

OMIE consultation on Offer Typology In the MIBEL Day Ahead Market

Brussels, 15 May 2026

1. Should Scalable Complex Order (SCO) product continue?

Yes, we find it valuable and we support its continuity. The graphs included in Annex 1 of the consultation demonstrate that there are market participants within the MIBEL who make effective use of Scalable Complex Orders (SCO), Simple Block Orders, and Exclusive Groups of Simple Block Orders. This highlights that these products provide operational value to such participants and justify their continued use and availability.

2. Should Simple Block Order product continue?

Yes, see answer above.

3. Should Exclusive Group of Block Orders product continue?

Yes, see answer above

4. Should the use of the Linked Block Orders product be allowed?

Yes, the introduction of Linked Block Orders and Flexible Orders into the MIBEL would constitute a further step towards alignment with the European electricity market design, enabling market participants in Spain and Portugal to participate under conditions that are more consistent with those applicable in other bidding zones where these order types are already implemented. In addition, these products would provide MIBEL market participants with greater flexibility to reflect the technical and economic characteristics and constraints of their assets and clients, while improving the efficiency of order matching and market clearing. This could ultimately contribute to a more efficient day-ahead price formation process.

As a general comment, we think the learning curve of Iberian market participants cannot be disrupted by phasing-out products due to their limited use or not introducing additional ones. Innovative practices of market participants are a work-in-progress by nature, especially in the current very challenging market context and taking into account the storage and demand flexibility uptake.

Additionally, we believe that extending the use of all products to intraday auctions (IDAs) would be beneficial.

5. Should the use of the Flexible Order product be allowed?

Yes, see answer 11.

Furthermore, we consider it a valuable additional bidding possibility, depending on the duration of the bidding period. If limited to 15 minutes its applicability would be restricted, however a duration of at least 60 minutes would make it significantly more useful.

We also support the introduction of storage orders as announced by the Market Coupling Consultative Group. This new product should be made available in all bidding zones at the same time. Trading parameters in a bidding zone should allow trading for different types and durations of storage.

6. Would you find it interesting to allow the use of bids with hourly resolution?

Yes, hourly products represent a valuable additional trading option, particularly for market participants subject to operational constraints. The availability of hourly granularity in the Spanish short-term electricity market constitutes a relevant development, given that hourly products remain widely traded across other European jurisdictions. Furthermore, enabling hourly products within the SIDC continuous market could contribute to improving its liquidity. On the other hand, and according to the on-going monitoring reported in the EU stakeholder Committees, we recommend a close monitoring of the "sawtooth" effects.

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