



Eurelectric's view on EC's study on Intraday Market Design

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Our understanding of the conclusion:

- The ideal situation would be to have auctions very frequently
- But in reality, not possible => recommendation to have:
 - 15min CZ products
 - CZ auctions:
 - 1 opening auction
 - 1 evening auction
 - 8-12 additional auctions starting at mid-night (so an auction every 2-3 hours), with continuous remaining in between, possibly with simplified products

Eurelectric views

- CACM foresees the possibility to have ID capacity pricing. So far, sole way to address that has been ID auctions (despite call from market to envisage other options).
- Eurelectric takes note of the ACER decision, but...
 - Continuous and auctions extremely hard to combine (as shown by the current impasse). You have to go for either the one or the other, but some in-between design is clearly sub-optimal.
 - So time for a clear choice !
- Eurelectric disagrees with the study conclusion of some kind of 'compromise': market needs stability in its design. Already choices (i.e. XBID) are being made based on one design.
 - XBID is the result of the network codes, themselves being an outcome of market designs discussed with all parties, from 2009 FF.
 - Very costly to reorient afterwards.
 - From these perspectives, we would recommend continuing with the continuous.
 - Any change in the target would necessitate at least a sound impact assessment
 - Auctions decrease the liquidity of intraday market.
 - Study seems to be based on assumption that current continuous market is source of distortion without any evidence.
 - Benefit of instantaneous hedging brought by continuous market is not considered.
- **Target model in CACM = continuous ID market**

