NEMO questionnaire on SDAC Products Methodology Review

Eurelectric consultation response paper

June 2026

Public Consultation: SDAC Products Methodology Review

Market Participant & Stakeholder Questionnaire

This questionnaire is designed for Market Participants (MPs) and stakeholders to provide feedback on the **SDAC Products Methodology** analysis conducted by NEMOs for the period of October 2025 to February 2026 for the Usage of SDAC Products and Order Types. In alignment with the analysis, the focus is on validating the NEMO's proposal to maintain the current methodology without amendments.

Please select the most appropriate response for each of the following items.

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
- [X] 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?

- [X] 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?

- [X] 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?

- [X] 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?

- [X] 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.
- [X] 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.

Eurelectric welcomes the opportunity to respond to this public consultation about the SDAC Products Methodology. We also thank the all-NEMO Committee for releasing a comprehensive explanatory document and conducting a public webinar on this topic.

Considering the importance of the 15' MTU project for the SDAC and for market participants, Eurelectric would welcome further information on the assessment of algorithmic performance and market dynamics since the 15' MTU go-live. We would therefore like to request that N-SIDE be invited to an upcoming MCCG meeting to present results comparing algorithmic performance before and after the go-live.

In general, Eurelectric agrees that the removal of 60' Period Orders and of 60' Block Orders or their classification as optional products risks leading to an increase in simple and complex Block Orders, considering their widespread usage in certain Member States. We therefore welcome NEMOs' proposal to maintain the current classification of 60' Period Orders as mandatory products. We also note that the Minimum Acceptance Ratio parameter in Block Orders remains essential for a number of market participants. However, we do not feel that we have enough

information on algorithmic performance to evaluate whether a potential increase in block orders (or any other product) would lead to a degradation in performance.
In general, Eurelectric regrets that, following an ACER Decision, Complex Block Orders have been classified as optional products. Indeed, Eurelectric considers that products such as linked, exclusive and loop blocks orders should instead be classified as mandatory, as they are necessary to accurately reflect the technical capabilities and constraints of assets and portfolios in the day-ahead auction. This, in turn, benefits consumers by enabling an efficient and competitive bidding process leading to an efficient dispatch. Eurelectric would therefore support the inclusion of such products in the list of mandatory products.
While we lack real-world experience on the algorithmic performance impact of corrective measures, Eurelectric would like to remind that their application would have severe detrimental impacts on market efficiency and should therefore be considered as a last resort only. We therefore encourage NEMOs and TSOs to investigate new, less disruptive corrective measures.

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent a total of +3500 companies in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:
- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

WG Market Integration & Network Codes

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