

To: Stakeholders and respondents
D: July 2026

Report of Public Consultation on the 2026 Review of the SDAC Products Methodology

The SDAC Products Methodology sets out the products and order types that can be taken into account when submitting sell and buy orders in Single Day-Ahead Coupling (SDAC), pursuant to Article 40 of the CACM Regulation.

NEMOs conducted the [2026 public consultation](#) to gather stakeholder views on whether the current SDAC Products Methodology should be amended following the introduction of the 15-minute Market Time Unit (MTU) and the subsequent product-usage assessment. The consultation proposal was to maintain the current methodology without amendment.

This report summarises the substantive narrative feedback received and the corresponding NEMOs responses. For clarity, it does not reproduce the individual tick-box selections made in the questionnaire. The report instead focuses on general comments and free-text observations submitted by the respondents. The substantive narrative submissions summarised below were received from Axpo, the Electricity Association of Ireland (EAI), EDP, Energia, Edison, Energy Traders Europe, ENGIE, RWEST and Eurelectric. NEMOs thank all respondents for their constructive contributions.

The feedback and the NEMOs responses are organised as follows.

A. General observations

The following remarks address the overall approach to the review and the continuing adequacy of the SDAC product suite.

I. Support for maintaining the current methodology

Feedback received: *EAI and Energia welcome the regular review of the SDAC Products Methodology and support retaining the current framework. Both consider that the existing suite of products and order types remains effective for participation in SDAC, and they underline the continuing importance of SCOs in the SEM.*

NEMOs response: NEMOs take note of this support. The post-go-live product-usage analysis and the narrative feedback support the conclusion that the current SDAC Products Methodology continues to provide an appropriate framework for market participation. NEMOs will continue the regular review cycle and stakeholder engagement as market usage and operational experience evolve.

B. Product and order-type feedback

The following remarks concern the classification, availability and practical use of products and order types in SDAC.

I. Mandatory and optional products; availability across markets

Feedback received: *EDP considers that the current distinction between mandatory and optional products may create competitive disadvantages where products are not made available in all markets. It points to potential restrictions on portfolio optimisation and suggests distinguishing instead between products that may be subject to corrective measures and products that may not.*

NEMOs response: NEMOs clarify that the mandatory/optional classification defines the product set that must be supported by the price-coupling algorithm. It does not, by itself, require every NEMO to offer each product in every bidding zone; product availability at NEMO level remains subject to the applicable local arrangements and regulatory decisions. The classification is particularly relevant during a temporary performance-degradation situation: mandatory products remain supported, while restrictions may be applied to optional products only under the conditions and governance set out in the Algorithm Methodology. NEMOs take note of the concern regarding consistency of product availability and will continue to monitor it within the relevant governance scope.

II. 60-minute Period Orders

Feedback received: *Axpo, Edison, Energy Traders Europe, Eurelectric and RWEST emphasise that 60-minute Period Orders remain important for flexible and technically constrained assets, including thermal and hydro assets. The majority of respondents warn that removing, or reclassifying as optional, 60-minute Period Orders could result in a migration to a larger number of simple and complex Block Orders, more non-smooth profiles and, in some cases, additional reliance on subsequent markets to adjust schedules. They consider that these effects could impair efficient price formation and market participation.*

NEMOs response: NEMOs note the broad support for retaining 60-minute Period Orders. The post-go-live product-usage analysis indicates that these orders continue to support market participants' scheduling needs and that their removal could induce substitution towards Block Orders. Such substitution could increase order-book complexity and would not be expected to deliver a material algorithm-performance benefit. NEMOs therefore maintain the current proposal: 60-minute Period Orders and 60-minute Simple Block Orders remain mandatory products. Optional product offerings continue to be made available where implemented under the applicable local and regulatory arrangements. NEMOs will continue to monitor actual usage and performance through the established review and request-for-change processes.

III. 60-minute Block Orders

Feedback received: *Energy Traders Europe considers that a number of flexible assets continue to be operated on an hourly granularity because of technical and safety constraints. The respondent is concerned that replacing 60-minute products solely with 15-minute Block Orders could make it more difficult to represent such constraints, create more complex bidding strategies and increase the*

likelihood of undesirable acceptance outcomes. The respondent also highlights the importance of preserving bidding flexibility, while recognising that the effect of a Block Order on partial acceptance depends on the selected order design and MAR.

NEMOs response: NEMOs acknowledge that 60-minute Block Orders remain relevant for certain assets and bidding strategies. The current proposal retains both 60-minute Block Orders and 60-minute Period Orders. NEMOs note that the effect of replacing a 60-minute product by 15-minute Block Orders depends on the number, composition and parameters of the submitted bids, including MAR; it cannot therefore be assumed that every 15-minute alternative would have the same outcome. Nevertheless, a broad shift towards numerous 15-minute Block Orders could increase order-book complexity. This supports retaining the current product offering while NEMOs continue to assess usage and algorithm performance on the basis of operational evidence.

IV. Minimum Acceptance Ratio (MAR)

Feedback received: *ENGIE states that MAR remains useful for scheduling and operational stability, while noting that the available information does not enable it to assess whether retaining MAR will, by itself, prevent order-book fragmentation. Eurelectric also highlights the continuing relevance of MAR for a range of market participants.*

NEMOs response: NEMOs note that respondents regard MAR as an important bidding parameter. The product-usage assessment and stakeholder feedback indicate that MAR enables market participants to express the desired degree of volume flexibility within a Block Order. Removing it could encourage the use of multiple smaller or linked Block Orders to reproduce equivalent acceptance profiles, thereby increasing complexity. MAR cannot, in isolation, guarantee the absence of order-book fragmentation; however, it supports a more efficient representation of bidding and scheduling needs. NEMOs will continue to assess its impact using actual usage and performance data.

V. Scalable Complex Orders

Feedback received: *EAI and Energia express strong support for the continued availability of SCOs. Drawing on their experience in the SEM, they state that SCOs enable market participants to represent operational, technical and commercial constraints in day-ahead submissions and are important for optimisation and risk management.*

NEMOs response: NEMOs acknowledge the importance of SCOs for market participants in the markets where they are implemented. SCOs remain included in the SDAC Products Methodology as optional products. Their offering and use remain subject to the relevant implementation and regulatory arrangements. The present review does not propose a change to their classification.

VI. Storage-related order types

Feedback received: *Edison supports the current suite overall but identifies a need for order types that better support storage offers. The respondent suggests making Loop Block Orders mandatory, at least until the new Storage Orders become operational, and indicates its intention to provide further input in the dedicated storage-order consultation.*

NEMOs response: NEMOs and TSOs are progressing the Storage Orders workstream through the dedicated design and consultation process. Storage Orders are not included in the present review because their functional design and implementation are not yet finalised. Once the product design, implementation scope and governance steps are completed, NEMOs will address the appropriate treatment in the SDAC Products Methodology. The current review does not preclude further stakeholder input on storage-related products.

VII. Complex Block Orders

Feedback received: *Energy Traders Europe considers that linked, exclusive and flexible Block Orders are needed to represent technical constraints while providing flexibility to the algorithm, and requests wider product availability. Eurelectric asks that linked, exclusive and Loop Block Orders be classified as mandatory, arguing that they are needed to represent technical capabilities and portfolio constraints accurately and can support efficient dispatch and competition.*

NEMOs response: NEMOs recognise the scheduling capability of Complex Block Orders. The mandatory product set covers products for a single MTU and for multiple MTUs, including Period Orders and Simple Block Orders. Linked, exclusive and other Complex Block Orders build on the mandatory products and remain optional because their use may have a material effect on algorithm performance. Their availability is determined through the applicable local implementation and regulatory arrangements. NEMOs do not propose a change to this classification in the present review, but will continue to assess the product set through the established review and request-for-change processes, taking account of actual usage and performance evidence.

C. Transparency and Corrective Measures

The following comments address information-sharing on algorithm performance and the role of Corrective Measures.

I. Transparency on algorithm performance

Feedback received: *ENGIE and Eurelectric request additional transparency on algorithmic performance following the 15-minute MTU go-live. Both suggest that N-SIDE present relevant results to an upcoming Market Coupling Consultative Group meeting so that stakeholders can provide more informed feedback.*

NEMOs response: NEMOs recognise the request for further transparency. In coordination with the relevant parties, NEMOs will explore an appropriate format and timing for sharing additional non-confidential insights on post-go-live algorithm performance, product usage and relevant performance indicators through the established stakeholder channels, including the MCCG.

II. Corrective Measures

Feedback received: *ENGIE and Eurelectric note that there is limited real-world experience of the existing Corrective Measures. They request greater transparency around the 17 May decoupling event and stress that Corrective Measures may have significant market-efficiency impacts and should*

therefore be used only as a last resort. They encourage NEMOs and TSOs to consider less disruptive alternatives.

NEMOs response: NEMOs agree that Corrective Measures are exceptional measures and should be applied only when other available mitigations are insufficient or not applicable to protect algorithm performance and market continuity. Their use is governed by the Algorithm Methodology and is intended to be temporary, proportionate and targeted to the circumstances. NEMOs, together with TSOs and the relevant governance bodies, will continue to assess possible mitigations and less disruptive alternatives. Communications on individual operational incidents are handled through the applicable incident-management and market-communication arrangements.