

Market Coupling Steering Committee consultation on storage orders in single day-ahead coupling (SDAC)

13 July 2026

General comments

Overall, we welcome the study and questionnaire on storage orders in SDAC. It is essential that SDAC liquidity and Euphemia algorithm complexity are tested before go-live. We encourage NEMOs & TSOs to assess and to share the impact of such product on Euphemia algorithm, especially in the context of ongoing discussions on corrective measures in the next Market Coupling Consultative Group.

With such a product, NEMOs would take some dispatch decision for flexible assets. Some market participants highlight that these products change the Euphemia algorithm because traders will have less optimisation and the algorithm will optimise assets to maximise welfare.

We highlight that there should be transparency on why certain NEMOs might introduce or not the new product if implemented in SDAC.

It is important that NEMOs keep and reinforce current complex products (optional). The list of mandatory products should be extended to linked bids and exclusive bids. We ask to increase the availability of smart block orders and foresee new products enabling flexibility to be properly represented.

The introduction of storage orders should neither hinder market performance nor trigger the need for corrective measures. In that context, it is worth considering whether the withdrawal of storage orders could itself constitute a corrective measure.

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Questionnaire

Do you use current order types (e.g. loop blocks) as a way to bid for energy storage systems?

(for Other, please explain)

- Yes
- No
- Other:

Would you use storage orders?

(for Other, please explain what are your concerns)

- Yes
- No
- Other:

Which types of storage systems would you intend to represent by the storage order?

Note: Simulations that have been done so far considered parameters representing only battery and hydro pump storage systems.

- Battery storage systems
- Hydro pump storage systems
- Other:

How much power in MW would you bid in a single storage order? Indicate your intended value, or if you assume that the power could differ a lot day-by-day then please indicate your expected min to max power range that you would use in a single storage order. (If you are involved in multiple bidding zones, please indicate numbers per individual bidding zone):

If you assume that the power in MW that you would bid in a single storage order would change in the coming years (beyond 2027 and further), please indicate the expected

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outlook. (If you are involved in multiple bidding zones, please indicate numbers per individual bidding zone):

How many storage orders would you use to bid in one day-ahead session (If you are involved in multiple bidding zones, please indicate numbers per individual bidding zone)?

*Would you combine different storage systems for submitting a single storage order?
(For Other, please explain)*

- Yes
- No
- Other:

Do the storage order input parameters, both "required" and "optional parameters", meet your needs to define a storage order?

(If not, please explain)

- Yes
- Other:

Do you find any other input parameter that should be available for the storage orders apart from the input parameters defined in the document?

It could be explored as optional parameter to add "Required state of charge (per period)".

Do you find any of the input parameters defined in the document as useless (i.e. you would not consider these parameters for bidding for a storage order)?

Regarding the optional input parameters of a storage order, are the default values indicated in the document fine for you?

(If not, please explain which values you prefer)

- Yes
- Other:

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Do you have any other comment to the input parameters?

Maximum energy stored (one per period – MWh)

Maximum input power (one per period – MW)

Maximum output power (one per period – MW)

Cycling costs (one per order – €/MWh)

Starting energy stored (one per order – MWh)

Minimum energy stored (one per period – MWh)

Efficiency (one per order – %)

Value given to energy stored at the end of the day (one per order – €/MWh)

Would it be acceptable for you that for a storage order a minimum size (power value in MW) would be imposed and only market participants could aggregate the storage systems themselves into a single storage order (i.e. only market participants' aggregation option would be available, not the NEMO aggregation with defining a storage order using baskets as defined above)?

Yes? please indicate which minimum power value (in MW) would be acceptable for you (currently considered options are 5 MW or 25 MW)

No? please explain

Other? please explain

It would be a clear usage limitation. The threshold should be set at the lowest level (e.g. 5 MW or lower). Currently storage assets smaller than 5 MW are operating in the EU market.

Would you have the need to define the storage order with lower size than the minimum size threshold (currently considered options for the minimum size are 5 MW or 25 MW), i.e. the market participants' aggregation option would not be possible for you?

Yes

No? please explain

Other? please explain

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Please see answer above.

Would you use the possibility to define the storage order using baskets for the storage orders with the power in MW below the minimum size (currently considered options for the minimum size are 5 MW or 25 MW)?

Yes

No? Please explain

Other? Please explain

Individual orders should be available for every market participant according to Regulation (EU) 2019/943.

Would the suggested baskets (i.e. the sets of the combinations of the values of the basket parameters) meet your needs for defining the storage orders that have lower size (in MW) than the predefined minimum MW threshold?

Note: for the exact values of the basket parameters to be defined please see other questions.

- *Yes*
- *No*
- *Other:*

See our responses of the questions below.

There is a simplification meaning that the basket parameters including Power (in MW) assumes that the input and output power (in MW) is equal. Is such simplification acceptable for you to define a storage order?

Yes

No? please specify which parameters would you prefer

Other? please explain

See our responses of the questions below.

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How many baskets (with different values) do you see necessary to be available for the market?

Basket 1: Power-to-capacity ratio (-)

Basket 1: Starting-volume-to-capacity ratio (-)

Basket 1: Efficiency (%)

Basket 1: Cycling cost (€/MWh)

Basket 1: End-of-day value (€/MWh)

Basket 2: Power-to-capacity ratio (-)

Basket 2: Starting-volume-to-capacity ratio (-)

Basket 2: Efficiency (%)

Basket 2: Cycling cost (€/MWh)

Basket 2: End-of-day value (€/MWh)

Basket 3: Power-to-capacity ratio (-)

Basket 3: Starting-volume-to-capacity ratio (-)

Basket 3: Efficiency (%)

Basket 3: Cycling cost (€/MWh)

Basket 3: End-of-day value (€/MWh)

Additional baskets:

Would you have any other comment regarding the baskets?

If you wish, please provide your further comments/considerations relevant to the storage orders:

Storage orders should be based on 15min MTU to ensure compatibility with all bidding zones if the impact assessment is positive and the product is introduced.

Preferably, no minimum bidding size should be introduced to enable market participants to bid for individual assets and to limit operational impact of aggregation and disaggregation.

Aggregation possibility for market participants must be offered in every bidding zone according to Regulation (EU) 2019/943, including central dispatch systems. Baskets managed by a NEMO should be a (temporary) last resort measure closely monitored by

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ACER and shall not be available in bidding zones where aggregation in the market is allowed.

Do you have any questions regarding the introduction of the storage orders (that could be answered during the planned webinar or also after the webinar during the next MCCG meeting (Market Coupling Consultative Group))?

No comments.

Would you be willing to be contacted for giving potential further elaboration on your answers if necessary?

Yes.

Contact

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