

26 May 2021

Mr Rafael Gómez-Elvira González
Chairman
All NEMO Committee

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By e-mail only

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Subject: Request on behalf of all NRAs and ACER to NEMOs for full integration of order books in the intraday timeframe

Dear Chairman of the All NEMO Committee,

Dear NEMOs,

Regulation (EU) 2019/943 of the European Parliament and of the Council of 5 June 2019 on internal electricity market ('Electricity Regulation') as well as the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a guideline on capacity allocation and congestion management ('CACM Regulation') require from all Transmission System Operators ('TSOs') and Nominated Electricity Market Operators ('NEMOs') jointly to establish and operate the integrated day-ahead and intraday electricity markets in order to maximise the efficiency and effectiveness of the EU electricity day-ahead and intraday trading.¹

To fulfil these requirements for the intraday market, all EU TSOs and NEMOs have developed and implemented a common trading infrastructure based on continuous trading (i.e. Single Intraday Coupling - SIDC), which enables all NEMOs to integrate their order books and match all orders from all NEMOs, while simultaneously allocating the available cross-zonal capacities provided by all TSOs.

Despite the availability of the SIDC trading infrastructure, which allows for the collection and matching of orders from all NEMOs, all NRAs and ACER regret to observe that some NEMOs still refrain from integrating their order books and allowing intraday trade in line with the applicable legislation.

On behalf of all NRAs and ACER, we would like to underline that the integrated intraday market does not only require the coupling of the order books of NEMOs in different bidding zones but

¹ Article 7(1) of Electricity Regulation

also requires the coupling of the order books of NEMOs operating within the same bidding zone. This view is supported by Article 7(1) of the Electricity Regulation, which provides a clear requirement for TSOs and NEMOs jointly to establish and operate such integrated day-ahead and intraday markets together with Article 7(2)(g) of the same Regulation that prevents making any distinction between the trades within and across bidding zone borders on those jointly organised intraday markets.

Therefore, given that the integration of NEMOs (and their order books) within a bidding zone is supported by the Electricity Regulation and that such integration is possible in the existing SIDC trading infrastructure, all NRAs and ACER request from all NEMOs to keep their order books integrated in SIDC for those bidding zones where intraday trading is allowed also after the intraday cross-zonal gate closure time.

All NRAs and ACER take this view irrespectively of the Commission's investigation announced on 30 March 2021.

All NRAs and ACER are available to further explain and discuss this request with all NEMOs in a common meeting, if necessary. In case you have any questions, please do not hesitate to contact (ACER) Christophe Gence-Creux (Christophe.GENCE-CREUX@acer.europa.eu) and (ACER Electricity Working Group) Christine Materazzi-Wagner (Christine.Materazzi-Wagner@e-control.at).

Yours sincerely,

Christine Materazzi-Wagner

*Chairperson of the ACER
Electricity Working Group*



Christophe Gence-Creux

*Head of Electricity Department,
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