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| **4. When integrating HMMCP for Intraday Auctions, NEMOs propose to follow the same principles as for SDAC. This means a differentiation from HMMCP for the SIDC continuous. What is your view on that differentiation, and do you have a view on what maximum and minimum clearing price should be applied for SIDC IDAs and what mechanism for possible upward or downward adjustment of that maximum and minimum clearing price should be applied?** |
| We are neutral on the technical limits for IDAs. |
| **5. The current methodologies describe a dynamic process to increase the maximum clearing price if market prices reach certain thresholds. NEMOs would like to consult on the possibility to also implement a decrease of the maximum clearing price after a period when no thresholds have been exceeded and the maximum clearing price shows to be unnecessarily high.** |
| We support the introduction of a mechanism to decrease the price to the original level after some time. The monitored period before the return to previous maximum price has to be sufficiently long, e.g. a few months after the increase. |
| **6. NEMOs would like to consult on the duration of the transition period between detection of the threshold and entry into force of the new price cap. Shall this be shortened, increased, or maintained to be 5 weeks after the triggering threshold (60% of max clearing price) has been reached?** |
| This period should definitely be shorter. The current 5 week period is way too long considering the increasingly volatile market, the need to bid at higher prices may not be there 5 weeks from the price spike that triggered the increase in maximum price. We propose the adjustment as soon as possible after the trigger (however, below we also propose that the triggering event should not be a single event in a single BZ), ideally in scope of days. |
| **7. Do you consider the current approach to increase the maximum clearing price in steps of EUR 1000,-- still adequate?** |
| In principle, we do not have a strong position on this point, but it might be worth considering the steps to reflect the actual need for a higher bidding price: e.g. if considering the current maximum price of 4000 €, it is different if the clearing price triggering the next increase is 2400 €, or if the market has been cleared at 3999 €. In the first case, 1000€ step might be sufficient, in the second case, a bigger step may be considered. |
| **8. Do you think that the event that the clearing price exceeds a value of 60 percent of the harmonised maximum clearing price for SDAC in one market time unit of a day in single bidding zone is a sufficient trigger to increase the harmonised maximum clearing price for SDAC? For example: to instead as the basis for triggering a maximum clearing price increase to be given by a requirement that the threshold has been exceeded on multiple different days (e.g. separate SDAC trading days) within a given period.** |

We are neutral on this point, the trigger seems sufficient as long as the clearing price that serves as the trigger was not reached during decoupling of the zone in question or due to technical issues.

**9. HMMCP methodologies to describe also an automatic extension of the minimum clearing price when a certain threshold is reached?**

We do not have a strong position on this point. So far, we have not registered such need for the floor extension.

**10. Any other views regarding the HMMCP methodologies for SDAC and SIDC?**

The methodology should also address the situation where market is cleared at the maximum price or very close to the maximum price (the actual maximum price may not be reached since MPs are aware of the limit so clearing will be e.g. at 3900 €). In this case, large volumes of demand will not be satisfied and will have to be purchased at intraday market. In this case, we propose that all volume restrictions on intraday markets (including national restrictions) be lifted to allow the market participant to balance their positions.

For example, German TSOs limit the volume a market participant without physical generation in Germany may trade in the intraday timeframe (limit on the overall position that would be accepted in the reported diagram), without distinguishing free trading and the trades aimed at closing MPs position not closed in the DA. These limits may prove completely inefficient in a scenario of extreme DA market clearing price, which would leave large volumes of orders unsatisfied and would hence cause large imbalances to be settled in the ID timeframe – in case restrictions prevent the MPs to do that would result in huge imbalances.

If such restrictions on intraday trading will not be lifted, we propose not consider a given MP to be causing imbalance in the MTU where such MP was bidding at the maximum price in DA but sufficient volumes were nevertheless not allocated.