



European Federation
of Energy Traders
SO YOU CAN RELY ON THE MARKET

Amstelveenseweg 998
1081 JS Amsterdam

Phone: + 31 20 520 7970
Email: secretariat@efet.org
Website: www.efet.org

Julio Quintela Casal

Commission de Régulation de l'Énergie (CRE)

Nico Schoutteet

Commission de Régulation de l'Électricité et du Gas (CREG)

By email

17 April 2020

Subject: Publication of aggregated day-ahead bid/offer curves in CWE and beyond

Dear Julio, dear Nico,

On behalf of EFET, I would like to thank you for picking up our request of 24 October 2019 with respect to the publication of aggregated day-ahead bid/offer curves in the CWE region.

As a reminder, our request to the NEMO Committee aimed for all NEMOs active in the region to publish common aggregated (and anonymised) bid/offer curves based on orders of all participants in the day-ahead market for each bidding zone of the CWE region. Indeed, without aggregated bid/offer curves taking account of all orders submitted to all the NEMOs of the region, market participants cannot properly understand market fundamentals.

We welcome the involvement of CWE NRAs following the request of the NEMO Committee for guidance from regulators on the subject. We hereby react to the call for comments on the regulators' proposal at the CWE flow-based Consultative Group meeting of 4 April 2020.

1. **Time granularity of the publication:** we agree with NRAs that the publication of aggregated bid/offer curves should be done per MTU, i.e. for each hour (until smaller granularity products are introduced in SDAC).
2. **Publication of aggregated information on block bids:** in addition to the publication of aggregated bid/offer curves, we request the continued publication of blocks bids, however, this time on an aggregated basis for all NEMOs. At the moment, market participants receive from NEMOs two files - one file with the bid/offer curve and another with the block bids, albeit not in an aggregated format. We would recommend the continued publication of two files, but this time on an aggregated basis - one file with the bid/offer curve and another with the block bids, including all details of the family links. If new types of blocks are included in the coupling in the future, they should also be available in the publication.
3. **Geographical scope of the publication:** we agree with NRAs that the publication of aggregated bid/offer curves should be extended beyond the CWE region and apply to the whole SDAC area. However, we attract the attention of the NRAs to the fact that publication practices currently vary from one region to the other. In the Nordic region, due to the rather small size of bidding zones, bid/offer curves are published at the level of Member States. We understand this practice aims to avoid the possible identification of market participants' bidding behaviour in small bidding zones with a low number of market participants. Hence, if the aggregated bid/offer curves rule is to be applied throughout SDAC, the level at which publication should be done should be the bidding zone (default rule), unless such publication could be damaging for market integrity, in which case publication could be aggregated at Member State level (exception).
4. **Anonymisation of information:** we agree with the NRAs' approach of full anonymisation of market participants' information in the publication. Should NRAs desire to have more information for market monitoring purposes, this information can be retrieved from the NEMOs directly or via data submitted by market participants to the REMIT platform.
We also agree with NRAs that information on which NEMO platform the orders have been entered into does not need to figure in the aggregated bid/offer curves.
5. **Disappearance of single-NEMO bid/offer curves:** we agree with NRAs that once aggregated bid/offer curves start being published, NEMOs should cease the publication of individual bid/offer curves taking sole account of orders placed on their platform.

6. **Timing of the publication:** the aggregated bid/offer curves shall be published right after day-ahead clearing in D-1, according to current practice in CWE. Once again, we attract the attention of regulators to regional specificities in case this rule is to be applied to the whole SDAC area. In Iberia, due to the prolonged application of unit bidding in the day-ahead market – a practice that EFET has long contested and continues to oppose¹ – publication of bid/offer curves is done 90 days after day-ahead clearing to avoid too easy a linking of individual unit bids with market participants. Until the Iberian markets switch to portfolio bidding in day-ahead, we indeed consider it difficult to provide the level of transparency that the market would need in D-1. We see this as one more reason to do away with unit bidding in Iberia and move to portfolio bidding.
7. **Publication channel:** we would favour continuing to use existing communication channels for the publication of the aggregated bid/offer curves, rather than creating new ones. One solution could be for the NEMO in charge of operating market coupling to draw the information from PCR and proceed to the anonymisation of data (market participants and NEMOs). The anonymised bid/offer curves could then be transmitted to all other NEMOs. All NEMOs could then publish the same information at the same time via their existing communication tools.

We remain at your disposal to discuss this matter further.

Best regards,



Jérôme Le Page
Chair of EFET Electricity Committee

¹ See our latest statement on the subject in our comments to the MINETAD consultation on day-ahead and intraday market rules, dated 8 February 2018 and available at:
<https://efet.org/Files/Documents/Downloads/EFET%20comments%20on%20the%20Minetad%20proposal%20on%20DA%20and%20ID%20power%20market%20rules.pdf>.