

Energisystem
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The Agency for the Cooperation of Energy Regulators
(ACER)
consultation2017E02@acer.europa.eu

PC_2017_E_02 – Consultation on maximum and minimum clearing prices for single day-ahead and intraday coupling

General comments

Swedenergy, representing 400 companies, is the Swedish joint association for producers, distributors and suppliers of electricity, district heating and cooling.

Swedenergy welcomes the opportunity to comment consultation on maximum and minimum clearing prices for single day-ahead and intraday coupling.

Q1: Do you have any concern with respect to the new proposed automatic adjustment rule for PmaxDA and for PmaxID? If so, please explain thoroughly why.

Swedenergy supports ACER's proposal. The proposed change to a faster adjusted PmaxDA and PmaxID is a big improvement. If the price roof isn't raised in a fast way, that price roof will act as a price cap and it will delay investments in new capacity if/when the prices comes near or over the price roof.

Q2: Which of the three proposed options for the PmaxDA would have your preference? Please explain thoroughly why.

Swedenergy believes it is important that PmaxDA must be high enough not to limit the bidding behavior of market parties.

However, Swedenergy wants to emphasise that second auctions used in DA on some market areas distort the price formation and can act as de facto price limits below the current + 3000 SDAC. Since second auctions also increase the risk for a decoupling, we propose a re-evaluation of the purpose of second auctions, ideally leading to their disappearance. In addition, the second auctions slow down the calculation process and cause further stress for the algorithm.

Q3: Do you have any concern with respect to the new proposed implementation date? If so, please explain thoroughly why.

Swedenergy agrees that the NEMOs shall implement the HMMP for SDAC in Bidding Zones participating in the operation of the SDAC immediately after the MCO function has been implemented in accordance with Article 7(3) of the CACM Regulation. However, Swedenergy would like to clarify this as "and latest 5 weeks after publication of this decision".