

All NEMOs Consultation questions

From this document you can provide your comments on the following four proposals that the NEMOs must submit to the NRAs by Mid-February:

1. Algorithm Proposal, incorporating the Day-Ahead and Intraday requirements
2. Products Proposal
3. Back-up Methodology Proposal
4. Harmonized Max-Min Price Limit Proposal

This consultation questions form intends to gather related view, arguments, positions and assessment proposals from stakeholders. It consists of both very open and relatively specific questions on each of the proposed methodologies. Some questions may only appeal to certain market actors. We are grateful for your response and partial answers are also very welcome. Please relate your comments to the provided questions, where possible.

Please remember to send your contribution to consultation@nemo-committee.eu by 2 December at the latest. Do not forget to fill in the 'Respondent's information' on the first page of this consultation form too.

In case you would have any questions or remarks, do not hesitate to [contact us](#) directly.



Respondent's information

1. What is your name?

ENTSOE

2. What organization do you represent?

All TSOs

3. What is your email address?

market@entsoe.eu



Algorithm Proposal, incorporating the Day-Ahead and Intraday algorithm requirements

Algorithm proposal

1. Do you have comments on the proposal to base the SDAC and SIDC on the PCR Euphemia and XBID algorithms?

All TSOs support the proposal to base the SDAC and SIDC on the PCR Euphemia and XBID algorithms

2. Do you have comments on the emphasis in the Proposal on monitoring and maintaining algorithm performance?

For all TSOs, performance requirements, like deadlines for delivering coupling results, are all TSOs requirements in accordance to the Article 37(1) and shall be included as a minimum in all TSOs' requirements.

In the current version of the consultation document it is stated that "Performance shall be controlled and measured by the NEMO Committee against criteria to be set in consultation with the Market Electricity Stakeholder Committee (MESC)." And "The NEMO Committee shall promptly inform all TSOs of any non-compliance with a TSO-owned or joint TSO/NEMO-owned Algorithm Requirement and shall cooperate with TSOs to resolve any such non-compliance. "

While the document refers to TSO requirements on the performance, these performance indicators are not described in the Algorithm Proposal nor in the DA/ID requirements. Meaning effectively that TSOs cannot monitor the performance of the DA/ID market coupling. Moreover, it seems that TSOs will not be implicated in the process to define the criteria mentioned in the above text. Respecting that performance is joint requirements from TSOs and NEMOs, all TSOs will expect that this part will be amended accordingly. All TSOs are willing to develop these performance indicators together with all NEMOs reflecting CACM requirements of Article 37(1a).

Finally, the NEMOs establish a process to ensure adequate performance in the change request procedure (by setting usage limits), but the Algorithm Proposal lacks a description of measures which will be taken by NEMOs in case performance issues are encountered during natural evolution of the complexity (i.e. increase in orders). In other words there is a need for a procedure or process to handle performance issues both for DA and ID.

3. What should be the critical parameters of algorithm performance (DA; ID)?

Performance shall monitor that algorithm meets the objectives of CACM regulation all the time especially monitoring how requirements for maximisation of economic surplus, for efficient price formation, for respecting cross-zonal capacity and allocation constraints and for repeatability and scalability are met against the deadlines for the delivery of SDAC/SIDC results.

4. Do you have comments on the proposals for transparency regarding the algorithm (public description, performance and incident reporting, consultation on changes)?

All TSOs support all NEMOs aim to publish public description of algorithm requirements but would like to remind that Algorithm Proposal should also include adequate description of algorithm in order all TSOs to ensure that Algorithm Proposal complies with Article 37(1a).

All NEMOs should consider maintaining a public internet pages where regular performance and incident reporting exist to all stakeholders.

All NEMOs shall reconsider process for consultation of changes only through MESC and not applying wider consultation. Furthermore, interface to day-to-day management of Article 10 within this change consultation shall be clearly defined.

5. Do you have comments on the proposals for controls on usage and change requests for new functionality, to maintain DA and ID algorithm performance?

It is not clear how NEMOs will ensure an objective and non-discriminatory treatment of change requests. The criteria by which this decision shall be taken are not described in the Algorithm Proposal and do not seem to fall under the transparency topic.

In the Algorithm Proposal the NEMOs introduce the notion of Usage Limits. It is not clear whether allocation constraints (such as FB constraints, ramping constraints etc) fall under this. This would mean that NEMOs could impose a limit on the number of constraints applied during capacity allocation. This might lead to non-compliance with the CACM requirements without all TSOs ability to interfere.

In addition, it is not clear how NEMOs will prioritize between different requirements. Could a usage limit for certain functionalities impact the timings set forth by the CACM regulation, e.g. merging of two regions with applied flow based?

In this regard it is not clear how the governance to decide usage limits will be. If this is something that lies under article 10 of CACM regulation for day to day management of the algorithm or if it lies under article 37 where the NEMO committee has a more central role in the governance. Hence it needs to be clarified how NEMOs will prioritize between different requirements and this prioritization should not hamper the implementation of the TSO requirement on the algorithm that have been defined according to article 37(1a) in CACM regulation.

Additional to performance it is utmost important that the algorithm is able to reproduce results. By this we mean that the same input (bids, allocation constraints etc) must produce the same output including prices per bidding zone and overall welfare. This reproducibility must be monitored and reported to TSOs and NRAs on a monthly basis.

6. Do you have comments on the proposal to manage changes to the algorithms, or should all changes require a modification using the procedure outlined in CACM (Articles 9 and 12)?

TSOs welcome the proposed change request procedure and acknowledge that any change request impacting the Algorithm Requirements should follow existing CACM procedures. However, special attention shall be taken to categorise the change requests and to ensure transparency to stakeholders in this respect.

Considering the categorisation of change request, some questions are still open:

- How will an impact on market parties be determined, are there any criteria that NEMOs have in mind?
- If there is a direct impact on TSOs or post coupling processes performed by TSOs, will they be consulted?
- “The NEMO Committee shall determine on a case-by-case basis which approach is most suitable.” Do this also apply on TSO change request or joint NEMO-TSO change requests?
- And how is the link between these articles and article 10 of the CACM regulation that lays down the principle of day to day management of the DA and ID markets?

7. NEMOs propose a formal escalation body where NEMO decisions (taken on the basis of QMV) can be challenged. This is relevant because some algorithm issues may involve conflicting NEMO, TSO or MS priorities. Do you have comments on the proposal to consult with the MESC? Should NRAs or ACER potentially play a role in resolving conflicts (e.g., acting as the arbitral body for NEMO decisions), or is an independent arbitral tribunal adequate? Do you have any other comments?

How will the arbitral tribunal be set up? If the participation of NEMOs in this tribunal reflects the constitution of the NEMO Committee, then how can it be ensured that a decision taken by QMW will not be just repeated by the tribunal?

8. Do you have any other comments on the Proposal?

Regarding the algorithm proposal in accordance with Article 37 of the CACM Regulation, all TSOs want to stress that the proposal does not describe the algorithm. For this reason, all TSOs cannot ensure in accordance with Article 37(3) of the CACM Regulation that the proposal complies with the all TSOs' requirements set in Article 37(1) of the CACM Regulation. Furthermore, all TSOs would like to draw to the attention of NEMOs that the interface between Article 37 (algorithm development) and Article 10 (day-to-day management) of the CACM Regulation should be clearly stated in this proposal in order to further clarify the governance of the change management. Specifically, the relation to the day-to-day management under Article 10 of the CACM Regulation must be clarified. This is specifically important for TSO requirements.

The Algorithm Proposal often refers to a possible consultation with the MESC and states that the exact form of consultation shall be agreed with the MESC. Why is there not a proposal of this consultation process included in the Algorithm Proposal and how NEMOs ensure that consultation covers relevant stakeholders?

Performance indicators should not exclusively be set by NEMOs but also by TSOs as e.g. in recent weeks there have been several situations with a potential decoupling in CWE. Thus article 2 (4) definition shall be changed to: Algorithm Performance: means the ability of the DA or ID Algorithm to provide in the timeframe allowed in production reliable and valid quality results plus any other performance indicators established by the NEMO Committee and TSOs.

Additional to performance it is utmost important that the algorithm is able to reproduce results. By this we mean that the same input (bids, allocation constraints etc) must produce the same output including prices per bidding zone and overall welfare. This reproducibility must be monitored and reported to TSOs and NRAs on a monthly basis.

Day-Ahead Algorithm requirements

1. Do you have comments on the proposed DA Algorithm requirements – 1. Background?

2. Do you have comments on the proposed DA Algorithm requirements – 2. Terminology?

All TSOs propose to rename this chapter as 'Definitions'

3. Do you have comments on the proposed DA Algorithm requirements – 3. Approach?

4. Do you have comments on the proposed DA Algorithm requirements – 4. Price coupling algorithm requirements-Title 1- Requirements on functionalities and performance?

All TSOs propose to have more details about performance indicators in final proposal. This work shall be done in co-operation between all NEMOs and all TSOs.

5. Do you have comments on the proposed DA Algorithm requirements – 4. Price coupling algorithm requirements-Title 2- Requirements related to Cross-zonal capacities?

All TSOs propose to change requirement 1h from

“ensure that PTDF multiplied by net position is less than RAM for each network element and net positions concerned by the flow-based parameters for flow-based approach;”

To

“ensure that PTDF multiplied by net position is less or equal than RAM for each network element and net positions concerned by the flow-based parameters for flow-based approach;”

6. Do you have comments on the proposed DA Algorithm requirements – 4. Price coupling algorithm requirements-Title 3- Requirements related to allocation constraints?

7. Do you have comments on the proposed DA Algorithm requirements – 4. Price coupling algorithm requirements-Title 4- Requirements related to balance constraints?

8. Do you have comments on the proposed DA Algorithm requirements – 4. Price coupling algorithm requirements-Title 5- Requirements on algorithm output and deadlines for the delivery of single day-ahead coupling results?

All TSOs have the position that all TSOs should have the possibility to request the volumes of the matched orders and unmatched orders (and bidding curves) of each NEMO for each bidding zone. This information is required as an input to analysis of curtailment situations (and close to curtailment situations) and security assessment. TSOs need to have this information to see how big the margin is in every bidding zone when we are close to curtailment as well as see how big volume that were not matched in a curtailment situation. TSOs and NEMOs shall agree on a process and timing to provide these data.

It is important for all TSOs that outputs are defined for each NEMO trading hub per bidding zones and per scheduling area. All TSOs propose to change Article 4 (7b) as:

per NEMO Trading hub: net volumes, aggregate matched hourly orders, matched complex, block, merit and PUN orders and in addition where there are several scheduling areas included in a NEMO Trading hub: the net volumes, aggregate matched hourly orders, matched complex, block, merit and PUN orders for each scheduling area

NEMO trading hub is interest of NEMOs and likewise Scheduling area are in interest of TSOs.

For change of bidding zones, the TSO proposal is in line with already agreed procedure in MRC price coupling (ref. point 6 under this Title) and all TSOs are wondering why there is comment in italics in the document.

All TSOs would like to reserve opportunity to come back with comments related to point 3 (scheduled exchanges) to ensure consistency between these requirements and TSOs' proposal for methodology for calculating scheduled exchanges when this proposal is submitted for NRAs approval.

9. Do you have comments on the proposed DA Algorithm requirements – 4. Price coupling algorithm requirements-Title 6- Currency?

Intraday Algorithm requirements

1. Do you have comments on the proposed ID algorithm requirements – Title 1: General requirements?

All NEMOs have not included in consultation package the description of ID algorithm, like it has been done for DA algorithm.

All TSOs propose to have more details about performance indicators in final proposal. This work shall be done in co-operation between all NEMOs and all TSOs.

2. Do you have comments on the proposed ID algorithm requirements – Title 2: Requirements related to Cross-zonal capacities?

Editorial remark: text “ensure that PTDF multiplied by net position is less than RAM for each network element and net positions concerned by the flow -based parameters for flow-based approach” shall be point ‘g’ and points after this have to be changed accordingly.

All TSOs propose to change requirement 1 f from:

“ensure that PTDF multiplied by net position is less than RAM for each network element and net positions concerned by the flow-based parameters for flow-based approach; “

to

ensure that PTDF multiplied by net position is less or equal than RAM for each network element and net positions concerned by the flow-based parameters for flow-based approach;

3. Do you have comments on the proposed ID algorithm requirements – Title 3: Requirements related to allocation constraints?

4. Do you have comments on the proposed ID algorithm requirements – Title 4: Requirements on algorithm output and deadlines for the delivery of single intraday coupling results?

For change of bidding zone, it must be consistency between DA and ID. Therefore, the requirement of 4 weeks in DA must also be valid for ID (ref. point g under this Title).

All TSOs propose that this Title has to be revised after consultation in co-operation between all NEMOs and all TSOs to ensure transparency, information needs for post-processing and needs for monitoring in accordance with Article 82 of CACM Regulation.

All TSOs would like to reserve opportunity to come back with comments related to point c (scheduled exchanges) to ensure consistency between these requirements and TSOs’ proposal for methodology for calculating scheduled exchanges when this proposal is submitted for NRAs approval.

5. Do you have comments on the proposed ID algorithm requirements – Title 5: Currency?

6. Do you have any other comments on the ID algorithm requirements?



Products Proposal

1. Do you have comments on the proposed DA and ID Products, including the categorisation of whether they are required at the start of operation of the SDAC/SIDC or at a future date?

The proposal for DA timeframe includes only products that shall be supported from the implementation of the SDAC and there are no products supported at a future date. Article 2(2) states that “All other products shall be implemented [within 6 months] following validation by the NEMO Committee of the detailed requirements and acceptance of any change request for Implementation of any required new or modified functionality, in accordance with the Algorithm Proposal “ but this proposal does not name any product, which shall be implemented at a future date. All TSOs propose to delete Article 2(2) or include in list of Article 2(1) such future products.

Same comment applies to ID timeframe in Article 3(2) as product 1.7 “Non-standard products as required under Article 65 to the extent that this is technically feasible and approved by the competent regulatory authorities” is merely extract from the CACM regulation and should be deleted or substituted with non-standard product to be delivered in future (including main features of this product).

All TSOs welcome short timeframe (quarterly, half-hour) products as it gives market participants more flexibility to adjust their balances in ID timeframe and thus possibility for them to balance themselves during real-time operation impacting positively to operational security. All TSOs believes that products with finer time resolution (Half-hourly Orders, Quarter-hourly Orders) for Single Day Ahead Coupling may be required in the future. The timing of the implementation of these products are still unknown but we think that NEMOs should already now start to assess the possibility to implement these short timeframe products for SDAC and the potential impact on performance.

Effects of proposed products against overall performance of algorithm shall be analysed by NEMOs.

2. The NEMOs believe that the technical specifications of the different products are better explained in separate public documentation, which can be more readily updated if needed. Do you have comments on this approach?

At least main features of each product have to be described in legally binding document. More detailed descriptions are beneficial also, but it would be very difficult to find out later on what kind of products were actually approved if main features of these products are not included in the approved document.

All TSOs support to have more details in separate public documentation, but would like to note in current public document (as delivered along with consultation documents) might still be too high level for this purpose.

3. Do you have comments on the proposed process to enable new products, or should all changes require a modification using the procedure outlined in CACM (Articles 9/12 and 40/53)?

It is important to have review process as described in the CACM regulation as it ensures participation of all relevant stakeholders (market participants, TSOs and NRAs) in this review process. Furthermore, it ensures that market participants have possibility to comment that available products reflect their needs, all TSOs that the available products take into account operational security and all NRAs that the available products comply with the objectives of this Regulation. As NEMOs intend to use this consultation as first review, we should have expected that the above mentioned aspects would have been better reflected in this proposal accompanied by such review document. All TSOs have not seen such review document and are hesitant to agree that this consultation would substitute such review as requested in Article 40(3) of CACM regulation.

4. Do you have any other comments on the Proposal?

The CACM regulation requests that NEMOs shall submit a joint proposal concerning products. The CACM regulation does not request provide for Product Methodology as many places mentioned in the NEMOs' proposal.



Back-up methodology Proposal

1. Do you have general comments on the proposed Back-up Methodology for single day-ahead coupling and for the single intraday coupling?

All TSOs note that it is very difficult to evaluate proposed backup methodology as it misses clear legal provisions for backup methodology, which should ensure that normal operation of SDAC/SIDC can continue as long as possible without partial or full decoupling and launch of the fallback procedures. Furthermore, proposal should describe clearly the processes where backup methodology is applied and what kind of backups are required. This kind of descriptions can be delivered e.g. in supporting document, which would clarify normal process and how operation of this normal allocation / matching process will be ensured by backup methodology.

All TSOs would like to limit their tasks and / or responsibilities within this methodology only to the backup communication channels for cross-zonal capacity provision and validation, in order to ensure that cross-zonal capacities are available through backup communication channel in case primary communication does not work, and to ensure that backup validation communication channel is available from all TSOs side during validation of cross-zonal capacities in case primary communication channel fails.

The proposal includes paragraphs, which should either be deleted or amended:

- delete paragraphs explaining what this section describes, such as para 1 and 6 (p.6), 11 and 16 (p. 7) etc. as heading of chapters should already reflect what is the content of the chapter
- paragraphs 'this common backup methodology shall be followed...', such as para 5 (p.6), para 10 and 15 (p.7) etc. shall be deleted or substituted by common article where obligations to relevant parties shall be set (not only that parties have to follow).

It is unclear in many places of methodology if paragraphs related to 'every problem in this process will be analysed ...' means real time actions or requirements for post analysis (e.g. para 19 and 24 in page 8, para 28 and 33 in page 9). NEMOs shall clarify the process for such analyses.

The backup methodology shall be considered also in case of multi NEMOs and when coordinated capacity calculator starts providing the capacities for allocation. This might mean change of communication channels and information provision and also change in TSOs responsibilities.

2. Do you have specific comments on Article 3-the 'SDAC backup procedures and steps' of the proposed Back-up Methodology for single day-ahead coupling and for the single intraday coupling.

See above

3. Do you have specific comments on Article 4-the 'Intraday timeframe price coupling algorithm backup procedures and steps' of the proposed Back-up Methodology for single day-ahead coupling and for the single intraday coupling.

See above

All TSOs note that provisions under 'requirement for backup system unavailability process' in page 15 are missing.



Harmonized Max-Min price Limit Proposal

1. Do you find that the proposal addresses all the relevant objectives and issues that it should?

- If not kindly list key issues not covered, and motivate why they should:

In Article 1.8 all the relevant objectives of the CACM Regulation are mentioned. However, with regard to Article 1.8.3 the impact of the Max-Min price limits on capacity calculation is not clear. Moreover, with regard to Article 1.8.4 the fulfillment of the objective “ensuring fair and non-discriminatory treatment of TSOs, NEMOs, the Agency, regulatory authorities and market participants” is not clear. In general, it should be clarified that in the case of derogations or temporary arrangements the objectives might be only partially met.

Article 1.8.1 states that the Harmonised Maximum Clearing Price limit shall take into account the Value of Lost Load (VoLL). The proposal does not include any reference to the estimation of the VoLL, and during the telco between NEMOs and TSOs on the 26.10.2016, the NEMOs clearly stated that the proposed price limits do not consider an estimation of the VoLL. If this has changed, a reference to the estimation of VoLL should be stated.

2. In the proposal being consulted upon two different levels are indicated as possible price limits to apply in the Single Intra Day Coupling (SIDC), one like proposed for Single Day Ahead Coupling (SDAC) and one with a wider range. The reason being that SIDC, contrary to SDAC (Implicit Auction), is based on continuous trading and matching of individual orders based on a continually, for each Bidding Zone, visible best bid/ask spread and accordingly there is no clear relevance for limits other than on technical grounds.

On that basis we have these specific questions linked to the price limits to be applied:

- Do you have any opinion about if the price limits set for Single Day Ahead Coupling (SDAC) and Single Intra Day Coupling (SIDC) should be identical or different?

In order to maintain compatible price formation and consistent price signals for the Day Ahead and Intraday timeframe price limits should be identical.

However, during the Intraday timeframe and closer to the operations hour, the value of the electricity might increase (decrease) to higher (lower) levels than in the Day-ahead timeframe, e.g. in a situation where the wind and solar forecast is wrong. The shorter lead times in the Intraday timeframe might lead to lower flexibility and higher opportunity costs for generation but also for load curtailment. Consequently, the VoLL in the Intraday time frame could be higher and as a result price limits should be chosen accordingly. To maintain consistent levels of price limits for SDAC and SIDC the price limits for SIDC should at a minimum be the same as the price limits set for SDAC.

Moreover, lower price limits in the Day Ahead timeframe could lead to a withholding of bids in the Day Ahead allocation in extreme scarcity situations and hence result in operational risks.

- If you argue for different levels can you kindly provide reasoning for why that should be the case:

- Do you have any opinions about the limits proposed for SDAC? If you disagree with the proposed limits what would you deem as more appropriate limits and can you elaborate on why?

Since today most power systems in Europe are characterised by excess generation capacity price limits might be sufficient in most hours of the year in the short-term. However, in times of scarce generation capacity (as seen in France in recent weeks) the proposed price limits might be too low and hence form a price cap. According to the European Commission price caps in wholesale electricity markets should be abolished in order to not hamper free formation of prices.

Since price limits should take into account an estimation of the VoLL the chosen price limits should be justified in this regard.

- Do you have any opinion about either of the options (A: +3000/-500; B: +9999/-9999) proposed as limits for SIDC? If you disagree with both sets of proposed limits what would you deem as more appropriate limits and can you elaborate on why?

Same as for SDAC.

3. Do you have any suggestions on how to over time tackle the required need to consider the limits in relation to Value of Lost Load (VoLL)?

- Further, do you have a suggestion on how to in relation to price limits tackle the fact that there is no uniform VoLL across the EU?

All TSOs believe that a clear link between the maximum and minimum prices and the Value of Lost Load (VoLL) has to be established as the CACM Regulation requests that the proposal shall take into account an estimation of the VoLL. As a pragmatic solution, all TSOs propose to work on this issue in more detail before the next report (in 2 years) in accordance with Article 82(2)(e) to define a common understanding of the VoLL and related criterion. As current prices are proposed, the proposal should include a clear roadmap to take into account an estimation of the VoLL with the objective better aligning maximum price with the VoLL.

The NEMOs excused the missing reference at a telco on the 26.10.2016, and argued that it is not possible to base the min-max to VoLL as VoLL is dependent on national sensitivities and geographical, temporal, technical and economic specificities. The idea behind the European single market is that electricity is produced at lowest possible costs, and consumed in areas which values the electricity the highest, an VoLL at national levels is not relevant. The harmonised minimum and maximum prices should be based on the European VoLL, which should be defined in becoming years (highest, average or lowest VoLL on European level).

Accordingly, a definition should be included in Article 2.

4. While the Proposal clearly says that harmonised limits shall apply for SDAC and SIDC respectively it also allows for derogations based on two options, namely (a) an agreement between relevant NEMOs and TSOs and approval by NRAs (Article 6.1), or (b) temporary derogations decided upon by the All NEMO Committee (Article 6.3), and for both options it may be valid in single

Member States, Bidding Zones and regions or the whole SIDC or SDAC geographic scope if due consideration is made of the impact on the objectives of the regulation.

- What is your view on the derogation option in Article 6.1?

In general all TSOs don't agree to have derogations that can lead to non harmonised maximum and minimum prices. If derogations were to remain in the proposal the process should clearly identify:

- what are the conditions to apply derogations;
- what are the steps to go back to the normal situation with harmonised maximum and minimum prices; and
- what are the consequences for other bidding zones and measures to mitigate non-harmonisation of maximum and minimum prices.

Moreover, it should be clarified how the impact on the objectives of Article 3 would be considered and how negative effects could be prevented.

If it is foreseen to use temporary arrangements to take into account the VoLL the description of the criteria and process should be extended accordingly.

The derogation in one bidding zone will have an effect on adjacent bidding zones as well, and if derogations were to remain the neighbouring TSOs, NRAs and NEMOs should be consulted, and possible negative effects should be included in an assessment.

- What is your view on the temporary derogation option in Article 6.3?

In general all TSOs don't agree to have temporary arrangements that can lead to non harmonised maximum and minimum prices. If temporary arrangements were to remain in the proposal the process should clearly identify:

- what are the conditions to apply temporary arrangements;
- what are possible exceptional circumstances and how will the risk that the price limits will be repeatedly reached be assessed ex ante;
- what are the steps to go back to the normal situation with harmonised maximum and minimum prices; and
- what are the consequences for other bidding zones and measures to mitigate non-harmonisation of maximum and minimum prices.

If it is foreseen to use temporary arrangements to take into account the VoLL the description of the criteria and process should be extended accordingly.

Temporary arrangements in one bidding zone will have an effect on adjacent bidding zones as well, and if temporary arrangements were to remain the neighbouring TSOs, NRAs and NEMOs should be consulted, and possible negative effects should be included in an assessment.

- What is your view in general about possible existence of derogations, and do you find that, when such decisions are made, the measures proposed to ensure consideration of overall objectives are sufficient?

See comments on derogations and temporary arrangements above.

All TSOs do not agree to have temporary arrangements.

A decision on derogations should never be made purely from NEMOs without cooperating with TSOs and approval of NRAs.

The document does not clearly state, if derogations were to be made, the conditions behind it.

5. Do you have other specific feed-back on this Min-Max Proposal?

TSOs related processes such as balancing, procurement of balancing services are impacted by the maximum and minimum prices. Thus TSOs see it very important that co-operation between NEMOs and TSOs is in place whenever derogations are under consideration.

Also the other timeframes (effects to e.g. risk hedging) should be taken into account when setting the price limits.

The proposal generally includes a significant number of spelling errors, wrong references to other sections, a lack of consistency in the use of terms, and missing explanations of abbreviations, which makes the proposal difficult to read.