

# **REQUEST FOR AMENDMENTS OF THE SPANISH AND PORTUGUESE REGULATORY AUTHORITIES**

**ON**

**Common Spanish and Portuguese TSOs and NEMO  
proposal for complementary intraday regional  
auctions in accordance with Article 63 of  
Commission Regulation (EU) 2015/1222 of 24 July  
2015 establishing a guideline on capacity allocation  
and congestion management**

**17 November 2017**

## I. Introduction and legal context

This document sets out the common position agreed by CNMC and ERSE as competent regulatory authorities, on the proposal for complementary intraday regional auctions for the Spanish and Portuguese bidding zones' submitted jointly by the Iberian TSOs and NEMO (OMIE, REE and REN), in February 2017, in accordance with Article 63 of the Commission Regulation (EU) 2015/1222 of 24<sup>th</sup> July 2015 establishing a Guideline on Capacity Allocation and Congestion Management (Regulation 2015/1222).

The common proposal from the Iberian TSOs and NEMO launched on February 14<sup>th</sup> (within 18 months after the entry into force of Regulation 2015/1222) was subject of consultation from 13<sup>th</sup> February 2017 to 14<sup>th</sup> March 2017 as stated by Article 63(1) of Regulation 2015/1222. (On 24<sup>th</sup> April 2017 the Iberian NEMO and TSOs published the results of the consultation<sup>1</sup>).

The Iberian Regulatory Authorities, after analyzing this proposal, and considering the comments from the stakeholders and other regulatory authorities to the previous proposal, agreed to launch a new public consultation<sup>2</sup> pursuant to Article 63(4)(e) from 28<sup>th</sup> July 2017 until 11st September 2017.

The legal provisions relevant to the submission and approval of the complementary intraday regional auctions proposal and this consultation can be found in Article 63 of the Regulation 2015/1222. They are set out here for reference:

### Article 63 of Regulation EU 2015/1222:

1. *By 18 months after the entry into force of this Regulation, the relevant NEMOs and TSOs on bidding zone borders may jointly submit a common proposal for the design and implementation of complementary regional intraday auctions. The proposal shall be subject to consultation in accordance with Article 12.*
2. *Complementary regional intraday auctions may be implemented within or between bidding zones in addition to the single intraday coupling solution referred to in Article 51. In order to hold regional intraday auctions, continuous trading within and between the relevant bidding zones may be stopped for a limited period of time before the intraday cross-zonal gate closure time, which shall not exceed the minimum time required to hold the auction and in any case 10 minutes.*
3. *For complementary regional intraday auctions, the methodology for pricing intraday cross-zonal capacity may differ from the methodology established in accordance with Article 55(3) but it shall nevertheless meet the principles provided for in Article 55(1)*
4. *The competent regulatory authorities may approve the proposal for complementary regional intraday auctions if the following conditions are met:*
  - (a) *regional auctions shall not have an adverse impact on the liquidity of the single intraday coupling;*
  - (b) *all cross-zonal capacity shall be allocated through the capacity management module;*

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<sup>1</sup>[http://www.omie.es/files/documento\\_respuesta\\_consulta\\_publico\\_1.pdf](http://www.omie.es/files/documento_respuesta_consulta_publico_1.pdf)

<sup>2</sup> <https://www.cnmc.es/ambitos-de-actuacion/energia/consultas-publicas>

- (c) the regional auction shall not introduce any undue discrimination between market participants from adjacent regions;*
- (d) the timetables for regional auctions shall be consistent with single intraday coupling to enable market participants to trade as close as possible to real-time;*
- (e) regulatory authorities shall have consulted the market participants in the Member States concerned.*

5. *At least every two years after the decision on complementary regional auctions, the regulatory authorities of the Member States concerned shall review the compatibility of any regional solutions with single intraday coupling to ensure that the conditions above continue to be fulfilled. 25.7.2015 L 197/63 Official Journal of the European Union EN*

## II. The NEMO and TSO common proposal

The common NEMO and TSOs proposal, for the introduction of intraday complementary auctions, consists of a hybrid operating model based on the integration of the European XBID continuous intraday market complemented with Iberian implicit auction sessions.

Two alternative models are considered regarding the organization between the Iberian implicit auctions and the European continuous intraday market:

**Model A:** Trading on the continuous market is considered for the trading periods prior to the horizon of the next implicit auction to be held, that is, those periods in which no further trading will be made at any implicit auction.

In order to minimise the changes to systems and procedures, and simplify the implementation of the continuous intraday market model, the auctions will have, at least initially, almost exactly the same operating procedure as MIBEL's current auctions.

**Model B:** Trading on the continuous market is considered throughout all the periods in the current day (except for the next one) and, after Intraday Cross-Zonal Gate Opening Time, also for the trading periods on the following day. Pursuant to article 63 of Regulation 2015/1222, and in order to consider for trading the cross-zonal capacity at the ES-PT interconnection at the implicit auction trading sessions, while the implicit auction's matching process lasts, the continuous intraday market will be stopped in the Iberian bidding zones. This period should last 10 minutes at the most, prior to the end of the hour (between hh:50 and hh+1:00) according to Article 63(2) of Regulation 2015/1222. Continuous trading is restarted once the auction's matching process has ended.

## III. Regulatory Authorities Consultation

On the consultation the Iberian Regulatory Authorities requested the stakeholders' opinion on the general proposal about the "New MIBEL Intraday Model" and also on these specific following elements:

1. Period of time to evolve from Model A to Model B
2. Number of auctions
3. Timetable of the first ID auction and for the intraday gate opening time for continuous trading (IDCZGOT) in SWE.

#### 4. Physical market versus portfolio market

Apart from the French National Regulatory Authority (CRE), the consultation received a total of 1 responses from different kind of participants:

Big consumer's representative: Fortia  
Independent suppliers association: ACIE  
Agents' Associations acting on behalf of third parties: ARMIE  
Iberian integrated stakeholders: Viesgo, GNF, EDP y EDP España, Iberdrola, Endesa  
French integrated stakeholders: EDF, EDF Trading  
French Transmission System Operator: RTE  
The European Federation of Energy Traders EFET  
Other Participants: REN Trading

The non-confidential answers to the consultation can be found as an Annex at the end of the document.

### **IV. Iberian regulatory authorities' position**

After a careful analysis of the Iberian TSOs and NEMO's common proposal for complementary intraday auctions of the ES-PT border, and the responses to the public consultation, the Iberian Regulatory Authorities have agreed on a common position on the relevant features of the design of the complementary auctions. Iberian Regulatory Authorities have elaborated this opinion taking into account the consistency with the requirements set out in Article 63 of Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management (CACM) and the objectives defined in Article 3. The details of the request for amendment is explained in this section.

#### **1. On the transitional period**

After a careful analysis of the two models included in the operator's proposal, Regulatory Authorities consider the Model B as the selected target model. This model is preferable in order to maximize the number of hours in which different periods are tradeable in the continuous market.

Model B is also in line with Iberian Energy Regulators view that the organization of auctions should not impact the possibility for trading subsequent hours in the continuous trading environment, in order to avoid a fragmentation of continuous trading.

In the public consultation, Iberian Regulatory Authorities considered a transitional period using model A, which means keeping the current number and schedule of the Iberian intraday auctions, where the continuous intraday trading is permitted for the trading period prior the next intraday regional auction implicit auction to be held.

There are different views from the consult respondents, ranging from ones who asked this to be the permanent model or at least during 12-18 months, some others asking for a short period of 2-6 months, and others asking for no transitional period where continuous trading is allowed for the all 24 hours of day D once it is open.

Given the lack of experience with continuous trading of the Iberian stakeholders, and the short term target of the Iberian market to be part of the first go-live of continuous trading module XBID in the first quarter of 2018, Iberian Regulatory Authorities understand the need for this transient period in order to let market players enough time to adapt their internal procedures and systems and to prepare their staff who operate on the continuous intraday market. In order to align the final design with the Article 59(4) of CACM regulation the soonest possible, and with the general view of all regulatory authorities coordinated through the CACM TF on all TSOs' Proposal for the 'single methodology for pricing intraday cross-zonal capacity' in accordance with Article 55 of CACM regulation, the duration of this transient period should not be longer than 12 months.

## 2. On the interruption of the continuous trading and the number of intraday regional auctions of model B

According to Article 63(2) of CACM Regulation, in order to hold complementary regional intraday auctions '*continuous trading within and between the relevant bidding zones may be stopped for a limited period of time before the intraday cross-zonal gate closure time, which shall not exceed the minimum time required to hold the auction and in any case 10 minutes*'. In line with this provision, it is compliant with the CACM Regulation that the continuous trading may be stopped in the Spanish and Portuguese bidding zones for a limited period, during which other European bidding zones would not have access to the Iberian bidding zones.

At the same time, pursuant to Article 63(4)(c) of CACM Regulation, there is a need to avoid undue discrimination between market participants from adjacent regions.

Once the model B is implemented, although it is technically possible not stopping the continuous trading in the Spanish and Portuguese bidding zones while regional auctions are taking place, Iberian Regulatory Authorities have considered it better to stop the continuous trading in both bidding zones for a limited period of time in order to avoid liquidity split inside of each bidding zone and to ensure non-discriminatory treatment among market participants. This solution is non-discriminatory as continuous trading in Iberian borders is closed to both Iberian and European market participants, and opens at the same time for all European stakeholders.

With the existing auctions timetable at least intraday sessions 3 to 6 would interrupt continuous trading while for sessions 1 and 2 that will depend on the definition of the gate opening time of intraday continuous trading. Regarding the number of auctions to be held, there have been different views from the respondents. From keeping just the first one as an opening auction, or the first two auctions, to having a third extra one on day D, or keeping the whole 6 auctions.

Having regard that CACM methodologies for intraday capacity pricing and Intraday Gate Opening Time are currently under discussion, and there isn't previous experience on continuous intraday market for Iberian participants, Iberian regulators consider reasonable not to redefine yet the current number of auctions. In the light of CACM implementation and the acquired experience, Iberian Regulators will assess the necessity of reducing the number of auctions no later than 12 months after the implementation of model B or as soon as these methodologies are approved.

## 3. On the first auction and the intraday gate opening time (GOT)

The Iberian Regulatory Authorities, as stated in the consultation, would deem a step back to delay the time for the first intraday complementary auction, considering that during a lot of years, the Iberian stakeholders have been able to efficiently adjust their positions in the first intraday market until 18:45 CET of day D-1. Therefore, the Iberian Regulatory Authorities consider the importance of keeping the first two auctions in day D-1, with similar timetables as the current one. However, auction opening time on day D-1 will have to be adapted to the CACM methodologies for intraday

capacity pricing and Intraday Gate Opening Time currently under discussion, as mentioned before.

#### 4. On the 'unit market bidding' VS 'portfolio bidding' models

The Iberian market has been designed from the beginning as a physical market, and not as a market based on trading portfolios where integrated stakeholders would offer to market only their net positions. This design has provided a high level of transparency to the performance of the market as well as a level playing field between vertically integrated agents and independent ones. Iberian Regulators considered important to assess if to keep this design in the intraday market could provide the same benefits for the Iberian market. To that end, it has been consulted and assessed if a local link between each block bid submitted to the continuous trading, and the corresponding bidding unit (as defined for day ahead), should be established ('unit market bidding').

Again, the respondents have different views on this issue. Big consumer's representative and Independent suppliers association prefer to keep the 'unit market bidding' model as it would provide a better level of transparency. They consider that introducing portfolio orders could represent a step back in terms of competition and transparency as it will benefit large generators in detriment of new entrants or non-vertical-integrated companies. They also deem that the 'unit market bidding' model do not imply extra complexity to the Iberian stakeholders. They also ask for an ex-post identification of units in case a portfolio model is finally selected.

On the contrary, the Iberian integrated companies as well as EFET and Agents' Associations acting on behalf of third parties prefer to be allowed to use a 'portfolio bidding' model. They consider that the 'unit market bidding' model would introduce a higher complexity that will hinder the formation of competitive bids, and the exchange of energy between the generation units of the same agent. They also consider that a 'unit market bidding' model would be discriminatory for the Iberian agents compared to the rest of European agents. Regarding the transparency concerns, they deem that the supervision of the nomination process will be enough to provide a good level of transparency as it happens in the other European countries.

The Iberian Regulatory Authorities consider that a limited capacity of supervision is inherent to the continuous trading model, since it is based on a pay as bid model. Additionally, given that in a continuous trading, the price is settled according to the order which was left first on the market, the price submitted by the counterparty doesn't necessarily provide a relevant information.

They also consider that a highly complex bidding model could hinder the participation of the Iberian stakeholders in the intraday continuous market compared to other European participants, which is particularly relevant in a model where quick response from participants can be required.

Having regard the above-mentioned reasons, the Iberian Regulatory Authorities consider that intraday continuous market participants should be allowed to trade using portfolio bids while participation in regional intraday auctions as well as in the foreseen pan European auctions shall be based on a 'unit market bidding' model.

However, in order not to lose the advantages provided by the physical character of the Iberian market, in particular, a high level of transparency, an ex-post identification of units must be

implemented in the intraday continuous trading. Moreover, in order to keep a level playing field between large market participants and small ones, it is important to ensure that any variation of generation plants and consumption units must be traded through the market and not just identified in the nomination process directly to the TSOs as it could happen if portfolio is permitted without any other limitation. To that end, Iberian Regulatory Authorities consider that the aggregation of buying (selling) transactions in the continuous intraday market for each market time unit must be disaggregated into one or several buying (selling) individual units (as defined for day-ahead bidding), once the trading period is over.

Finally, in order to keep a level playing field between vertically integrated agents and independent ones, portfolio units should be defined in order to trade separately generation bids from consumption bids, and selling bids from buying bids.

Additionally, in order to ensure a good level of transparency, the Iberian Regulatory Authorities also consider that intraday continuous market participants, for supervision purposes, should inform, directly or indirectly, the result of the continuous intraday market and the ex-post disaggregation process to the national regulatory authorities.

## 5. Actions

Based on the above rationale, Iberian Regulatory Authorities agree to request an amendment to the proposal for complementary intraday regional auctions for the Spanish and Portuguese bidding zones.

This amendment should contain the following elements:

1. Model B is the selected target model.
2. A transient period with Model A should not last more than 12 months.
3. The current number and timetable of auctions should not be redefined yet as they will have to be subject of a future assessment to be adapted to the foreseen approved CACM methodologies for intraday capacity pricing and Intraday Gate Opening Time.
4. Intraday continuous market participants should be allowed to use portfolio bids, trading separately generation bids from consumption bids, and selling bids from buying bids. These portfolios will have to be disaggregated, once the trading period is over, into one or several individual units (as defined for day-ahead bidding).
5. It should be ensured that Iberian Regulatory Authorities receive, directly or indirectly, information regarding the nomination process of the energy matched in the continuous intraday market.

## **Annex: non confidential responses to the consultation**



## **GAS NATURAL FENOSA COMMENTS ON PUBLIC CONSULTATION FOR COMPLEMENTARY INTRADAY REGIONAL AUCTIONS FOR THE SPANISH- PORTUGUESE BIDDING ZONE BORDER**

Sent to:

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Gas Natural Fenosa welcomes the opportunity to comment on the Iberian Regulatory Authorities Position about the common TSOs and NEMO proposal for the introduction of intraday complementary auctions, consists of a hybrid operating model based on the integration of the European XBID continuous intraday market complemented with Iberian implicit auction sessions.

Hereby we would like to comment on the following three points:

- We agree that model “B” is preferable in order to reinforce the continuous market and this model should be implemented as soon as possible. Model “A” should be consider only as transitory and just to be able to take part of the first go-live phase of the European XBID project.

We do also agree on that, once the Model “A” is implemented, it will be necessary to reduce the number of regional auctions, leaving finally only one single opening auction before starting ID continuous trading.

- We consider that it is necessary to harmonize the gate opening and closure times for cross-border intraday trading in Europe. However, the proposal to set the Gate Opening Time (GOT) in XBID at 22:00 of D-1 in the SWE region is a step-back from the current situation in the region.

We believe that the GOT should be set earlier in the afternoon of D-1, immediately after the Opening Auction (20:00) and keep in the meantime the present time for the two first auctions

- We defend a cross border intraday market design as simply as possible, leaving the agents the possibility of using any kind of bid units and nominating directly to the TSOs.

The Continuous Intraday Market is a voluntary market, where agents can participate to adjust production and consumption programs. There is no obligation to offer all available physical capacity, so we don't clearly understand the need and benefits of establishing a local link between each block bid submitted to the continuous trading and the corresponding physical unit.

But, in any case, the nomination process is the link between the operations in the ID and the physical programs of each portfolio.

The Market Supervisor can check all the differences between the dispatching after the mandatory Day-Ahead Market and the last program before real-time / balancing market, because all information will be available immediately after each nomination to the TSOs.

On the other hand, the mandate to present bids by physical unit would be very questionable because it would be an operational limitation to the Iberian agents without a clear justification.

First, all European markets participants have the possibility to present portfolio bids in order to be more competitive while the Iberian agents should be obliged to specify the unit of supply at the intraday continuous market. This measure would constitute a clear discrimination with the other market participants, who can freely choose to offer their physical units in the most appropriate way, without any operational limitation.

But the important thing is that the imposition of associating each bid with a physical unit, apart from the discrimination to the Iberian producers, presents several operational problems and increases the systems costs as, for example:

- The impossibility of adjusting programs between the units of the same agent without having to go through the market, simply communicating the adjustment in the nomination to the TSO, avoiding costs and possible operational errors and maintaining the absolute transparency of the operation.
- The possibility of structuring more complex and competitive bids by adding several physical units is also lost. In some cases, several units could be matched in the market together but not disaggregated.

The market rules should establish the freedom for each agent to operate with as many bidding units as he considers necessary (and reporting and associating afterwards to the TSO the physical units to each bidding unit). The only limitation should be always offering an amount less or equal to the sum of the capacity of the physical units associated with the portfolio.

## **Observaciones de Endesa a la consulta conjunta de la CNMC y ERSE sobre el mecanismo de Subastas Regionales Intradíarias Complementarias para las fronteras de las ofertas España-Portugal**

**11/09/2017**

Endesa valora positivamente la consulta pública a los agentes, y dentro del plazo establecido para responder, traslada las siguientes observaciones:

### **MODELO**

Respecto a las opciones de funcionamiento del mercado intradiario híbrido, Endesa considera más adecuado el modelo identificado como “B”. Es decir, aquel en el que se abren a negociación todos los periodos del día en curso (a excepción del próximo) y, una vez abierta la negociación en la tarde anterior, también los periodos de negociación del día siguiente.

En el medio plazo el modelo A puede resultar menos flexible en tanto que sólo se abren a negociación en XBID los periodos previos a la próxima subasta implícita que se ejecute. En este sentido, el modelo B ofrece mayor flexibilidad al no limitar los periodos de negociación y permitir acceder a todos los periodos de negociación del día en curso (menos el próximo) y los del día siguiente una vez que se abra. De alguna forma, el modelo A está también incluido en el modelo B, por lo que se considera conveniente la implantación en el medio plazo del modelo B.

Sobre este modelo, Endesa plantea comentarios adicionales.

### **EXISTENCIA DE SUBASTAS EN EL INTRADIARIO**

Teniendo en cuenta la directriz del CACM acerca de la necesidad de contar con una metodología que permita poner precio a la capacidad disponible de las interconexiones, es apropiado contar con un modelo híbrido que compagine unas subastas intradiarias con un mercado continuo.

Éstas deben tener un alcance similar a la actual casación del mercado diario, el cual permite poner precio a la capacidad a través de la renta de la interconexión como resultado de la casación.

En un principio, y hasta que se conozca o decida el número de sesiones de intradiarios y en qué horas son necesarios para poner precio a la capacidad a nivel europeo, se podrían mantener las 6 subastas intradiarias ibéricas actuales y compagnarlas con el mercado intradiario continuo.

Más adelante habrá que homogeneizar el número de subastas intradiarias ibéricas con las subastas intradiarias europeas, ya que las transacciones del día estarán garantizadas por el mercado intradiario continuo.

### **PERÍODOS DE NEGOCIACIÓN**

Por otra parte, se considera necesario poder contar con periodos de negociación en el mercado intradiario continuo lo más amplios posibles para poder realizar en cualquier momento las operaciones que los agentes estimen convenientes para cualquiera de las horas restantes del día, de igual forma que actualmente se pueden negociar en las subastas intradiarias.



## OFERTAS POR CARTERA

Queremos manifestar nuestra oposición a la propuesta de que la negociación en el Mercado Intradía Continuo se realice por unidad de oferta y no por cartera, que es la forma en que se negocia en los mercados europeos donde ya se encuentra funcionando.

Adicionalmente, en la Unión Europea se está intentando crear un mercado en cuyo marco de referencia, todos los participantes puedan competir con unas reglas que permitan la igualdad de condiciones.

En concreto, el diseño del mercado intradía europeo se crea con esta vocación, de tal forma que los bloques de energía sean aprovechables de un extremo geográfico a otro en el ámbito de la Unión.

Los países de nuestro entorno geográfico más próximo, y en concreto Francia, contempla la posibilidad de oferta por portfolio en bloques de energía, lo que proporciona a los agentes una mayor flexibilidad y eficiencia en costes, sin merma alguna de la transparencia del mercado ni de la seguridad del sistema eléctrico.

La obligación de ofertar por unidades impedirá a los agentes de España participar en las mismas condiciones que el resto de agentes de la UE, colocándolos en una situación de desventaja en términos de flexibilidad y costes.

## APERTURA DEL MERCADO INTRADIARIO

Estamos de acuerdo con que en el MIBEL la hora de apertura del mercado intradía sea anterior a la de la *“Propuesta conjunta de los TSOs en relación con IDCZGOT (22:00)”*, si no, se estaría dando un paso atrás con respecto a la situación actual en el MIBEL.

## IBERDROLA'S OPINION<sup>1</sup> ON COMPLEMENTARY INTRADAY REGIONAL AUCTIONS FOR THE SPANISH-PORTUGUESE BIDDING ZONE BORDER

(RESPONSE TO THE PUBLIC CONSULTATION LAUNCHED BY THE MIBEL NRAS FOLLOWING THE OMIE-REE-REN "OPERATING PROPOSAL FOR THE INTRADAY MARKET IN MIBEL")

11 SEPTEMBER 2017

Iberdrola welcomes the opportunity to explain to the competent regulatory authorities CNMC and ERSE its concerns on the so-called "New MIBEL Intraday Model" in the confident belief that it will guarantee that no discrimination of Iberian market players within the XBID is *de facto* imposed by the design decisions.

### **Comments on the target model of the MIBEL Intraday Market**

Iberdrola advocates the following key features of the MIBEL Intraday Market:

- ✓ **Portfolio bidding with direct and flexible nomination to TSOs must be allowed in the continuous market from the *go-live*.** Unit-based bidding can constitute a major operational barrier<sup>2</sup> that would dramatically decrease the trading opportunities for the bulk of the Iberian market players. We urge NRAs to preserve the so-called "level playing field" with a European level perspective. In this respect, we consider important to note that necessary transparency of the market trades shall be based on the nominations and on a change in drivers and practices used for the monitoring of MIBEL by NRAs.
- ✓ **We support the removal of all regional auctions during day D from the *go-live*, keeping only one regional opening auction at day D-1, the one cleared just after the day-ahead market, but only covering day D horizon.** Complementary regional auctions must not represent an obstacle for the launching of the pan-European continuous intraday market. If the so-called "Model A" is finally imposed for "pragmatic" reasons, we support a fast move to pure continuous market with only an opening auction. The transitional period envisaged by NRAs in the consultation paper – from 12 to 18 months – seems adequate.

It is important to note that **these two features must be considered jointly for the sake of a consistent and efficient intraday model in MIBEL.** We think that this could not be achieved if the regulatory decision is finally supporting a continuous market with mandatory unit-based bidding together with the removal of (all or several) auctions within day D. Moreover, the model with an opening auction and portfolio bidding can provide NRAs with **the mean to assess the real performance of the pan-European continuous intraday market in the MIBEL from the beginning** with commonly used indicators, as other NRAs in Europe will do.

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<sup>1</sup> This response to the consultation can be considered non-confidential by the NRAs.

<sup>2</sup> How can be efficiently managed trading opportunities in two bidding zones with several units each one? How to achieve efficient matching of bids when they are not compatible with each unit' physical limitations?

Furthermore, it is important to note that some key features of the European regulation on the Intraday Model are still open. In this respect, **we support an IDCZGOT set in the SWE region at the earliest possible time**, according to “All NRAs” decision on this matter, as the consultation paper reflects. Moreover, **the TSOs’ proposal on setting at 22:00 the deadline for bid submission for the pan-European Intraday Auction (IDA) in day D-1 should be reviewed**<sup>3</sup>. This deadline must not be an “umbrella” parameter for the countries not aligned with the European best practices, therefore we urge all NRAs to ask TSOs for a compromise solution between their operational constraints (i.e. related to capacity calculation<sup>4</sup>) and the benefits to achieve a homogeneous pan-European Intraday Model without regional particular features. **This would make possible an easy transition from a sole regional opening auction at MIBEL to the pan-European IDA** currently proposed, if the latter is finally approved and implemented in the mid-term.

### **Comments on the regulatory process**

We stress the importance of assuring **legal certainty to market participants** sufficiently in advance in order to develop its internal processes and tools. This is important in order to be ready for the *first wave of the XBID go-live*, planned before the end of Q1 2018. As we get closer to the date, we do not have any binding decision on the detailed design and certain regulatory processes already launched seem to be unconnected with the rest, like the OMIE market rules developing the unit-based bidding in the continuous market, opposite to the joint OMIE-REE-REN proposal, and before the completion of the current CNMC-ERSE consultation.

Therefore, we consider that **“Request for Amendment” (RfA) has to be issued by the NRAs in a timely manner and sufficiently detailed to foster subsequent regulatory processes** (OMIE market rules, TSOs Network Codes, other pieces of legislation).

Moreover, we suggest NRAs to provide a **detailed analysis of the compliance of the MIBEL Intraday Model with CACM provisions**<sup>5</sup> after due consideration of the comments received in the consultation, as part of the RfA itself.

Furthermore, we propose to include in the RfA **a specific mandate to the NEMO and TSOs to develop its regulatory proposals with the aim to be prepared for any envisaged evolution of the design of the market in the short and medium term**. Transitional arrangements can be approved to allow implementation of certain provisions at precise future deadlines.

We think that all these proposals are the mean of paving the way for a proper implementation of the new MIBEL intraday market, as the lack of regulatory coordination is often one of the main obstacles to a proper evolution of our regional market design.

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<sup>3</sup> This deadline and potential regional auctions held before the market opening would drain the liquidity in the first time periods of the day D within the pan-European IDA (aiming to price the ID capacity).

<sup>4</sup> Please refer to Capacity Calculation Methodologies consulted by CCR during this summer and the one of the SWE region in particular.

<sup>5</sup> In addition, those related to limits in bid prices currently in force in the MIBEL, also in light of the Clean Energy Package.

Madrid, September 11th 2017

**ACIE COMMENTS TO THE *PUBLIC CONSULTATION FOR COMPLEMENTARY  
INTRADAY REGIONAL AUCTIONS FOR THE SPANISH-PORTUGUESE  
BIDDING ZONE BORDER***

Dear Sirs,

In response to the afore mentioned consultation, we would like to first of all state our concern about three matters that we will try to explain in our concrete answers here after:

- **The proposal for the Iberian continuous intraday market rules is delayed as regards to:**
  - **The experiences in cross border continuous intraday trading of other relevant electricity markets in the UE (mainly Germany and France) that started on December 2010.**
  - CAMC European Regulation was approved on July 2015 and the first planning for implementation in the EU of cross border continuous intraday trading through the so-called XBID solution aimed at December 2015.
- **Furthermore, the current proposal describes a model that does not observe the CACM European regulation** because it does not allow a real continuous negotiation based on an electronic market platform. The reason for such a provisional defective option is that it is necessary to start now with a transient model because the lack of time to develop a proper one. In our opinion OMIE should get the right model straight forward at any cost. Consequently any transitory period should be kept to a maximum of 2 months.
- **The under utilization of the real cross border capacity based on the lack of information about the evolution along the day of the EU interconnectors capacity.** TSOs, as it is necessary to preserve the security of the electricity systems evaluate in a continuous manner the capacity of the interconnectors owned by them an exchange at least every hour their best evaluation for the periods to come. In spite of that, the SWE TSOs (RTE, REE and REN) will only refresh intraday capacity calculation for the market participants once per day. Since they must be certainly assessing such a capacity in real time basis in order to fulfil their obligations, we do believe that the regulation should include the obligation to release all available capacity with at least a similar pattern.

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You can find here under our comments to the specific questions posed in the consultation paper:

1. The so-called A-Model clearly goes against the target of the CACM regulation as it would highly discriminate Iberian market players. Furthermore, 25 % of the delivery period, corresponding to the hours heading each one of the six auction slots, would only be negotiated a bit more than half an hour, as per the proposal for market rules submitted by the Iberian market operator to market players on July 18th. We do believe that in such conditions the Iberian Market can't afford a transient period of between 12 and 18 months until the B-Model is implemented. If the transient period was set to last more than two months we would prefer not to kick-off the Iberian continuous intraday trading with the European XBid mainstream in Q1 2018 because it would be indeed a way of hiding the lack of readiness of the Iberian market, and we would rather intensively work to join with a proper model straight forward as soon as possible.
2. Given the fact that the so-called B-Model would still withdraw 10-minute negotiation time in the intraday continuous trading for each one of the six existing auctions, we also believe that it would be appropriate to drop off much of them as soon as possible. It sounds sensible to gather the two ones proposed by the regulators in the consultation paper.

We would like however to take advantage of this consultation to state something that has arisen deep concern in our association regarding a key aspect in the development of a real European intraday continuous market as the cross zonal capacity calculation is. In our view this issue has not been properly targeted by TSOs. The Intraday Capacity Pricing Methodology quoted in this consultation paper foresees two capacity auctions to price and allocate this capacity. This methodology will at the end of the day entirely allocate the cross zonal capacity through the implicit auctions. It clearly goes against the CACM Regulation which states ***“Capacity should be allocated in the day-ahead and intraday market time-frames using implicit allocation methods, in particular methods which allocate electricity and capacity together. In the case of single day-ahead coupling, this method should be implicit auction and in the case of single intraday coupling it should be continuous implicit allocation”***.

Furthermore, the three TSOs within the SWE CCR (REE, Ren and RTE) have very recently submitted to market stakeholders a proposal for intraday capacity calculation which sets up one only capacity calculation by 22:00 day ahead.

It would be a shame that after all the outstanding efforts and expensive investments run so far, the forthcoming European intraday continuous trading was to be indeed a raw of local isolated intraday continuous trading because of this shy approach from TSOs in this essential aspect of capacity calculation. We kindly ask more efforts in this regard.

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3. Finally, we agree with regulators that transparency, which we deem crucial in an oligopolistic context as the Iberian one, will be better preserved with a unit based bidding mechanism than with a portfolio based negotiation. We then very much welcome the NRAs solution for this matter.

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## COMENTARIOS DE LA ASOCIACIÓN DE REPRESENTANTES DEL MERCADO IBÉRICO DE ELECTRICIDAD (ARMIE) A LA CONSULTA PÚBLICA PARA LAS SUBASTAS REGIONALES INTRADIARIAS COMPLEMENTARIAS PARA LA FRONTERA ESPAÑOLA-PORTUGUESA

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Dña. M<sup>a</sup> Belén de la Fuente Bueno, en nombre y representación de la Asociación de Representantes en el Mercado Ibérico de Electricidad (en adelante ARMIE), en su condición de Presidenta de la Asociación (Se acompaña como Anexo 1 certificación de su designación),

### Expone

- Que la Asociación de Representantes en el Mercado Ibérico de Electricidad (ARMIE) agrupa a la mayoría de las empresas que prestan servicio de representación de terceros en el mercado de electricidad. Todos los asociados son agentes activos en el mercado diario e intradiario, por lo que es para nosotros de vital importancia todo lo que se defina a este respecto.
- Así, agradeciendo el que se nos permita participar, y con la intención de colaborar en la definición del funcionamiento del mercado intradiario

Realizamos los siguientes comentarios:

En primer lugar, indicar que el modelo A, se aceptó como una solución transitoria y no definitiva, por tanto, entendemos que toda la normativa: Reglas del Mercado, Procedimientos de Operación, Reales Decretos, etc. ya deberían ser redactadas según el modelo B.

Por otro lado, para poder sincronizarnos lo antes posible con el resto de Europa, el **periodo transitorio** del modelo A debe ser lo más corto posible. Estimamos que lo óptimo sería alcanzar la operativa según el modelo B en un periodo no superior a **6 meses desde la implantación del modelo A**, es decir septiembre de 2018, para evitar así estar en desventaja a nivel operación con el resto de Europa

Además de lo anteriormente comentado, enfocamos nuestro análisis desde 3 puntos básicos a tratar:

### **SUBASTAS**

Si el objetivo es no restar liquidez al mercado intradiario continuo y jugar en el mismo campo de juego que el resto de agentes de mercado europeos, a priori parece razonable el tener sólo la sesión intradiaria común Europea de las 22:00h del D-1 propuesta por los TSO's, aunque no estamos en contra de mantener también nuestra primera subasta intradiaria del D-1 (apertura a las 17:00h y cierre a las 18:45h).

Respecto al resto de subastas, entendemos que en el marco de un mercado intradiario continuo bajo el modelo B, ya no tendrían cabida las demás subastas (3, 4, 5 y 6), ya que complicarían la operativa en gran medida debido a que habría que suspender durante un tiempo el mercado intradiario continuo, lo que nos haría estar en desventaja frente al resto de Europa.

### UNIDADES DE OPERACIÓN

En opinión de ARMIE, para operar en el mercado intradiario continuo debería dejarse **libertad** a los **agentes** para operar bajo **unidades de oferta** o bajo **unidades portfolio**. Entendemos que esta flexibilidad es necesaria para cubrir así las necesidades de todos los agentes participantes de agilidad, operatividad y sistemas, manteniendo la transparencia.

Basamos nuestra opinión en que como apuntan los reguladores en el papel de la consulta, el mercado fue diseñado en el principio como un mercado físico. Fue un mercado de pocos agentes y pocas unidades físicas de generación y de consumo. Después de casi 20 años el mercado ha cambiado de manera radical, tanto en el número de unidades físicas que participan como en las necesidades operativas de estas unidades, en las que la generación intermitente, muy atomizada, necesita estar constantemente ajustando sus programas a sus nuevas previsiones. Esta nueva estructura de mercado, junto con la implantación de un mercado intradiario de negociación continua, que requiere de un seguimiento constante de precios y volúmenes para cada una de las horas y para cada unidad de oferta, genera nuevas necesidades operativas que obligan a operar en base a unidades de cartera si queremos que el mercado intradiario continuo sea operativo y alcancemos el objetivo de un ajuste de programas mejor que el que tenemos actualmente.

Además, la no disposición de unidades de cartera, aumenta el riesgo operativo y de desvío para agentes con gran número de unidades de oferta justo cuando los ajustes exigen mayor urgencia, en las horas más cercanas al tiempo real que serían las únicas que el modelo de mercado A dejaría operar.

Por otro lado, la transparencia que requiere el mercado y apuntan los reguladores como un hecho conseguido con la operativa de unidades de oferta, se mantendría, en nuestra opinión, inalterada con el uso de unidades de cartera para el mercado intradiario continuo. Actualmente los agentes que quieren cruzar operaciones entre sus propias unidades lo pueden hacer en contratos bilaterales que no desvelan precio al mercado o utilizar las subastas de los mercados intradiarios para pasar programas de unas unidades a otras sin que el precio fijado sea relevante porque es el mismo al que se vende y se compra. La nominación final de las posiciones de unidades de cartera revelará las unidades dispuestas a programar a los precios cruzados en el mercado. Esta nominación debe permitir, al menos, el reparto de las operaciones realizadas de compra y de venta de manera separada.

Por todo lo expuesto, entendemos que el contemplar la operativa en el mercado intradiario continuo tanto a nivel portfolio como a nivel de unidad de oferta queda debidamente justificado.

Sin embargo, la operativa en las subastas no debería cambiar, pues es ya un sistema que todos los agentes tienen implantado, por lo que es conveniente seguir operando a nivel de Unidades de Oferta.

## INFORMACIÓN A DISPOSICIÓN DE LOS AGENTES

Además de la información que ya está prevista en el borrador de las reglas del mercado y en los Procedimientos de Operación de REE (ficheros pibci, pibcic, phf, 190, p48, etc.), consideramos de vital importancia para una operación transparente y en igualdad de condiciones para todos los agentes añadir a los anteriores la siguiente información:

- Que los TSO's **actualicen** de forma **continua** la **capacidad** de las **interconexiones** al objeto de optimizar el uso de las mismas y fomentar el efectivo acoplamiento de los mercados a nivel europeo en el intradiario continuo.
- Que los TSO's pongan a disposición del mercado, **información** relativa al uso de la **regulación secundaria**, de **indisponibilidades** de corto plazo y **caídas de centrales**, porque esa información solo la tendrán las zonas de regulación y será importante para la evolución del precio en las horas de mercado continuo antes del tiempo real
- Que se publique toda la información que es introducida en la plataforma, es decir, tanto los **deals casados** como todas las **ofertas que aparecen en pantalla** con su **hora de entrada y salida** aunque estas **no** hayan sido **casadas**. Toda esta información daría total transparencia al mercado intradiario continuo, siguiendo con la senda de información publicada en las subastas, de las que se publica toda la curva agregada de ofertas de compra y venta, y no solo la de las ofertas casadas. Al ser esta toda la información disponible en la plataforma, existiría una total transparencia.
- En cuanto a la definición de un **precio de referencia** o un índice de precios del mercado intradiario continuo, entendemos que es un precio al que todos los agentes del mercado son sumamente sensibles. Por ello, pedimos que se cuente con el **consenso de todos los agentes de mercado**, porque su creación puede generar obligaciones de precio con terceros que sean imposibles de alcanzar sin riesgo. Por el contrario, en la propuesta de modificación de reglas de mercado que ha realizado OMIE, se incluye la publicación de un precio de referencia cuyo objetivo no se ha explicado, ni tampoco su cálculo detallado.



Dña. M<sup>a</sup> Belén de la Fuente Bueno  
Presidente  
ARMIE



## **Public Consultation:**

**Complementary intraday regional auctions for the Spanish-Portuguese bidding zone border**

**Comments document**

September 2017



## **EDP Energias de Portugal S.A.**

### **1. General remarks**

EDP Energias de Portugal S.A. welcomes the opportunity to comment on the proposal for the introduction of the MIBEL continuous intraday market in the context of the European XBID project.

EDP supports Iberian efforts and progress so far to take part in the first phase of the European XBID project.

However, EDP expects that the full benefits of the integration of pan-european intraday markets through the XBID platform may only be reaped by Iberian Market Players if adequate reforms of the Iberian intraday market are accomplished. These reforms will also be necessary in view of the upcoming integration of balancing markets once the Electricity Balancing Guideline will be adopted.

As a stepping stone of the necessary reforms, EDP restates that under the continuous trading framework, multiple Iberian intraday auctions must not be held. The perpetuation of multiple intraday market auctions in addition to the continuous trading mechanism as prescribed by the European Target Model hinders its full implementation and limits the beneficial impacts for Iberian market participants for a number of reasons outlined below.

Although it may be acknowledged that the Guidelines on the Capacity Allocation & Congestion Management Code (CACM) open the door to both regional auctions and a single methodology for pricing intraday cross-zonal capacity, this solution risks undermining the effectiveness of XBID as a cornerstone for allocating intraday capacity efficiently and closest to real time, as enshrined in the CACM Guideline.

The note of discord of EDP regarding the coexistence of multiple regional auctions with the continuous intraday market is mainly due to major unfavourable impacts on continuous trading:

- Multiple regional auctions risk splitting market liquidity and hampering the development of an efficient continuous intraday trading;
- Regional auctions limit the availability of continuous trading only to blocks that were already auctioned thereby reducing opportunities for an efficient adjustment of positions on a continuous basis; effectively, XBID continuous trading must be suspended during auctions;
- Discrimination between market participants will become effective in so far as their geographical location and generating technology are concerned, particularly in relation to special regime market participants.



## **EDP Energias de Portugal S.A.**

EDP underlines that complexity in the design of cross-border intraday markets should be avoided in order to attract market participants and foster liquidity.

Therefore, EDP advocates a solution as simple as possible for the intraday trading procedure based on portfolio bidding in a continuous market where positions are subsequently and directly nominated to the TSO, in line with market procedures in place in other intraday markets within the CWE region.

In order to set the price of the cross-border capacity, one opening auction could be considered acceptable provided that it would not distort the functioning of the market to a significant extent.

### **2. EDP comments on the two model options proposed**

EDP considers both Model A and Model B to be very far from the preferred solution outlined above as well as from the spirit of the *CACM Guidelines*.

Notwithstanding the major objections, and despite all its shortcomings, Model B entails less deficiencies mainly because it would allow market participants to trade sufficiently in advance of real time by enabling all 24 hours of the day to be negotiated with a minimum of restrictions as per the scheduled intraday auctions that could take place.

Model A does not present a solution in line with the Target Model and it is also highly unlikely that it may attract sufficient liquidity for continuous trading.

Model B, outlining an imperfect model as proposed by the Market Operator, could be further improved if the following enhancements were introduced:

- Considering the continuous intraday market is expected to start at 22h of D-1, it could be deemed acceptable to maintain the first two intraday auctions taking place in D-1 and their present schedule allowing trading for all 24h of D day.
- Once the continuous trading process is initiated it should not be interrupted to hold regional auctions as these would negatively impact the liquidity of the continuous market.



## **EDP Energias de Portugal S.A.**

### **3. Comment on the type of bidding procedures in continuous markets**

EDP states that continuous trading should be processed on a portfolio basis as opposed to on a bidding (physical) unit basis. Portfolio based bidding is the norm in the majority of the European countries and should become so in Iberia as well.

Physical unit based continuous bidding entails major operational hurdles for market participants managing multiple conventional generation assets in Iberia that must be offered in the market through multiple bidding units. Maintaining the current arrangement implies the opening of as many trading sessions as there are bidding units in addition to explicitly accepting the possibility to trade between own units at all times.

Under the proposed solution, Iberian market participants will be at a clear disadvantage in relation to other European counterparts who will be able to continuously trade and also to optimize their generation portfolio at the end of each hour.

An additional market distortion will arise because unlike market participants bidding conventional generation plant, special regime generation market representatives are allowed to aggregate all their assets in a single portfolio in every market ranging from the day-ahead to the balancing market featuring also the aggregation of balancing deviations.

Moreover, EDP does not realize the linkage between unit bidding and enhanced market transparency within a continuous trading framework. Considering that the Market Operator does not publish the trading results on a bidding unit basis at the end of either the day-ahead or the intraday market sessions, it is therefore unknown to the market what each market participant trades in each market, an arrangement which is proposed to be maintained in the MIBEL continuous market.

The generation scheduling of each physical unit is only available following the disclosure of the P48 program by System Operators. This takes place at the end of each hour following the submission by all generators of their physical unit planned schedules regardless trading is processed on a portfolio or on a physical unit basis.

Therefore, EDP believes continuous trading on a unit bidding basis will not deliver any material advantage regarding the knowledge of the actual timing of market operations by market participants. It will, however, introduce a significant disproportional operational burden for market participants that operate conventional generation plant and multiple bidding units.

Under the present circumstances, and given the Portuguese specific case, EDP highlights this process is an opportunity demanding the review of the present balancing area concept and of the corresponding bidding units. These should be reformulated to enable their aggregation as a function of generating technology since there are no technical





## **EDP Energias de Portugal S.A.**

grounds to maintain the present configuration which entails a negative discrimination considering the remainder of European market participants.

### **4. Compliance with Regulation EU 2015/1222**

As stated in Regulation EU 2015/1222, when complementary regional intraday auctions exist, continuous trading within and between bidding zones may be stopped for a limited period not exceeding the minimum time needed to hold the auction and in any case no longer than 10 minutes.

This Regulation also establishes the conditions that must be met before competent regulatory authorities may approve the proposal for complementary regional intraday auctions (Article 63, no.4). One such requirement is that “(a) regional auctions shall not have an adverse impact on the liquidity of the single intraday coupling”.

Under the present market conditions, the liquidity of the single intraday coupling is not known. Moreover, Market Participants have had no indication as to what estimations may have been considered by regulatory authorities in order to fulfil that gap at this stage. Also, under this consultation, no further guidance has been reported that enables Market Participants to understand the metrics or the methodology that regulatory authorities intend to apply to measure the adverse impact of auctions on the liquidity of the single intraday coupling.

EDP understands that with such type of provisions the EU clearly wants to minimize the interruption of the continuous trading between bidding zones in order not to introduce undue discrimination between market participants from different regions, in this case between Iberian market participants and other European market participants.

EDP’s assessment of the design and of the implementation of these principles in the Iberian Electricity Market is that compliance with such provisions will be assured if the number of auctions is limited to a maximum of two per day D in cumulative terms regardless of these are already existing Iberian auctions or any other future pan European intraday auctions.

In addition to the above mentioned, this solution shall apply from the very beginning of the implementation and functioning of the hybrid model without the need for any further transitional arrangements maintaining more than two daily intraday auctions. From this starting point, Iberian Regulatory authorities shall periodically review the solution to guarantee that the Iberian intraday market design remains compatible with other European Regional solutions and that Iberian market participants are not discriminated against other European market participants.

**De:** David Oliveira [mailto:david.oliveira@rentrading.pt]

**Enviado el:** jueves, 31 de agosto de 2017 12:43

**Para:** xbid\_intradayauctions@erse.pt

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**Assunto:** Consulta sobre Leilões Regionais Intradiários Complementares no MIBEL

Exmos. Senhores,

Tendo em conta a decisão tomada pelos reguladores ibéricos (ERSE e CNMC), implementação do modelo B, a REN Trading considera que se devem manter os dois leilões intradiários, efectuados em D-1, e que a base da negociação do mercado de electricidade deverá ser, como presentemente, as unidades de oferta, não devendo estas ser substituídas pelo modelo de carteira de negociação.

Melhores cumprimentos,

David de Oliveira



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## Public consultation for complementary intraday regional auctions for the Spanish-Portuguese bidding zone border

### EDF Response

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11/09/2017

#### General remarks

The involvement of stakeholders in the implementation process of the CACM regulation is of paramount importance to ensure the efficiency and transparency of the methodologies proposed by TSOs and NEMOs. Therefore, EDF regrets that the publicity given to the first public consultation (February 13th-March 13th 2017) on the common proposal by the Iberian TSOs and NEMO of intraday regional auctions was largely insufficient (publication only on the OMIE website) to make French market participants aware of the proposal and to allow them to answer before the deadline.

As a matter of fact this proposal is not only relevant for the border between Spanish and Portuguese bidding zones, but it is more generally structural for the functioning of intraday market in those bidding zones, which has a strong influence on the French/Spanish bidding zone border as well. From this perspective, EDF regrets that the TSOs and the NEMO involved in this consultation did not provide in the proposed documentation enough detail on the expected impact of the two proposed models on the liquidity of day-ahead and intraday markets in the whole South-West Capacity Calculation Region (SWE CCR).

Nevertheless, EDF believes that this second consultation on complementary intraday regional auctions in Spain and Portugal is a fundamental step to allow all market participants active in the SWE CCR to express their opinions which should be duly considered by all the regulators of the region.

#### Specific comments on the proposed Models A and B

EDF does not consider the hybrid models proposed by the Iberian TSOs and NEMO beneficial for the efficient functioning of the single intraday coupling. EDF is in favour of the integration of intraday markets through the full implementation of the intraday (ID) continuous trading, believing it to be the best solution to allow market participants to balance their position close to real time with sufficient flexibility. Therefore, EDF regrets that an option C, featuring no ID regional auctions but only a continuous ID market, as it is implemented in France for instance, is not proposed nor considered.

In our view, the introduction of intraday implicit auctions is most likely to significantly affect the liquidity of both the continuous intraday market and the single day-ahead market coupling, which would be contrary to the requirements of the Capacity Allocation and Congestion Management (CACM) Regulation and against the European target model for the electricity market.

EDF acknowledges that Article 63 of the CACM Regulation allows for the implementation of complementary regional intraday auctions but under specific conditions, listed in paragraph 4 of Article 63. Yet, EDF believes the fulfilment of all those conditions is not guaranteed by the approaches proposed in the current consultation.

We detail below the reasons why we think that, under CACM regulation (i) Model A should be excluded (ii) Model B might therefore be preferable, although it is far from being fully compliant with the CACM Regulation, in particular regarding its impact on liquidity.

In our view, Model A should be excluded, since it is manifestly in contradiction with the provisions of CACM Regulation. In particular, Article 59.4 of CACM Regulation states that *“the intraday energy trading for a given market time unit for a bidding zone border shall start at the latest at the intraday cross-zonal gate opening time (IDCZGOT) of the relevant bidding zone borders and shall be allowed until the intraday cross-zonal gate closure time (IDCZGCT)”*. According to Model A, trading on the continuous market is permitted only for the trading period prior the next intraday regional implicit auction to be held. This means that at the IDCZGOT (22:00 in D-1 for the SWE CCR in the current common proposal) only a limited number of hours of day D will be open to trade on the continuous market instead of all market time units. For these reasons, model A should not be applied, even as a transitory solution. Moreover, the necessity of a transitional period of up to 18 months is not adequately justified.

From the perspective of Article 59.4 of CACM Regulation, Model B might be preferable. However, EDF notices that both approaches are contrary to the requirements of Article 63.4 of CACM Regulation, as they are most likely to jeopardize the well-functioning of the Single Intraday Coupling (SIDC) by dramatically reducing the liquidity after the last ID regional auction. Indeed, considering the specificities of the Iberian electricity market where BRPs and BSPs can modify the schedules of their assets only through organized market auctions (and consequently they cannot modify them after the last intraday auction), the flexibility that can be proposed in Spain or Portugal on intraday continuous trading (i.e. on the future XBID platform) after the last ID auction will be dramatically limited to those assets that are not obliged to set their schedule on the basis of the auctions' results.

Thus, as long as all assets in Spain and Portugal will not be allowed to update their schedule up to the IDCZGCT, the proposed complementary regional auctions won't be in line with Article 63.4(a) of the CACM Regulation which stipulates that *“regional auctions shall not have an adverse impact on the liquidity of the single intraday coupling”*.

Finally, EDF wishes to highlight that a reduction of the current number of intraday auctions could be an improvement of the Model B in order to avoid several interruptions of continuous trading. Nevertheless, regulators do not provide any indications on the time necessary to carry their assessment of this possible evolution and on the final target in terms of number of auctions.



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### **Public consultation for complementary intraday regional auctions for the Spanish-Portuguese bidding zone border**

EDF Trading considers both Model A and Model B to be very far from the spirit of the CACM Guideline. Model B presents a better compromise, as it would allow market participants to trade sufficiently in advance of real time in XBID by opening all 24 hours of the day for negotiation, even though the continuous market would be repeatedly interrupted.

We support the implementation of Model B for XBID launch in Q1 2018 and not 12/18 months later. Implementing model A is not an acceptable proposition, model A should not be applied, even as a transitory solution. Market participant should be allowed to trade all 24 hours of the delivery day. Trading only the next few hours as proposed in Model A is a big step back in the intraday market development.

Moreover, the necessity of a transitional period of up to 18 months is not adequately justified.

We support the proposal to reduce the number of regional auctions:

- To avoid the interruption of continuous trading.
- Having a lot of auctions will automatically reduce the liquidity of the continuous intraday market. Having the maximum of liquidity on the continuous market is crucial.

We would also recommend to explicitly state the number of regional auctions and the deadline targeted.

We strongly support the fact that all market participants should be able to participate in both regional auctions and the XBID platform on an equal footing. If not all actors are allowed to participate to the local auctions, it is clearly discrimination between different types of market participants.



## EFET response to the public consultation for complementary intraday regional auctions for the Spanish-Portuguese bidding zone border

■  
11 September 2017

The European Federation of Energy Traders (EFET)<sup>1</sup> welcomes the opportunity to comment on the position of the Spanish and Portuguese regulatory authorities CNMC and ERSE on the proposal by OMIE, REE and REN on the design of the complementary intraday regional auctions for the Spanish-Portuguese bidding zone border.

We welcome CNMC and ERSE's decision to launch a new public consultation that considers the outcome of the initial proposal made by the TSOs and NEMOs. Hereby we would like to comment on the following three points.

First, **we reiterate the need of a viable solution which is that the MIBEL intraday market becomes, at once, fully compatible with the European target model:** with one single opening auction, giving the opportunity to market participants to negotiate in XBID continuous market all available hours of given day D without restrictions and well in advance of real time.

EFET considers both Model A and Model B to be very far from our preferred solution outlined above, as well as from the spirit of the CACM Guideline. Model B presents a better compromise, as it would allow market participants to trade sufficiently in advance of real time in XBID by opening all 24 hours of the day for negotiation, even though the continuous market would be repeatedly interrupted. Hence, we support the implementation of Model B as soon as possible, preferably for the launch of XBID in Q1 2018 and not 12/18 months later. In its current form Model A clearly contradicts

<sup>1</sup> The European Federation of Energy Traders (EFET) promotes competition, transparency and open access in the European energy sector. We build trust in power and gas markets across Europe, so that they may underpin a sustainable and secure energy supply and a competitive economy. We currently represent more than 100 energy trading companies, active in over 27 European countries. For more information: [www.efet.org](http://www.efet.org).



the Target Model and is therefore not acceptable in mid to long term, as it does not allow market participants to trade all hours of a given day at any time in XBID.

Furthermore, we support the proposal by CNMC and ERSE to reduce the number of regional auctions to avoid the interruption of continuous trading in Model B. However, this solution would only work in a model based on portfolio bidding. In practice, continuous trading is not compatible with unit-by-unit bidding. Also, for the sake of transparency and equal level of information for all market players, we would recommend CNMC and ERSE to explicitly state the number of regional auctions they are targeting and a deadline by which the final model should be attained.

Second, we generally welcome the intention of harmonising gate opening and closure times for cross-border intraday trading in Europe. However, we oppose the TSOs proposal to move the Gate Opening Time (GOT) in XBID to 22:00 of D-1 in the SWE region – and in most of the other CCRs.

We believe that the GOT should be set earlier in the afternoon of D-1. In practice, a GOT set at 22:00 would:

- Represent a step-back from the current practice in the region;
- Mean that many market participants (especially smaller ones without a 24/7 trading desk) will only be able to trade in XBID during the following morning.

In short, we believe that the GOT ought not only to be harmonised across Europe, but that it should be set at a much earlier time in the afternoon. We consider it the duty of National Regulatory Agencies to take part in the decision-making process relating to the harmonised GOT and oppose the proposals of the TSOs, which could jeopardize the liquidity and well-functioning of the XBID market.

This being said, and considering the current GOT proposal of the TSOs for the SWE region, we call for the timing of the opening auction to be advanced in order to avoid penalising certain categories of market participants, and attract more liquidity in the auction. Therefore, **EFET supports the decision made by CNMC and ERSE to keep the time for the opening auction at 19:00 of D-1 for the time being.** If and when the GOT for the region is established at an earlier time in the afternoon, the timing of this opening auction should of course be adapted.

Third, **EFET advocates a simple negotiation on the continuous market of portfolio positions (including OTC contracts) with direct nomination to the TSO, in line with CWE experience.**

The main objective of the CACM Guideline is to ensure non-discriminatory access to cross-zonal capacity while maximising social welfare. Compared to best practices in

the rest of Europe, the obligation currently in place on the Iberian market to bid generation units has a discriminatory effect on market participants and contradicts a basic principle of the liberalised electricity sector: providing a level playing field to all market participants, whether or not they own physical assets.

We believe that the elimination of mandatory units bidding is an essential component of market participants' freedom regarding their bidding strategy. The identification of individual plants for dispatch purposes needn't happen via the market: it is done with success in most other European markets by separate nominations and re-nominations to the TSO(s) while maintaining the same levels of transparency in the market and ensuring the existence of a sufficiently reliable spot reference price. The freedom of market participants to choose the best tool to manage their intraday positions is fundamental to allow everyone's participation to both regional auctions and the XBID platform on an equal basis.



## **PUBLIC CONSULTATION FOR COMPLEMENTARY INTRADAY REGIONAL AUCTIONS FOR THE SPANISH-PORTUGUESE BIDDING ZONE BORDER**

Fortia Energia S.L. appreciates the opportunity offered by the competent regulatory Authorities of MIBEL -CNMC and ERSE- to the stakeholders to express their views in a public consultation on the complementary intraday regional auctions in the area.

First, we would like to congratulate both Regulators, the TSOs involved and the common NEMO for the accurate and qualified work performed to accomplish the mandates derived from Regulation 2015/1222 on time and attending successfully the MIBEL market specificities.

**Question 1. Model B should be introduced after a reasonable transitional period that could be estimated between 12 months and 18 months after the go-live of the SWE LIP**

As expressed in the public consultation carried out by the TSOs & common NEMO last March, Fortia, given its size (small) and nature (independent player without vertical integration), prefers **MODEL A** as the final target of MIC. We think auctions lead to higher efficiency as they (1) aggregate trading volumes in specific periods of time, increasing liquidity, (2) limit market power abuse, (3) facilitate the introduction of price-takers bid. This allows for auction clearing prices to closely reflect competitive prices and to provide more robust economic signals than a continuous pay-as-bid trading mechanism.

Furthermore, MODEL A is in line with the Proposal for the Single Methodology for Pricing Intraday Cross-Zonal Capacity<sup>1</sup>, according to which *“the single intraday continuous coupling mechanism shall be organized in discrete sessions which allow for continuous allocation of intraday cross-zonal capacity for MTUs, which are not covered in the forthcoming Intraday Auction and not traded in a preceding continuous session.”*

Despite our opinion, if MODEL B is adopted, we agree with the Iberian Regulators that there is a need for a transient period during which MODEL A is applied to let every market player time to adapt its internal procedures, systems and to prepare the staff who operate on the continuous intraday market. Therefore, we value positively the proposed transitional period of 12-18 months before the implementation of Model B.

**Question 2. Whether the number of auctions in day D (auction 3, 4, 5 and 6) should be reduced, to minimize interruption time of continuous trading in the Spanish and Portuguese bidding zones.**

As abovementioned, auctions are an important tool for small agents to adjust their positions according to better production/consumption forecasts at a reasonable price. Through auctions smaller agents can adjust their market schedules in a cost-effective manner, since they can send price-taker bids without incurring the risk of getting an excessive high price and automatically (i.e. without requiring staff to continuously monitor the screen).

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<sup>1</sup>[https://consultations.entsoe.eu/markets/czidcp/supporting\\_documents/170407\\_CZIDCP\\_Methodology\\_for%20consultation.pdf](https://consultations.entsoe.eu/markets/czidcp/supporting_documents/170407_CZIDCP_Methodology_for%20consultation.pdf)

For this reason, we favor keeping a larger number of auctions than only 2. Ideally, we prefer to let the number of auctions as they are today.

**Question 3. Intraday cross-zonal gate opening time in XBID in the SWE region. Current All TSO's proposal defines this hour as 22:00 of day D-1.**

We share the view of both Regulators on keeping the first two auctions of day D-1 as they are now. At least we see important to keep the current schedule of Intraday 1 to avoid extending labor hours longer in the day. This schedule fits well with the schedule of DA trading and some processes of balancing markets.

**Question 4. Physical market vs. financial market**

We fully agree with the opinion of the Iberian Regulators. MIBEL, designed as a physical market with the identification of production units in bids, has proven to be transparent, efficient, and highly competitive. This is an asset that cannot be lost while adopting the new EU regulations.

In fact, introducing portfolio orders could represent a step back in terms of competition and transparency as it will benefit large generators in detriment of new entrants or non-vertical-integrated companies.

Intraday markets were designed to facilitate adjustments of load and demand, reducing costly balancing requirements. Therefore, they have an intrinsic physical nature as opposed to financial markets where speculative negotiation with portfolio bids has a sense.

In addition, keeping the bids as they are today do not imply extra complexity to MIBEL generators, as they might prepare selling or buying bids easily from the current operating point of each unit. Consequently, no discrimination could be evoked in comparison to other generators outside the MIBEL area.

Finally, if for any given reason continuous trading would be performed with virtual bids, a mandatory after-the-fact itemizing in physical units shall be required by the market operator.

September 11<sup>th</sup>, 2017



LEI-CM-DIESE- - - -

OBJECT RTE's opinion on public consultation

Paris la Défense, 07/09/2017

Dear sir, madam

Please find attached the opinion of RTE regarding the public consultation for complementary intraday regional auctions for the Spanish-Portuguese bidding zone border.

Best regards

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**Direction Economie Système  
Electrique**

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05-09-00-COUR



## **Consultation paper on Complementary Intraday Regional Auctions for the Spanish-Portuguese bidding zone border**

RTE welcomes to opportunity to provide feedback on the proposal for complementary regional auctions for the Spanish-Portuguese bidding zone border developed by the Iberian NEMO and TSOs.

RTE is in favor of the establishment of a continuous trading mechanism with a pricing mechanism of the intraday capacity in accordance with Article 55 of CACM. CACM Regulation defines the continuous trading as the European Target Model for the allocation of intraday capacity. It is also considered as an efficient arrangement to exchange power at as it allows producers and consumers to optimize their positions as close as possible to real time and immediately react to any unexpected changes in such positions.

While RTE acknowledge that complementary auctions are allowed under Article 63 CACM and that such mechanisms are an effective way to set a price for intraday cross-zonal capacity, RTE emphasize the need for these auctions to interfere as little as possible with the functioning of the intraday continuous trading mechanism and the pricing mechanism of the intraday capacity.

### **Impact on liquidity of the single intraday coupling**

In line with the provisions of CACM Article 63 and the EU Target Model described in this Regulation, continuous trading should be the primary mechanism to exchange electricity within the intraday timeframe, while auctions should only play a complementary role.

By proposing 6 regional auctions, 4 of which are performed during the day, the Spanish-Portuguese models here proposed will significantly affect the continuous trading and have an adverse impact on its liquidity unlike the requirement of the CACM Article 63.

Whether in Model A or Model B, the design chosen by Iberian NEMO and TSOs will stop during certain time windows the continuous trading in Spain, and thus on the France-Spain bidding zone border while no capacities will be allocated on this border. This means that the liquidity of Iberian market will temporary not be accessible to French market parties, nor other European market parties. **RTE considers that other options not affecting the continuous trading on France-Spain interconnection shall be studied.**

Therefore, similar to the design of complementary regional auctions on Italian Borders, ATC in the single intraday coupling could be temporarily set at 0 for the border concerned (PT-ES border) prior to a regional auction, and the remaining capacities after the regional auction would be then allocated through the single intraday coupling. Such an option would be more compliant with CACM provisions since it would limit the impact on the liquidity of the single intraday coupling, allowing market parties to decide whether they would prefer trading on continuous trading or bidding on a regional auction.

### **Discrimination between market parties from adjacent regions**

Besides, implementing regional auctions organized on a single bidding zone border is not in line with the spirit of European Regulation that aims at harmonizing progressively the market functioning all over Europe. **Adding these new specificities for the two Iberian bidding zones, will only reinforce the discrimination between market parties from different bidding zones and could only slow down the harmonization of market through Europe.**



### **Coordination with Intraday Capacity Pricing**

Where one complementary regional auction is set close to the pan-European auction for intraday capacity pricing, **RTE is in favor of coordinating the complementary regional auction within the same timing than the pan European auction** in order to increase the liquidity of the latter and reduce regional specificities that will only induce discrimination between market parties from different bidding zones.

### **Efficiency of a regional auction**

Any auction not preceded by a coordinated capacity calculation performed in accordance with Article 21 of CACM has a limited efficiency since it will only price capacity already priced within the previous pan European auction (Day-ahead market coupling or Intraday Capacity Pricing).

As expressed previously, the European Target model defined by CACM is the continuous market. **Before affecting the latter with multiple regional auctions, it shall be assessed for each regional auction that interrupts the continuous trading whether it is economically relevant or not.** Otherwise there is no rationale to deviate from the European Target model.

**Where a regional auction is organized prior to the SWE IDCZGOT (22:00 D-1), it shall be performed early enough to ensure its results are taken into account in the IGM generated for the European merged DACF, also used for security analysis and intraday capacity calculation.** Otherwise, this would increase the level of uncertainties on generation patterns of the Iberian bidding zones and reduce the efficiency of the SWE intraday capacity calculation.

### **Uncertainties on implementation**

RTE agrees that no complementary regional auction shall be implemented before the go live of the single intraday coupling (Xbid project).

RTE also shares the view the model B is less impacting the functioning of the European target model, with lower discrimination of foreign players.

However there is a high uncertainty on the timing for implementation of the Model B where there is no guarantee it will be effective within the deadlines specified and what would be the consequences/decisions taken by NRAs if they are not met.

**Therefore RTE is not in favor of any transitional period and where a complementary regional auction could be implemented before the go live of the single intraday coupling on Iberian borders.**

**COMENTARIOS DE EDP ESPAÑA A LA CONSULTA PÚBLICA SOBRE “COMPLEMENTARY INTRADAY REGIONAL AUCTIONS FOR THE SPANISH-PORTUGUESE BIDDING ZONE BORDER” ABIERTA POR ERSE Y LA CNMC EL 28 DE JULIO DE 2017.**

- 1. Model B should be introduced after a reasonable transitional period that could be estimated between 12 months and 18 months after the go-live of the SWE LIP**

En su momento, la posición del Grupo EDP fue utilizar desde el momento inicial un modelo incluso más avanzado que el B. Actualmente y dados los plazos disponibles, nos parece acertado considerar el modelo A como un modelo de transición con una fecha definida para su caducidad, y nos parecen adecuados los plazos de un año para la transición hacia un modelo con tiempos y formatos como el resto de Europa.

Creemos que la transición debe estar finalizada antes del *go-live* del proyecto Terre, de tal forma que la operativa de los agentes en tiempo real ya esté en su formato definitivo cuando se aborde el siguiente paso en la integración de mercados europea.

El plazo debería acortarse en el caso de detectarse una muy probable reducción en la liquidez y volumen de los mercados de subastas.

- 2. There may be a need to assess if the number of auctions in day D (auction 3, 4, 5 and 6) should be reduced, to minimize interruption time of continuous trading in the Spanish and Portuguese bidding zones. For this assessment, some experience with the new intraday model will be needed.**

Tal como ya apuntamos en la respuesta sobre los modelos A y B, una vez arrancado el intradiario continuo podrían eliminarse parte de los intradiarios intermedios.

Creemos que debería hacerse un solo cambio, pasando de 6 a 3 intradiarios (1,2 y 5) y antes de los 6 meses de puesta en marcha. No realizar la supresión en varias etapas.

- 3. There is going to be a common Intraday cross-zonal gate opening time in XBID and, therefore, in the SWE region. Current All TSO’s proposal defines this hour as 22:00 of day D-1.**

Debido a las particularidades del mercado ibérico, en especial del español (restricciones, secundaria y reserva de potencia), consideramos imprescindible la existencia de un mercado intradiario, que realice un gran ajuste por subasta, posterior a los procesos de seguridad del sistema. Debe mantenerse el intradiario 1, que podría ver reducido su alcance a solo 24 en lugar de las 27 actuales, pudiendo así retrasar el momento de su cierre.

Pasado un tiempo prudencial, por ejemplo 1 hora, se puede mantener una segunda sesión para arrancar el mercado continuo, lo que permitiría tener una secuencia de mercados coherente.

Respecto a los horarios, esta segunda sesión a las 22h es correcta, permite negociar la hora 1 del día durante 60 minutos, siendo además posterior a la publicación de los resultados de secundaria de Portugal.

- 4. Therefore the Iberian Regulatory Authorities consider the importance of keeping the first two auctions in day D-1, with similar timetable as the current one, regardless the agreed IDCZGOT in the SWE region, where the second auction might be replaced by the foreseen pan European intraday auction provided by Intraday Capacity Pricing Methodology.**

Manteniendo la bondad de tener dos subastas previas, y habida cuenta que la primera de ellas tendrá solo 24 horas en el modelo B, sometemos a la consideración de los reguladores la posibilidad de pasar la primera a trabajar desde el momento inicial con 24 periodos horarios pudiendo entonces retrasar su cierre hasta las 19:00, e incluso hasta las 20:00.

- 5. There may be a need to assess the benefits of establishing a local link between each block bid submitted to the continuous trading, and the corresponding bidding unit (as defined for day ahead).**

Aunque por razones históricas y de separación de funciones entre el Operador del Mercado y del Operador del Sistema, en especial con la liquidación de los actuales servicios de ajuste, hicieron que el Operador del Mercado dispusiese de toda la información física del sistema, a día de hoy ha desaparecido esta necesidad. Los Operadores del Sistema ibéricos sí están realizando plenamente sus funciones, encargándose de que los programas casados mantengan correctamente su trasfondo físico, vigilando que no haya grupos por encima de sus potencias disponibles, teledirigida de todas las instalaciones de más de 1 MW frente a los 10 MW de hace

unos años, sistemas informáticos muy ágiles y experimentados capaces de limitar en unos pocos minutos todas las instalaciones mayores de 1 MW, etc.

En este contexto pretender mantener hasta 60 minutos antes de tiempo real en el Operador del Mercado toda la visión física del sistema carece de ventajas. Deben ser los Operadores del Sistema quienes conozcan y controlen la realidad física, cuestión que consiguen en cualquiera de las alternativas.

Con el modelo propuesto, tanto el mercado diario como las 2 principales sesiones del mercado intradiario se seguirán realizando por unidad de oferta. Cualquier tipo de supervisión, análisis de estrategias, benchmarking, por parte de agentes competidores puede ser realizada a los 3 meses igual que ahora. A lo largo de más de 19 años del mercado nunca se detectó ninguna actuación merecedora de cualquier tipo de comentario.

Desde el punto de vista de las funciones de supervisión y seguridad de los Operadores del Sistema, no hay absolutamente ninguna diferencia. Tras cada ronda del MIC, los agentes desglosaríamos las unidades de cartera en las unidades físicas en un periodo aproximado de 5 minutos. La visión de los Operadores del Sistema a través del programa operativo (P48) será exactamente igual sea cual sea la forma de trabajo en unidades de oferta o de cartera. Desde este punto de vista tampoco hay ningún tipo de ventaja en las ofertas por unidad de oferta.

Las funciones de supervisión por parte de los propios reguladores, e incluso de los agentes competidores, universidades, etc, podría ser realizada con la misma capacidad de análisis accediendo a los distintos P48. Las operaciones de más volumen pueden ser analizadas igual que ahora en las dos primeras sesiones de subasta, y basta hacer una simple diferencia entre las versiones adecuadas de programas horarios operativos consecutivos para descubrir las intenciones de los agentes y sus operaciones en cada ronda del intradiario.

Al realizar una diferencia entre P48 se pueden analizar perfectamente las variaciones de energía entre las distintas unidades de programación (más detalle que unidades de oferta) y supervisar así las acciones de los agentes en cuanto a volumen. Desde el punto de vista de precio, a lo largo de una ronda la volatilidad del precio más allá del segundo intradiario es de esperar que no sea muy relevante y en consecuencia el promedio de las operaciones realizadas por un agente a lo largo de 60 minutos será suficientemente representativo de sus precios. El valor añadido para la supervisión que representa disponer de los precios de oferta por unidad de oferta (que no física) es ínfimo en un mercado continuo.

Es necesario recordar en este punto que el mercado continuo no es marginal, por tanto las ofertas al mismo se confeccionarán a partir de las curvas de oferta visibles en el mercado y no



tanto por los costes, esquema totalmente diferente a un mercado de subastas marginal donde se puede ofertar, si se desea, basado en costes y siendo tomador de precio.

Entendemos que determinados mercados como el diario o la actual terciaria sean de oferta obligada, y por tanto la supervisión del volumen ofertado pueda ser encomendada a los operadores. Pero el mercado intradiario es voluntario y por tanto esta funcionalidad no necesita del control por el Operador del Mercado.

La generación de las cuencas hidráulicas requiere un tratamiento conjunto de la oferta por estar enlazadas las distintas unidades físicas. A día de hoy son ofertadas en portfolio y sin embargo los Operadores del Sistema disponen de toda la información a nivel de unidad física a partir de los desgloses que se les envían. El mercado carece de esta información desde el origen del mismo, sin que esto haya presentado ningún tipo de problema. De igual forma la oferta en mercado de la nueva e importante generación eólica y solar, es tratada no molino a molino, sino como portfolios que aglutinan la mayor cantidad de instalaciones posibles, siempre dando a los Operadores del Sistema la mayor y más fiable información a nivel de parque, al margen de los programas visibles en mercado. Se tiene aquí un ejemplo claro de ventajas, que redundan en menores costes, por tener niveles de agregación.

Casi todos los agentes europeos disponen de la oportunidad, y la aprovechan, de ofertar en portfolio desde el mercado diario. Admitiendo que en la Península Ibérica tendremos ya tres subastas por unidades desglosadas que permiten un grado de supervisión, que en otros países se ha considerado innecesario, parece evidente que este nuevo mercado continuo se pueda hacer y desarrollar tal como tienen nuestros competidores europeos.

De realizarse ofertas de cartera, aún mantendríamos alguna diferencia al gestionar en unidades separadas la generación y la demanda, y no permitir modificar el volumen de los contratos bilaterales a lo largo del día.

Desde el punto de vista de los agentes hay ventajas operativas relevantes, desde la utilización cuasi-directa de sistemas informáticos diseñados en Europa para carteras de portfolio a la gestión integrada de las distintas unidades de programación hasta 60 minutos antes de tiempo real.

Toda actividad de intercambio de energía intraagente estará buscando hacer sinergias entre distintos grupos y tecnologías, lo que bajará el coste para dicho agente y se traducirá de forma inmediata al mercado en caso de ser marginal.<sup>1</sup>

Con un mercado intradiario por unidades de oferta, se impiden los intercambios de energía intra-agente, lo que obligará a desarrollar mecanismos para intentar hacerlos en el mercado dando lugar a *washtrade*, y con toda probabilidad alterando artificialmente el *spread* del mercado.

El mercado por unidades de oferta también representa un importante problema para los agentes que quieran hacer una gestión activa en el mercado. Un operador puede atender a las curvas de oferta para seleccionar/mantener ofertas con 4 ó 6 bloques por hora, mientras que si debe ofertar por unidades el número de bloques a gestionar sería infinitamente mayor, lo que hará que las centrales alejadas del marginal puedan no ser ofertadas, restando con total seguridad profundidad al mercado y obligando a una gestión automática menos eficiente.

Un tema relevante que pone de manifiesto que el mercado continuo no puede ser tratado con los mismos mecanismos que el mercado actual, es el tratamiento de indisponibilidades y limitaciones. La supervisión por parte del Operador de Mercado de los límites de potencia de las distintas unidades no debe interferir en absoluto con el mercado. Si desea hacer una supervisión, de todo punto innecesaria, debe ser tan rápida como lo sean las publicaciones del Operador del Sistema, y como lo sea el agente comunicando indisponibilidades al Operador del Sistema y al resto de agentes cumpliendo REMIT. Este control será complicado, difícil y limitante de forma gratuita para el agente, mientras que en ofertas de portfolio unos minutos después del cierre de la ronda puede reasignar energías en la nominación optimizando su cartera. Para los Operadores del Sistema, encargados de la seguridad y de la factibilidad física de los programas, es indiferente pues tras la nominación recibirán las energías por unidades de programación.

Oviedo, 11 de septiembre de 2017

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<sup>1</sup> Ejemplo de sinergia puede ser un agente con varios ciclos combinados en marcha. El óptimo del reparto de la energía a producir entre ellos es diferente según el volumen total vendido.