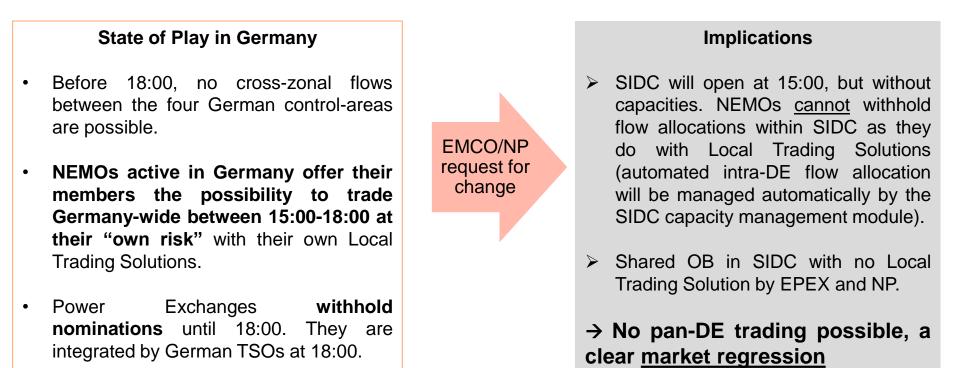
## GOT in Germany: the Request for Change in SIDC may lead to a market regression

ACER Decision 04/2018 sets a harmonised IDCZGOT at 15:00 (CET). Order books are shared among NEMOs as of 15:00 whenever technically possible.



## SIDC: The last hour should not become a mandatory pool at the expense of innovation on ID (and beyond)

- The shared order book is an instrument to ensure non-discriminatory access to capacity (natural monopoly). Absent this need, it is not economically justified and shall not be mandatory. It does not apply in any other case of the Exchange industry.
- The Intraday market is **extremely dynamic** and playing an ever-increasing role to integrate renewables. It is **not mature yet** and it is a **fully contestable market** offering opportunities for different players (NEMOs, trading platforms, OTC etc).
- Competitive Power Exchanges can freely decide to organise and offer trading platform services during the last hour (they all do in Germany).
- **Market participants have access to the entire market liquidity**, as they are free to trade on one or several of the competing Power Exchanges, making their choice based on i.a. transaction costs, the product variety and the service level, functionalities and system performance.
- A mandatory pool and socialisation of markets raise serious competition concerns including: unfair treatment of NEMOs compared to other market places; high uncertainty and risk for future competitive framework in Power Exchanges and adjacent markets.
- Mandatory sharing of liquidity will come at the expense of entrepreneurship and innovation in trading products, services and markets. Providing incentives to innovate, do better and maintain Local Trading Solutions is critical to the market's development, efficiency and reliability.