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cc:

Florian Ermacora
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Christophe Gence-Creux
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NRAs, TSOs, NEMOs and Market Participants of the MESC

By email

24 October 2019

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

Dear Cosimo,

Following our conversation at the last MESC meeting, we are reaching out to you with respect to the publication of day-ahead bid/offer curves in the CWE region.

In July 2019, the CWE Multi-NEMO Arrangement (MNA) entered into force. This arrangement, mandated by the CACM Regulation, aims to clarify the relationship between different NEMOs (Nominated Electricity Market Operator) in CWE day-ahead coupling. However, **the entry into force of the CWE MNA creates a new, unexpected setback for the market in terms of transparency of publication of the bid/offer curves of D+1 (post results).**

Prior to the go live of the CWE MNA, bid/offer curves for the day-ahead market were published around 13:30 CET on D-1 by EPEX Spot. Those curves would take into account all (aggregated and anonymous) orders (bid and offers) submitted by market participants on the EPEX day-ahead exchange. Publications would include not only hourly orders, but also block bids/offers submitted by all actors.

EPEX Spot continues to publish this information as they did as previously. However, since they are not the only NEMO active in the CWE region anymore, the bid/offer curves published by EPEX Spot only take account of orders from their own members. Other exchanges in the region also publish the bid/offer curves of their members – or intend to do so. EXAA (for Austria only) already publishes the aggregated bid/offer curves of their members. Nord Pool Spot has indicated they will publish the aggregated orders of their members as soon as there are more than 5 members in their order book, and if none of their members represent more than 50% of the order book (in order to ensure that such publication does not threaten the confidentiality of individual market participants' trading practices).

While we fully support the implementation of the MNA in the CWE region, we request that all NEMOs active in the region publish common aggregated (and anonymous) bid/offer curves based on orders of all participants on the CWE day-ahead market.

CWE day-ahead coupling is one market, where the orders of market participants are matched irrespective of which NEMO they have been entered into. **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.** Market participants should not be the ones trying to aggregate bid/offer curves from the different NEMOs.

As prior to day-ahead clearing, all orders (coming from EPEX Spot, Nord Pool Spot and EXXA) are aggregated and transferred to the Euphemia Algorithm, **we expect that a technical solution can be found easily by MRC members to jointly publish those aggregated curves post day-ahead results.**

We hereby request the NEMO Committee to rapidly implement a solution for the common publication of aggregated (and anonymous) bid/offer curves of all market participants active in CWE day-ahead coupling. This solution should be replicable throughout other regions wherever MNAs come into force.

We remain at your disposal to discuss this matter further.

Best regards,



Jan van Aken,
Secretary General