

Response to the amendments to the day-ahead and intraday electricity market rules for continuous intraday trading in 96 gates

Brussels, 19 February 2026

We support OMIE's alignment with European rules to allow trading as close to real-time as possible and at least up to the closing of intraday interzonal markets.

Rule 42.1.1 allows OMIE to decouple MIBEL before the first intraday auction (IDA1) if the viable daily schedule (PDVP) is not available on time, in order to protect market integrity, avoid failed coupled auctions, and ensure fair and orderly trading.

However, the rule does not describe other situations of decoupling not due TSO delays in providing information. In exchange, OMIE propose to reduce the timeline allowed to present objections to the day-ahead results (cf. Rule 58.1) by alleging this right is not used for years. We invite OMIE to explore other ways to improve the situation instead of tightening the slot to present objections. In any case, we remind that IDA1 is a voluntary market close to day-ahead and far from real-time without capacity recalculation. Therefore, operational security has priority over IDA1 cancellation. Moreover, we remind OMIE is not foreseeing a separate participation of Spain and Portugal in IDA1 and the fact other bidding zones are cancelling IDA1 due to OMIE decision could be questionable.

Further, OMIE takes the opportunity of the revision of market rules to reflect the possibility to apply corrective measures and bidding limitations:

- Limitation in number of bids inside a file for SDAC and IDAs. Recent OMIE announcement to market participants set the limit in 50 bids per file and justify this possibility under current rule in force no. 59.3. We oppose this measure because:

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- This limitation is not justified under the principles and situations set out in current rule 59.3.
 - OMIE intends to modify rule no. 15.1 in the current consultation to explicitly introduce this kind of limitation without any assessment of alternative measures and a benchmark of different practices across European NEMOs.
 - There is no justification of the threshold chosen in the OMIE notice to market participants. This threshold penalises bidding for wider portfolios with different technologies, disincentives use of different products, and impacts negatively in the operational security close to the gate closure time.
 - Level playing field should be preserved for Iberian market participants, specially by the fact that we are obliged to bid on unit-by-unit bidding for certain technologies and current market rules impede to configure portfolios differently than rules of the TSO's side requirements.
- RUC and RAD limitations in SIDC are currently in place since 2022 and stricter thresholds have been announced by OMIE. Discussion on the orders per ratio corrective measure at European level are ongoing. Different design and parametrisation of this measure at NEMO/BZ/market participant level should guarantee the level playing field at EU level and proportionate application of the measure. Other measures like changing the price thick size are also under evaluation.

In particular, current thresholds applied by OMIE are very low both in absolute and relative terms. It does not distinguish market participants needs in terms of asset management. Moreover, the current constraints in portfolio management for Iberian market participants increase the negative impact of the measure. According to our information OMIE parameters are much stricter than other NEMO's like EpexSpot and NordPool Spot. As commented for limitation in auctions, level playing field should be preserved for Iberian market participants.

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Contact

Lorenzo Biglia
Director for European Electricity Markets
l.biglia@energytraderseurope.org