

Implementation of 96 trading rounds in the continuous intraday market

24 June 2026

General comments

Energy Traders Europe welcomes the opportunity to comment on the proposed resolution modifying the electricity market rules for the implementation of 96 trading rounds in the continuous intraday market.

Energy Traders Europe supports the implementation of the 96-gate framework as a necessary step towards full alignment of the Spanish market with the European 15-minute market time unit, the Single Intraday Coupling framework and the objectives of Regulation (EU) 2019/943.

The introduction of quarter-hourly continuous trading closer to real time should improve the integration of renewable generation, storage and demand-side flexibility while contributing to more efficient balancing and system operation.

While supporting the proposal overall, we would like to highlight the following points.

Objection period for day-ahead market results

The proposal reduces the time available for market participants from 10 to 5 minutes to submit objections regarding day-ahead market results.

We invite CNMC to explore other ways to improve the situation instead of tightening the slot to present objections.

We recognise that shorter timelines may be required in a quarter-hourly environment with tighter operational processes. Nevertheless, the right of market participants to identify and report potential issues remains an important safeguard for market confidence and transparency.

We therefore encourage CNMC to reassess whether the proposed timeframe provides sufficient opportunity for participants to perform the necessary controls and validations.

CONSULTATION RESPONSE



Additionally, we request an extended objections period in case full/partial decoupling is triggered and the regional auction is held.

Bid limitations and operational restrictions

The transition to a 96-period structure significantly increases market granularity and may require market participants to manage a substantially larger number of bids.

For this reason, any restrictions on bid submission capabilities should be objectively justified, proportionate, transparent, coordinated at European level, and subject to regular review.

Market design should continue to facilitate efficient portfolio optimisation and effective participation by all market actors, including renewable generators, storage operators, aggregators and independent traders.

In particular, the current limitation of 50 bids in a file should be released as soon as possible. For achieving this, market participants should know the relevant technical hurdles justifying this current limitation and an action plan from OMIE with specific milestones should be made public, including more IT investment and fine tuning of internal processes.

Corrective measures and exceptional interventions

The market rules foresee the possibility of corrective measures under exceptional circumstances.

EU procedure for partial decoupling in advance now used in Spain should facilitate that other bidding zones will hold the IDA1 without MIBEL and avoid cross-border impacts.

We remind that IDA1 is a voluntary market close to day-ahead and far from real-time without capacity recalculation. Therefore, we welcome the brand-new possibility to trade in the continuous intraday market once the decision to cancel IDA1 is made. However, more precise wording is required in rule no. 42.f) to ease the procedures of market participants.

We remind OMIE is not foreseeing a separate participation of just Spain or just Portugal in IDA1 and we consider that in case Spain or Portugal cannot participate in IDA1, it should not prevent that the other country, Portugal or Spain, from participating in IDA1.

CONSULTATION RESPONSE



Energy Traders Europe considers that such measures should remain exceptional, proportionate, non-discriminatory, coordinated at European level in the Market Coupling Steering Committee (MCSC) and fully transparent. Their application should be supported by clear criteria and accompanied by appropriate communication to market participants.

Entry into force

We very much appreciate all the tests in place communicated so far from both OMIE and TSO's side. 10 working days for entry into force once publication by OMIE and RED Electrica is insufficient for market participants. 15 working days would be sufficient for market participants. Additionally, a desirable go-live date would be in late September.

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