmic performance, and future development of products for storage and advanced portfolio optimisation. These requests are addressed below and will remain relevant for future reviews and product-development work.

A consistent message concerned the continuing need for 60-minute Period Orders. Respondents explained that these orders support assets with minimum run-time, minimum down-time and continuity requirements, including flexible thermal and hydro assets. They also noted that a withdrawal or temporary restriction of 60-minute Period Orders could lead to non-smooth schedules, greater use of Block Orders and, where needed, additional adjustments in subsequent markets. This feedback is consistent with the usage analysis and supports the NEMOs conclusion that a reclassification of Period Orders would not provide a reliable or proportionate corrective measure.

Respondents also supported retaining 60-minute Block Orders. The consultation feedback underlined that hourly granularity remains relevant for the operational constraints of several assets, while the simulations described in this note did not demonstrate a material performance benefit from converting 60-minute and 30-minute Block Orders into 15-minute equivalents. NEMOs therefore do not propose to remove the 60-minute granularity for Block Orders.

The feedback confirmed the importance of the Minimum Acceptance Ratio (MAR) parameter for scheduling and operational stability. Market participants that use Block Orders consider MAR useful or essential, while the quantitative and qualitative evidence does not support the assumption that removing

MAR would simplify the order book. NEMOs therefore maintain that the MAR parameter should remain available within the current definition of Block Orders.

Respondents from the SEM also stressed the value of Scalable Complex Orders (SCOs) for reflecting operational and commercial constraints. Other respondents requested wider availability of linked, exclusive and loop Block Orders, including in specific bidding zones. NEMOs acknowledge the operational value of these advanced order types. Their classification as optional products does not diminish that value; rather, it preserves the ability to manage algorithmic performance while allowing their use where the relevant NEMO and NRA arrangements permit.

Several respondents requested additional transparency on algorithmic performance and on the use of Corrective Measures (CMs). NEMOs will consider how to provide further insight through the relevant stakeholder fora, including the Market Coupling Consultative Group. CMs remain a necessary safeguard for exceptional circumstances, but they are intended to be temporary and applied only where other available mitigation measures are insufficient or not applicable.

On balance, the consultation feedback reinforces the evidence from the quantitative assessment: the current classification and product set remain appropriate, and no amendment to the SDAC Products Methodology is recommended at this stage. NEMOs will continue to monitor product usage, algorithmic performance and stakeholder needs, and will reassess the methodology in the next review cycle or earlier where a substantiated need arises.

4. Analysis of Product Usage

4.1 Number of Submitted Orders

To assess whether an amendment to the SDAC Products Methodology was needed, NEMOs first examined product usage during the first five months following the go-live of the 15-minute MTU. Usage is a key determinant of algorithmic performance and, where relevant thresholds are exceeded, may be a trigger for Corrective Measures. The assessment therefore seeks to balance market-participant needs with the capability of the algorithm. Consistent with the recurring CACM Annual Report, the initial analysis is based on the total number of submitted orders for the products and order types available. Table 1 and Figures 1 to 3 show that the majority of orders were submitted using 15-minute MTU products.

Granularity	No. of STEPs ^(*)	No. of SCOs	No. of SIMPLE BOs	No. of Complex ^(**) BOs
15'	115,955,094	5,339	507,630	439,969
30'	3,925,435	2,838	9	0
60'	16,462,984	0	208,237	134,387
	136,343,513	8,177	715,876	574,356

Table 1, Total Number of Orders submitted in the SDAC sessions for Order Types and Products supported

(*) Number of Steps or intervals included in the aggregated Curves submitted at the BZ level.

(**) Complex Block Orders according to SDAC PM.

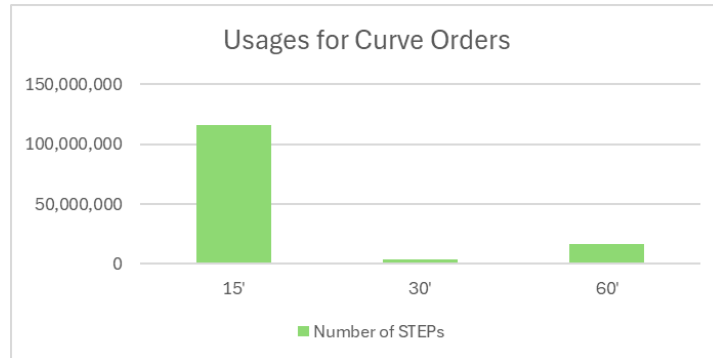


Figure 1

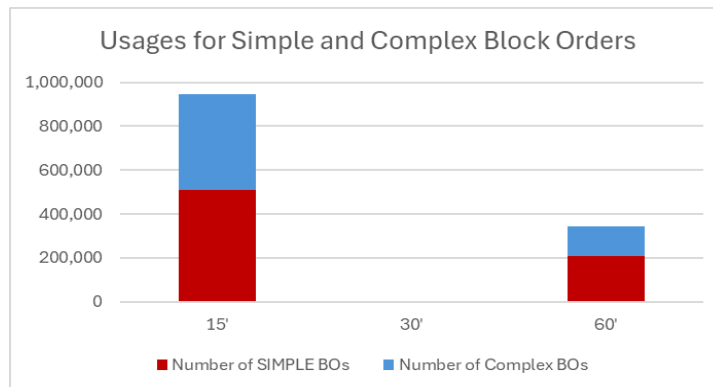


Figure 2

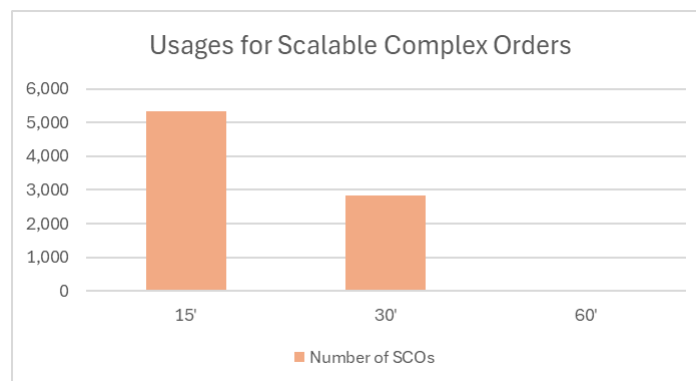


Figure 3

4.2 Usage of Curve Orders

When the analysis of Curve Orders is complemented by the submitted volumes, excluding bidding-zone granularity, it confirms that 15-minute MTU Orders account for the majority of submitted Curve-Order volumes.

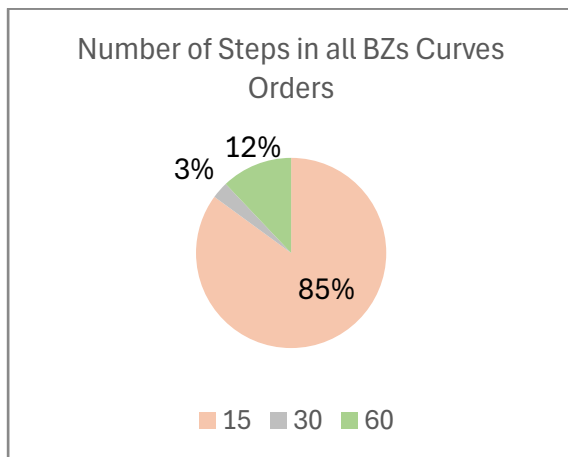


Figure 4

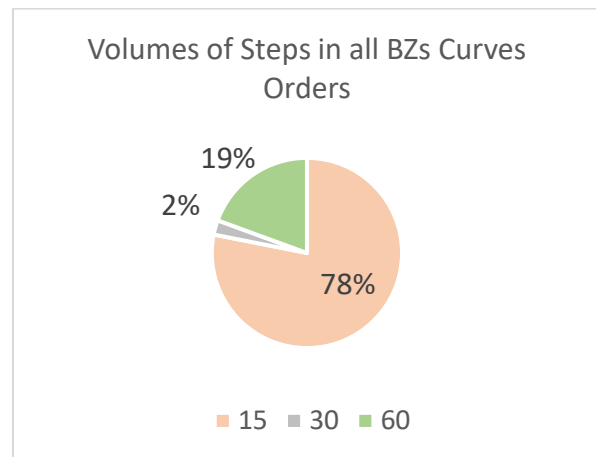


Figure 5

However, the country-level analysis shows that 60-minute granularity continues to represent a significant share of submitted volumes in several countries. Tables 2 and 3 present the share of 60-minute Period Orders by submitted volume and number of orders, respectively.

Submitted volumes			
Country	Time Granularity		
	15	30	60
Austria	49%	0%	51%
Belgium	58%	0%	42%
Bulgaria	73%	0%	27%
Croatia	57%	0%	43%
Czechia	51%	0%	49%
Denmark	68%	0%	32%
Estonia	97%	0%	3%
Finland	89%	0%	11%
France	65%	0%	34%
Germany	82%	0%	18%
Greece	94%	0%	6%
Hungary	77%	0%	23%
Ireland	0%	100%	0%
Italy	81%	0%	19%
Latvia	95%	0%	5%
Lithuania	93%	0%	7%
Netherlands	61%	0%	39%
Norway	89%	0%	11%
Poland	59%	0%	41%
Portugal	100%	0%	0%
Romania	39%	0%	61%
Slovak Republic	82%	0%	18%
Slovenia	66%	0%	34%
Spain	100%	0%	0%
Sweden	81%	0%	19%
Northern Ireland	0%	100%	0%
Total	78%	2%	19%

Table 2

Number of submitted orders			
Country	Time Granularity		
	15	30	60
Austria	73%	0%	27%
Belgium	80%	0%	20%
Bulgaria	91%	0%	9%
Croatia	77%	0%	23%
Czechia	77%	0%	23%
Denmark	78%	0%	22%
Estonia	99%	0%	1%
Finland	91%	0%	9%
France	73%	0%	27%
Germany	92%	0%	8%
Greece	97%	0%	3%
Hungary	86%	0%	14%
Ireland	0%	100%	0%
Italy	92%	0%	8%
Latvia	97%	0%	3%
Lithuania	98%	0%	2%
Netherlands	78%	0%	22%
Norway	97%	0%	3%
Poland	52%	0%	48%
Portugal	100%	0%	0%
Romania	82%	0%	18%
Slovak Republic	80%	0%	20%
Slovenia	90%	0%	10%
Spain	100%	0%	0%
Sweden	94%	0%	6%
Northern Ireland	0%	100%	0%
Total	85%	3%	12%

Table 3

Green: Less than 20%, Yellow: between 20% and 40%, Red: more than 40%

4.3 Assessing the Risk of Replacing 60-Minute Period Orders with Block Orders

The SDAC Products Methodology currently classifies 60-minute products and the relevant Period Orders as mandatory products. Under normal algorithmic conditions, Market Participants may use Period Orders regardless of whether they are classified as mandatory or optional. However, where a product is not available, including during a temporary Corrective Measure applied under Article 12 of the Algorithm Methodology, Market Participants are likely to use alternative products or order types to meet their scheduling needs.

By design, 60-minute and 30-minute Period Orders cover four and two 15-minute periods, respectively. Under their acceptance rules, any cleared volume must be the same MW quantity in each of the included 15-minute periods.

For the purpose of assessing a possible replacement of 60-minute or 30-minute Period Orders by Block Orders spanning multiple 15-minute periods or MTUs, NEMOs note that the two products are not fully equivalent and their algorithmic treatment differs. The following observations therefore provide an indicative assessment of the likely impact.

The maximum number of Block Orders tested in the latest scalability scenario in the 2024 Scalability Report was approximately 36,577.

During the five-month analysis period, approximately 136 million steps were submitted. If the 12% of steps submitted at 60-minute granularity (aggregated at BZ level) were replaced one-for-one by Block Orders, this would imply almost 16 million additional Block Orders (lower bound estimation due to the aggregation of steps at the BZ level), or an average increase of approximately 109,000 per SDAC session. In peak situations, this would represent a substantial increase relative to the current order-book magnitude of approximately 8,000 Block Orders per session. Even where several steps are combined into larger Block Orders, the increase in discrete components could create material difficulties for the algorithm.

NEMOs also expect an adverse effect if a Corrective Measure were to restrict Period Orders. Simplifying Curve-Order management in this way could increase the use of Block Orders and thereby increase, rather than reduce, the risk of algorithmic-performance degradation. Removing a product with a comparatively low direct impact on the algorithm could therefore deliver disproportionate or negative results.

4.4 Usage of SCOs in Spain, Portugal and SEM (Ireland/Northern Ireland)

Scalable Complex Orders (SCOs) are another order type with a comparatively small number of submitted orders but significant submitted volumes. As shown in Table 4 for Spain, Portugal and SEM (Ireland/Northern Ireland), SCOs account for around 20% of submitted volumes in the affected bidding zones. SCOs therefore allow market participants to express their requirements with relatively few orders and a limited impact on algorithmic complexity.

BZ/A	Submitted volumes SCO	Submitted volumes Curves	Submitted volumes BO	Total	SCOs %
	(MWh)	(MWh)	(MWh)	(MWh)	
Northern Ireland	1,710,420	10,924,676	0	12,635,096	21%
Republic Of Ireland	10,441,844	35,474,440	0	45,916,284	
Spain	52,160,165	192,565,143	28,686,620	273,411,927	17%
Portugal	8,122,663	70,667,331	68,696	78,858,690	

Table 4, Usage of SCOs in Spain, Portugal and SEM (Ireland/ Northern Ireland)

4.5 Parameters of Block Orders

Under the SDAC Products Methodology, the Minimum Acceptance Ratio (MAR) is a market-participant-selected parameter between 0 and 1 introduced to make Block Orders more flexible, support the scheduling needs and operational stability of the underlying assets, and facilitate algorithm convergence. Before this MAR introduction the Simple Block Order implementation resembled a “fill-or-kill” condition. Removing MAR from the definition of Block Orders would be counterproductive for market participants and could adversely affect algorithmic performance.

In a Block-Order implementation without MAR, or with an implicit MAR of 1 corresponding to fixed all-or-nothing acceptance, market participants would be expected to submit a larger number of Block Orders with smaller volume granularity, potentially including linked families, to reproduce the flexibility provided by a MAR below 1. Conversely, an implementation without MAR based on an implicit MAR of 0, corresponding to a fully curtailable block, would prevent market participants from consistently defining profiles that reflect their operational and scheduling needs rendering Block Orders completely useless for MPs. The impact would be more severe where Simple Block Orders are combined in linked families or exclusive groups to express the bidding strategies and acceptance requirements of assets or portfolios.

Relaxing or abolishing MAR would therefore be expected to have adverse effects on both algorithm convergence and market-participant scheduling, including the feasibility of resulting schedules.

4.6 Further Analysis

In the context of JET-A, ACER requested that NEMOs investigate the need for 60-minute Block Orders and quantify the effect of removing their 60-minute granularity, so that only 15-minute Block Orders could be submitted. The objective was to assess whether greater standardisation of products and order types could improve algorithmic performance.

NEMOs observe that, although most Block Orders are submitted at 15-minute granularity, approximately 30% of submitted Block Orders and 20% of submitted Block-Order volumes continue to use 60-minute granularity (see Figures 6 and 7).

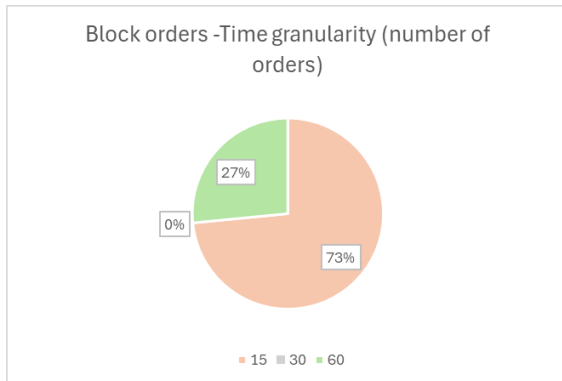


Figure 6

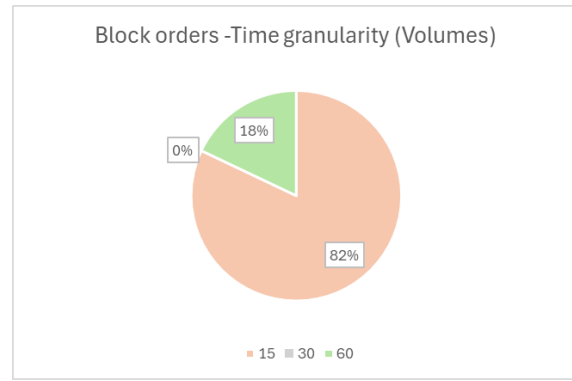


Figure 7

The use of 60-minute Block Orders is more material in some countries than in others. Tables 5 and 6 report the respective shares by submitted volume and number of orders.

Submitted volumes			
Country	Time Granularity		
	15	30	60
Austria	12%	0%	88%
Belgium	92%	0%	8%
Bulgaria	77%	0%	23%
Croatia	16%	0%	84%
Czechia	97%	0%	3%
Denmark	12%	0%	88%
Estonia	63%	0%	37%
Finland	85%	0%	15%
France	97%	0%	3%
Germany	86%	0%	14%
Greece	100%	0%	0%
Hungary	51%	0%	49%
Ireland	0%	0%	0%
Italy	90%	0%	10%
Latvia	1%	0%	99%
Lithuania	78%	0%	22%
Netherlands	58%	0%	42%
Norway	50%	0%	50%
Poland	90%	0%	10%
Portugal	100%	0%	0%
Romania	58%	0%	42%
Slovak Republic	82%	0%	18%
Slovenia	59%	0%	41%
Spain	100%	0%	0%
Sweden	95%	0%	5%
Northern Ireland	0%	0%	0%
Total	82%	0%	18%

Table 5

Number of submitted orders			
Country	Time Granularity		
	15	30	60
Austria	15%	0%	85%
Belgium	68%	0%	32%
Bulgaria	38%	0%	62%
Croatia	7%	0%	93%
Czechia	83%	0%	17%
Denmark	66%	0%	34%
Estonia	94%	0%	6%
Finland	76%	0%	24%
France	76%	0%	24%
Germany	90%	0%	10%
Greece	100%	0%	0%
Hungary	77%	0%	23%
Ireland	0%	0%	0%
Italy	78%	0%	22%
Latvia	18%	0%	82%
Lithuania	54%	0%	46%
Netherlands	67%	0%	33%
Norway	78%	0%	22%
Poland	27%	0%	73%
Portugal	100%	0%	0%
Romania	41%	0%	59%
Slovak Republic	73%	0%	27%
Slovenia	63%	0%	37%
Spain	100%	0%	0%
Sweden	82%	0%	18%
Northern Ireland	0%	0%	0%
Total	73%	0%	27%

Table 6

Green: Less than 20%, Yellow: between 20% and 40%, Red: more than 40%

NEMOs also performed a simulation to assess the effect on algorithm performance of converting 60-minute and 30-minute Block Orders into 15-minute equivalents. The simulation covered fourteen delivery days from 25 January to 7 February 2026, selected because their Time to First Solution (TTFS) was comparatively high. All 60-minute and 30-minute Block Orders were converted into equivalent 15-minute Block Orders. The reference sessions and converted sessions were run on the same machine to ensure comparability of the results in Table 7.

Based on these results, NEMOs cannot conclude that converting 60-minute and 30-minute Block Orders into 15-minute equivalents would materially improve algorithmic performance. NEMOs therefore do not propose to remove the 60-minute granularity available for the submission of Block Orders.

Indicator	Before conversion	After conversion
Average number of solutions found	2.8	2.5
Average Time to first solution (s)	699	685
Average economic surplus (€/session)	15,594,110,023	15,594,109,481
Average Number of PRBs	19.9	18.9

Table 7

5. NEMO's proposal

NEMOs consider that Article 40(2) does not exhaustively limit the products that may be accommodated by the price coupling algorithm. The appropriate mandatory set must also reflect market-participant needs and the operational consequences of removing a product. The evidence in this review shows that Period Orders are an efficient way of representing multi-MTU requirements and that replacing them with Block Orders could materially increase the number and complexity of discrete orders. A corrective measure targeting Period Orders would therefore be ineffective or counterproductive in circumstances where performance needs to be restored.

An analysis of product usage following the go-live of the 15-MTU— reported in sections 4 —showed that replacing Period Orders with Simple Blocks would risk having a negative impact on the algorithm's performance, as the usage range quantified for Simple Blocks in the latest scalability assessment would easily be exceeded. From this perspective, the NEMOs still consider Period Orders as a basic instrument necessary to support multiple MTUs, having considered basic products to be those that have a minimal impact on the algorithm's performance while simultaneously meeting the requirements of Article 40(2) of the CACM. For such reason, NEMOs are not proposing to change the classification of Period Orders and proposed to keep them among the mandatory products.

NEMOs reach a comparable conclusion on MAR. Removing the parameter would not remove the underlying computational considerations associated with partially accepted Block Orders, since such choice would correspond to either a MAR of 1 (all or nothing) or a MAR of 0. A market design based on an implicit MAR of 1 would incentivise the use of a larger number of smaller Block Orders to recreate flexibility while it could also create non-convergence situations in cases of low liquidity (like the Intraday Auctions). On the other hand, an implicit MAR of 0 would limit the ability of market participants to define profiles that reflect their operational needs rendering Block Orders useless to them. A Simple Block order with MAR=0 would resemble a step curve order. Either outcome could adversely affect scheduling feasibility and algorithmic performance, particularly when Block Orders combined in linked families or exclusive groups would increase.

NEMOs would like to stress that CACM Regulation in Article 40(3) subparagraph a) request NEMOs to ensure that available products reflect the needs of MPs, in this perspective amending the definition of a product in a way which would make it simpler from a legal point of view, but less suitable for MPs needs and less flexible for the algorithm accommodation, would have counterproductive effects, create issues to the market and clearly would not be in-line with the Regulation provisions.

With regard to the consultation process, NEMOs note that the biennial review is required to assess whether amendments are needed, not to predetermine an amendment irrespective of the evidence. The explanatory note presented the post-go-live product-usage analysis, the alternatives assessed, and targeted questions on market-participant needs. The consultation responses included both support for the current approach and requests for change, demonstrating that respondents were able to provide independent and divergent views. NEMOs have therefore reconsidered the classification of products and the MAR parameter in light of the available quantitative evidence and stakeholder feedback. The conclusion remains that no amendment is justified at this stage. This conclusion does not preclude future amendments where monitoring, operational experience or a targeted product-development process identifies a substantiated need.

In summary, the distinction between mandatory and optional products is relevant primarily where Corrective Measures need to be applied. NEMOs consider that the existing framework already provides the tools needed to restore algorithmic performance to a satisfactory level, including pre-tested alternative configurations, optional product and order types, ramping measures and TSO parameters. In this context, reducing or removing 30-minute and 60-minute Period Orders is expected to provide only limited benefits, or potentially adverse results.

The comparatively low aggregate use of 30-minute and 60-minute Period Orders does not, by itself, indicate a meaningful performance gain from restricting them. Linear step orders have a limited direct effect on algorithmic performance, while 15-minute granularity is already widely used. Restricting 30-minute and 60-minute Period Orders would be likely to increase the use of Simple or Complex Block Orders and therefore increase the complexity of the SDAC order book, contrary to the intended purpose of a Corrective Measure. Therefore, NEMOs consider that reclassifying 30-minute and 60-minute Period Orders as optional products or order types is neither necessary nor fit for purpose, as suitable Corrective Measures already exist under the Algorithm Methodology.

Based on the quantitative analysis, stakeholder feedback and the considerations described above, NEMOs do not recommend any change to the existing text of the SDAC Products Methodology at this stage.

6. Storage Orders

Storage Orders are not yet industrialised. NEMOs and TSOs are developing the product in a separate workstream and have conducted a dedicated stakeholder consultation. Once the product definition and

implementation approach are sufficiently mature, NEMOs will submit a supplementary proposal for the inclusion of Storage Orders in the SDAC Products Methodology.

7. Useful Links

- Commission Regulation (EU) 2015/1222 (CACM)
<https://eur-lex.europa.eu/eli/reg/2015/1222/2021-03-15>
- Regulation (EU) 2019/943
<https://eur-lex.europa.eu/eli/reg/2019/943/oj>
- ACER Decision 13/2024 (Products That Can be Taken into Account in the Single Day-Ahead Coupling)
ACER website:
[ACER Decision 13-2024 on SDAC Products](#)
[ACER Decision 13-2024 on SDAC Products - Annex I](#)
- CACM Annual Report 2024
NEMO Committee website: <https://www.nemo-committee.eu/assets/files/cacm-annual-report-2024.pdf>
- CACM Scalability Report 2024
NEMO Committee website: <https://www.nemo-committee.eu/assets/files/cacm-scalability-report-2024.pdf>

8. Abbreviations

ACER	: Agency for the Cooperation of Energy Regulators
AM	: Algorithm Methodology
CACM	: Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on Capacity Allocation and Congestion Management (Capacity Allocation and Congestion Management)
CM	: Corrective Measure
EC	: European Commission
MP	: Market Participant
MTU	: Market Time Unit
NEMO	: Nominated Electricity Market Operator
NRA	: National Regulatory Authority
SCO	: Scalable Complex Order
SDAC	: Single Day-Ahead Coupling

Appendix 1. Response Matrix

The table reproduces the selected answer option in each response cell. “No option marked” indicates a blank questionnaire option; “Narrative response only” indicates EAI’s letter-format response. Q10 is summarized in Section 3 and is not a matrix column.

Respondent	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9
Axpo	Agree	Yes	Yes - the risk is high; removal will lead to replacement with numerous Block Orders.	Yes - a possible CM gain is detrimental; Block Order substitution could increase SDAC Algorithm complexity.	Useful	Yes	Yes - maintain 60-minute granularity for Block Orders.	No option marked	Yes - support the proposal.
RWEST	Agree	Undecided	Neutral / not enough information.	Neutral / not enough information.	Useful	Yes	Undecided	No option marked	Neutral
EDP	Disagree	Yes	Yes - the risk is high; removal will lead to replacement with numerous Block Orders.	Yes - a possible CM gain is detrimental; Block Order substitution could increase SDAC Algorithm complexity.	Essential (cannot bid effectively without it)	Yes	Yes - maintain 60-minute granularity for Block Orders.	Yes	No - specific amendments are required.
EAI	Narrative response only (no option marked)	Narrative response only (no option marked)	Narrative response only (no option marked)	Narrative response only (no option marked)	Narrative response only (no option marked)	Narrative response only (no option marked)	Narrative response only (no option marked)	Narrative response only (no option marked)	No option marked; narrative supports maintaining the existing methodology.
Energy Traders Europe	Disagree	Yes	Yes - the risk is high; removal will lead to replacement with numerous Block Orders.	Yes - a possible CM gain is detrimental; Block Order substitution could increase SDAC Algorithm complexity.	No option marked	Yes	Yes - maintain 60-minute granularity for Block Orders.	Yes	No - specific amendments are required.
Edison	Agree	Yes	Yes - the risk is high; removal will lead to replacement with numerous Block Orders.	Yes - a possible CM gain is detrimental; Block Order substitution could increase SDAC Algorithm complexity.	Useful	Yes	Yes - maintain 60-minute granularity for Block Orders.	Yes	No - specific amendments are required.
ENGIE	Agree	Yes	Neutral / not enough information.	Neutral / not enough information.	Useful	No opinion	Undecided	No option marked	Yes - support the proposal.
Energia	Agree	Undecided	Neutral / not enough information.	Neutral / not enough information.	Not used in my bidding strategy	No opinion	Undecided	Yes	Yes - support the proposal.
Eurelectric	Disagree	Yes	No option marked	No option marked	Essential (cannot bid effectively without it)	Yes	Yes - maintain 60-minute granularity for Block Orders.	No option marked	No - specific amendments are required.

Table 7. Selected answer matrix - Questions 1 to 9

Colour key: green = affirmative/supportive selection; amber = neutral, undecided or no opinion; red = disagreement or a request for specific amendments; grey = no formal selected option / narrative only.

Note: The EAI narrative position is shown descriptively in the matrix but is excluded from all formal response counts because no questionnaire options were marked.

Appendix 2. Question endnotes

The complete question wording is reproduced below as endnote-style reference material for the response matrix and the open-text section.

Reference	Question text
Q1	Based on your current operational needs, do you agree that the existing suite of SDAC products (Mandatory and Optional) continues to meet the requirements of the market post-15-minute MTU go-live?
Q2	NEMOs analysis suggests that 60-minute Period Orders still account for a significant share of volumes and price steps in several countries. Do you agree that the 60-minute Period Orders should remain part of the Mandatory Products listed in the SDAC Products Methodology?
Q3	Do you agree with the NEMOs assessment that removing 60-minute Period Orders would likely lead to an increase in Block Orders, potentially degrading algorithm performance?
Q4	Do you agree with the NEMOs assessment that classifying 60-minute Period Orders as an optional offering would have detrimental performance gains if selected as a possible Corrective Measure?
Q5	How critical is the Minimum Acceptance Ratio (MAR) parameter in Block Orders for your asset scheduling and operational stability?
Q6	Do you agree with the NEMOs proposal to keep the MAR parameter to prevent fragmentation of the order book into many smaller Block Orders?
Q7	Simulation results showed that converting 60-minute/30-minute Block Orders into 15-minute equivalents did not improve significantly algorithm performance (TTFS). Do you agree that 60-minute granularity for Block Orders should be maintained?
Q8	Do you agree that the existing Corrective Measures and optional product types provide sufficient tools for NEMOs to restore algorithm performance without reclassifying products?
Q9	NEMOs propose no amendments to the current SDAC Products Methodology at this time. Do you support this approach, keeping the current status of SDAC Products Methodology products and Order Types?
Q10	Please provide any other feedback to be considered under the NEMOs evaluation for their relevant proposal to ACER/NRAs for the SDAC Products Methodology. In particular, explain the importance of 60-minute Period Orders to your organisation and your readiness to transition away from them, if required.