# Explanatory note for the all-NEMOs amendments proposal on the terms and conditions applied for the "Harmonized maximum and minimum clearing prices for single intraday coupling" in accordance with Article 54 of Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management

24 July 2025

**Disclaimer**

This explanatory document is submitted by all NEMOs to the European Union Agency for the Cooperation of Energy Regulators for information and clarification purposes only accompanying the "All NEMOs" proposal for amendment of the terms and conditions applied for the "Harmonized maximum and minimum cleared process for single intraday coupling", in accordance with Article 54 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management.

# Contents

# 1. Introduction

This explanatory document gives a high-level overview of the background and context for the amendments proposed by All NEMOs for the terms and conditions applied to the "*Harmonized maximum and minimum clearing prices for single intraday coupling*" (hereinafter "the HMMCP Methodology for SIDC") as currently in force according to the ACER Decision 02/2023. Besides any phrasing improvements, terms definitions and usage in the document, this proposal concentrates on the amendments required to avoid the update of harmonized maximum minimum clearing prices for SIDC following prices-spikes mainly related to low liquidity in the market with little correlations to market fundamentals.

# 2. Background

Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on the capacity allocation and congestion management (the 'CACM Regulation') laid down a range of requirements for the cross-zonal capacity allocation and congestion management on the day-ahead and intra-day markets in electricity. Chapter 5 of the CACM Regulation specifies requirements for the SIDC, including the provisions for setting the harmonized maximum and minimum clearing prices in accordance with Article 54 of the CACM Regulation.

Pursuant to Article 9(13) of the CACM Regulation, the NEMOs responsible for developing the proposal for the HMMCP for SIDC, may propose amendments to the Methodology and submit them to consultation in accordance with the procedure set out in Article 12 of the CACM Regulation. To this extent, NEMOs conducted a public consultation on their proposals for updating the HMMCP for SIDC from 24/02/2025 to 24/03/2025. These proposals were also presented in an ad-hoc public workshop organised by the NEMOs on March 12$^{th}$ 2025.

# 3. Inclusion of a triggering condition based on market liquidity

In order to adjust the harmonized maximum and minimum clearing price limits for SIDC based on price which are representative of market fundamentals and not based on price spikes due to the low liquidity of the market, NEMOs propose to add a triggering metric for the update of the max/min clearing price based on market liquidity. In particular traded volumes per MTU-BZ shall be at least equal to 5MW.

For the IDA auctions, in some bidding zones the liquidity is currently very low. The volume of matched orders is very small – less than 5MW – and matching occurs only in some of the MTUs. Some bidding zones have no volume matched in any MTU for many days. Also, an order with only a small volume may cause a price spike reaching the thresholds if it is delivered, for instance, as price independent or the price set in the order was set by mistake by the market participant.

For the above reasons, we are now proposing to consider the triggering event only if the traded volume in the MTU-BZ is at least equal to a minimum threshold.

NEMOs proposed a simplified metric with respect to the one proposed in the public consultation since, based on feedback received from MPs as well as from TSOs and ACER in the public consultation, NEMOs realized that the metric identified was overly elaborate, and could have created interpretive problems that could have undermined the transparency of the methodology. For this reason, in the version of the methodology submitted to ACER for decision, the liquidity metric was simplified, requesting the traded volumes per BZ/MTU in the auction to be greater than 5MW. The same metric, for consistency reasons, is proposed both for SDAC and SIDC.

# 4. Amendments to the HMMCP Methodology for SIDC

This section provides an executive summary of the amendments provided for the HMMCP Methodology for SIDC.

## 4.1 Article 4

Included rephrasing/clarification improvements of existing content and terms. Added content relevant to the triggering condition based on liquidity.

## 4.2 Appendix 1

Updated the list of NEMOs to which the SIDC Products methodology applies.

## 5. Useful links

Commission Regulation (EU) 2015/1222 (CACM)

https://eur-lex.europa.eu/eli/reg/2015/1222/2021-03-15

Regulation (EU) 2019/943

https://eur-lex.europa.eu/eli/reg/2019/943/oj

ACER Decision 02-2023 (Harmonised maximum and minimum clearing price methodology for the single intraday coupling)

ACER Decision 02-2023 (Annex-I)

## 6. Abbreviations

BZ – Bidding Zone

CACM – Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on Capacity Allocation and Congestion Management (Capacity Allocation and Congestion Management)

ID – Intraday

MTU – Market Time Unit

NEMO – Nominated Electricity Market Operator

OBK – Orderbook

SDAC – Single Day-Ahead Coupling

SIDC– Single Day-Ahead Coupling

TSO – Transmission System Operator