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Consultation on maximum and minimum clearing prices for single day-ahead and intra-day-coupling

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Dear Sir or Madam,

we welcome the opportunity to express our point of view regarding the introduction of maximum and minimum prices in the SDAC and SIDC and would like to add the following remarks.

In general we would like to state that we consider unbiased market prices essential to reflect scarcity and excess of energy in the day-Ahead and intraday-markets and thereby provide the right incentives to market participants. Price limits in both directions distort price signals and especially scarcity prices are of special importance for future investments in the power sector. In line with the EU clean energy package we argue against any price limits or if so none lower than the Value of lost load (VOLL). Option 3 (9999 €/MWh) of Question 2 in our opinion does not necessarily reflect the VOLL and could still be too low. However in comparison to option 1 and 2 it is still the better option.

In this context (Question 1) we support the idea of an faster automatic adjustment of the prices triggered by a single event (60 percent of the Maximum Clearing Price Limit in at least one market time unit) and not as proposed by the NEMOs triggered by multiple events. A single trigger for automatic adjustment can prevent major distortions and increase the efficiency of the market by converging faster to the VOLL.

Regarding Question 3 we do not have any concerns about the implementation date proposed.

Best regards

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