# CONSULTATION RESPONSE

## Single day-ahead coupling (SDAC) products methodology review

Brussels, 18 June 2026

## General comments

We welcome the quantitative analysis on the usage of products by Member State performed by the NEMOs. This quantitative study helps better decision-making.

General comments on products availability in SDAC

1. We welcome maintaining block orders in the category of mandatory products for SDAC.
2. This list of mandatory products should be extended to linked bids and exclusive bids.
3. We ask to increase the availability of smart block orders and foresee new products enabling flexibility to be properly represented.
4. We suggest making all products available in Iberia.
5. 60' period orders should remain available because they support market participants to reflect scheduling constraints of certain assets under particular market conditions.

## Detailed comments

**1. Based on your current operational needs, do you agree that the existing suite of SDAC products (Mandatory and Optional) continues to meet the requirements of the market post-15' MTU go-live?**

- [ ] Strongly Agree
- [ ] Agree
- [ ] Neutral
- [ ] Disagree
- [ ] Strongly Disagree

**2. NEMOs analysis suggests that 60' Period Orders still account for a significant share of volumes and price steps in several countries. Do you agree that the 60' Period Orders should remain part of the "Mandatory Products" listed in the SDAC PM?**

- [ ] Yes
- [ ] No
- [ ] Undecided

**3. Do you agree with the NEMOs' assessment that removing 60' Period Orders would likely lead to an increase in Block Orders, potentially degrading algorithm performance?**

- [ ] Yes, the risk is high that removing 60' Period Orders will lead to replacement with numerous Block Orders.
- [ ] No, I believe 60' Period Orders will be replaced only with a very limited number of Block Orders.
- [ ] Neutral / Not enough information.

**4. Do you agree with the NEMOs' assessment that classifying 60' Period Orders as an optional offering would have detrimental performance gains in the case of being selected as a possible Corrective Measure?**

- [ ] Yes, the gain under a possible CM is considered detrimental.
- [ ] Yes, the gain under a possible CM is considered detrimental and a possible substitution by Balock Orders could increase the complexity of the SDAC Algorithm.
- [ ] No, I believe the algorithm could handle the shift.
- [ ] Neutral / Not enough information.

**5. How critical is the Minimum Acceptance Ratio (MAR) parameter in Block Orders for your asset scheduling and operational stability?**

- [ ] Essential (Cannot bid effectively without it)
- [ ] Useful
- [ ] Not very important
- [ ] Not used in my bidding strategy

**6. Do you agree with the NEMOs' proposal to keep the MAR parameter to prevent the fragmentation of the order book into many smaller Block Orders?**

- [ ] Yes
- [ ] No
- [ ] No opinion

**7. Simulation results showed that converting 60'/30' Block Orders into 15' equivalents did not improve significantly algorithm performance (TTFS). Do you agree that 60' granularity for Block Orders should be maintained?**

- [ ] Yes, maintain 60' granularity for Block Orders.
- [ ] No, move toward 15' standardization only.
- [ ] Undecided.

**8. Do you agree that the existing Corrective Measures (CMs) and optional product types provide sufficient tools for NEMOs to restore algorithm performance without reclassifying products?**

- [ ] Yes
- [ ] No
- [ ] I believe more restrictive measures are needed.

**9. NEMOs propose no amendments to the current SDAC Products Methodology at this time. Do you support this approach keeping the current status of the SDAC PM products and Order Types?**

- [ ] Yes, I support the proposal.
- [ ] No, I believe specific amendments are required.
- [ ] Neutral.

**10. Please provide any other feedback to be considered under the NEMOs evaluation for their relevant proposal to ACER/NRAs for SDAC PM. In particular, it would be helpful for NEMOs to understand the importance of 60' Period Orders to your organization and your level of readiness to transition away from them, if required.**

Detailed comments on 60' period orders availability

Only smart block products (i.e. linked blocks, exclusive group, flexible blocks) can today ensure the respect of technical constraints while providing the flexibility to the algorithm. Several flexible assets are operated on an hourly granularity, mainly due to technical constraints and safety reasons.

Indeed, it would be highly detrimental to remove the existing hourly product and replace it with only QH blocks (15-minute blocks). In fact, marker participants will inevitably be confronted with the following issues:

- block orders are subject to limits that do not apply to hourly orders. If hourly orders are subject to the same limits as blocks, market participants will lose flexibility on the way they bid the assets. Market participants with flexible assets would not be able to bid their full flexibility, which is diametrically opposed to the intentions behind the introduction of the 15min MTU products in SDAC.

- In certain bidding zones, many controllable assets can react very flexibly to short-term changes. However, most of them need to run permanently at an operating point in order to be able to absorb short-term load fluctuations, e.g. from renewable energies.
- During the time when the flexibility is not needed, these assets then produce energy at an operating point, although there is no actual demand. This will potentially displace clean, renewable, intermittent power generation and "burn" valuable energy sources (i.e. fossil fuels or limited resources in the case of hydropower), which is both environmentally and economically unreasonable and contrary to the goals of the energy transition.
- Moreover, the existing hourly product can clear partially (for only part of the volume). If it is replaced by a QH block, it will not be able to be clear partially but will paradoxically be rejected (PRB) instead. This would also remove flexibility for the assets and lead to an opportunity cost for market participants.

Conclusion

As things stand, market participants should have at their disposal the widest range of product offering, including 60 min products. Investment in Euphemia algorithm performance should be the priority.

Additionally, to mitigate the effects of increased complexity, market participants need sufficient time to complete their processes. Nomination deadlines need to be moved in line with the delay in results due to Euphemia's calculation time.

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