

To: Stakeholders and respondents
D: July 2026

Report of Public Consultation on the proposed amendments to the Algorithm Methodology for timing adjustments to the Intraday Auctions due to the introduction of Flow-Based implementation

The Algorithm Methodology sets out the methodology for the price coupling algorithm, the continuous trading matching algorithm and the intraday auction algorithm, including a common set of requirements in accordance with Article 37(5) of Commission Regulation (EU) 2015/1222 establishing a guideline on capacity allocation and congestion management (CACM Regulation).

The [2026 public consultation](#) concerned a minimum set of amendments to the Algorithm Methodology required to accommodate the implementation of flow-based capacity allocation in the Intraday Auctions (IDAs). The amendments were prepared by all NEMOs in cooperation with TSOs, taking account of the operational processes necessary to combine IDAs with continuous trading in the Single Intraday Coupling (SIDC).

In accordance with Article 55(3) of the CACM Regulation, the intraday cross-zonal capacity pricing arrangements established three pan-European IDAs to complement continuous trading in SIDC. IDAs were implemented across Europe on 13 June 2024 under net transfer capacity (NTC) allocation constraints. The proposed amendments address the timing implications of introducing flow-based capacity allocation in IDAs in the Core and Nordic capacity calculation regions, including the additional post-auction ATC-extraction process needed before continuous trading resumes.

This report summarises the feedback received from EDF and Eurelectric during the consultation and the corresponding responses of NEMOs and TSOs. NEMOs and TSOs thank both respondents for their constructive contributions.

The feedback and the NEMOs and TSOs responses are organised as follows.

A. General

I. Suspension of the cross-zonal capacity allocation within IDCT

Feedback received from EDF and Eurelectric:

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. One respondent opposed 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 the respondent does not support the proposed amendments.

Another responded call on NEMOs to revise the proposed amendments to ensure that the total suspension time of continuous intraday markets is minimized.

For both respondents, parallelization of tasks should be implemented in order to minimize the SIDC CT interruption.

Answer from NEMOs and TSOs:

NEMOs and TSOs note that the continuous trading suspension period – 20 minutes prior to GCT and 20 minutes after GCT (i.e. a total duration of 40 minutes) – as prescribed by the existing Algorithm Methodology, is considered appropriate for normal day-to-day operations under the current ATC methodology, as demonstrated by two years of operational experience.

With the introduction of Flow-Based (FB) capacity allocation, an additional process is required to ensure that the market remains within the secure operational domain following the Intraday Auction (IDA). Therefore, as outlined in the explanatory note, an additional process – namely ATC extraction after IDA allocation – is introduced.

NEMOs and TSOs acknowledge the interest of market participants in maintaining an unchanged suspension framework. Accordingly, the proposed approach respects the requirement that, under normal operating conditions, the duration of the suspension period shall not exceed 40 minutes. This is allowed in particular due to improved parallelization of tasks.

II. Publication of the capacity available for IDA2

Feedback received from EDF:

Issue with 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 21:45.

Answer from NEMOs and TSOs:

The anticipated capacities to be published within the Intraday Auctions (IDA) cannot be made available at an earlier stage, as their determination follows a complex CCR-level process involving data collection and grid modelling on the capacity calculation region level which is defined in the view of fact that the data serve as input for specific IDA. Running these calculations earlier would make the entire process less accurate and result in more conservative capacity determination.

III. Locked cross-zonal flow in the Nordic context

Feedback received from Eurelectric:

The respondent calls for a further assessment of the root causes of the locked cross-zonal flow observed in the Nordic context in the subsequent timeframe after the introduction of FB in DA: "we understand is related to the mismatch between flow-based capacity allocation in the day-ahead

auction and ATC extraction in the intraday timeframe. Eurelectric would like to understand whether the introduction of flow-based in IDAs will fully address this issue, or whether it could materialize again between the intraday auctions and the subsequent timeframes of intraday continuous and balancing.”

Answer from NEMOs and TSOs:

The amendment is limited to the changes required to support the introduction of flow-based allocation in the intraday auctions, in particular timing adjustments to the IDA process. As the question concerns the Nordic flow-based capacity calculation design, it should instead be addressed through the Nordic flow-based stakeholder process. This regional forum is better suited to discuss this specific concern.

B. Article 5

I. Overall suspension period

Feedback received from EDF and Eurelectric:

The respondents understand that the overall period is extended by 5 minutes, from 40 minutes to 45 minutes. Thus, the proposed Article 5 (19b) found inconsistent with the beginning of Article 5 (19) and with the explanation given in the explanatory note.

One respondent considers that regions not implementing FB in IDAs should not be affected by this longer suspension time.

Answer from NEMOs and TSOs:

NEMOs and TSOs understand that, when considering Articles 5(19a) and 5(19b) in isolation, parties may conclude that the intention is to extend the continuous trading suspension period. However, these provisions - relating to specific periods before and after the IDA GCT - must be read in conjunction with the explicit limitation of the suspension period to 40 minutes as set out in Article 5(19).

To avoid such misinterpretation, the final proposal will refer solely to the interruption period under normal conditions, while further details will be addressed in the operational procedures/rules.

II. Operational configuration changes in XBID

Feedback received from EDF:

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).

The timeframe foreseen should not allow the process to drift towards longer execution times over time, thereby increasing the duration of the suspension of continuous trading in practice. Eurelectric underlines that the suspension time of SIDC continuous before and after IDA gate closure time should be predictable and clearly defined in the operational rules.

Answer from NEMOs and TSOs:

While NEMOs and TSOs have been transparent regarding the planned configuration and the intention to maintain a 40-minute suspension of continuous trading under normal day operation, it was not considered appropriate to specify exact time intervals (e.g. GCT-18 vs. GCT+22) within the methodology proposal therefore the suggestion relied on numbers “rounded” to 5 minutes i.e. GCT-20 and GCT+25.

In order to avoid potential confusion, the final proposal will refer exclusively to the total suspension duration of 40 minutes, rather than explicitly specifying time intervals before and after GCT.

The time intervals before and after the IDA Gate Closure Time (GCT) as communicated in the explanatory note indeed form part of the operational rules and will be made available to market participants as part of the relevant operational information and documentation.

C. Article 6

I. Minimum period of continuous trading after publication of auction results

Feedback received from EDF and Eurelectric:

The respondent 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.

Answer from NEMOs and TSOs:

NEMOs and TSOs take note of the comments. The final proposal will retain the existing 30-minute minimum period for cross-zonal continuous trading after the publication of IDA results under normal operation; the amendment to Article 6(12) will therefore not be pursued.

II. Fallback processes in non-normal situations

Feedback received from Eurelectric:

When it comes to the design fallback processes in non-normal situations, the respondent has the following concerns:

Case 1 - Absence of updated ATC/NTC delivery: In cases where IDA results are successfully computed and validated but updated ATCs/AACs are not delivered to XBID, the proposed solution foresees a resumption of cross-border continuous trading limited to ATC borders, while FB borders may remain inactive. This raises concerns regarding the persistence and resolution of such situations. In particular, it remains unclear when and how cross-border trading on XBID would restart on FB borders once the data becomes available, or how prolonged failures would be handled. This results in a partial and asymmetric market functioning, where part of the system operates under degraded capacity

constraints. In addition, the absence of clear guarantees or timelines regarding the restoration of normal operations introduces uncertainty for market participants.

Case 2 - FB domain decoupling and IDA cancellation: In the event of FB domain decoupling or IDA cancellation, the design foresees a fallback to ATC-based continuous allocation; however, the operational handling differs between Core and Nordic regions. While Core borders may resume continuous trading even if updated NTCs are not immediately available (with updates occurring later), Nordic borders may remain halted until consistent capacity data is provided. This divergence and the trade-off between continuity (Core) and consistency (Nordics) is not explicitly justified, further clarification would be beneficial to ensure transparency and predictability. Different fallback logics across regions may lead to inconsistent trading conditions and unequal access to cross-zonal capacity. In this context, it could also be assessed whether an approach similar to that foreseen under Case 3 (namely reverting to previously established NTC values) could be applied in Case 2 situations. Such an approach could allow trading to resume swiftly and in a harmonised manner across regions, while ensuring a minimum level of consistency until updated capacity data becomes available.

Case 3 - Post-validation cancellation of IDA results: In cases where IDA results are validated and subsequently cancelled, the proposed approach consists in reverting to the previously established NTC values. It would be important to clarify the conditions under which such post-validation cancellations may occur.

Answer from NEMOs and TSOs:

Relevant to the cases mentioned NEMOs and TSOs note the following:

Case 1: The primary responsibility of TSOs is to ensure secure grid operation. Under exceptional circumstances, such as failures in capacity calculation tools or in the communication between TSOs and XBID which would endanger the secure grid operation additional cross-zonal capacity allocation cannot be allowed.

In such cases, TSOs put in place robust internal processes to address these situations as quickly as possible, recognizing that such incidents may lead to delays in the resumption of continuous trading. These processes include a combination of automated and manual fallback procedures, as well as appropriate monitoring and alerting mechanisms. For avoidance of doubts any border where the risk of unsecure operation was removed is available for continuous trading after IDA. This means that not only ATC borders but also borders of FB domain which was not facing any technical issues would be available for allocation. This should not be seen as degraded capacity constraints as capacity constraints for relevant part of the topology are correct.

Case 2: It should be noted that, in cases where IDA domain automated decoupling or IDA cancellation occurs, sufficient time is provided to TSOs to calculate backup NTC values based on the most up-to-date grid model data. So, the case at hand is again an extraordinary situation. In line with the regional organization of capacity calculations (including regional IDCCM), the design of backup processes also follows a regional approach. These backup processes are tailored

to ensure secure system operation within the relevant part of the network topology, recognizing that grid characteristics may differ across regions.

Case 3: The post-validation cancellation of IDA results (triggered by NEMOs following successful validation in XBID CMM) is an already existing scenario and is not dependent on the introduction of Flow-Based (FB) capacity allocation.

The triggering conditions primarily relate to the absence of final global confirmation by NEMOs. These conditions are, in principle, aligned with those applied in the Day-Ahead (DA) timeframe. For avoidance of doubts the reversion to previously established NTC values is a reversion to the same values which are planned to be used in Case 2 i.e. when IDA was cancelled prior TSOs validation.