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**DECISION OF THE ENERGY SECTOR OF RAEWW UNDER
NO. E-207/2023**

**Administrative fees and Charges for the Day-Ahead and the Intra-Day Market for the
years 2024-2026**

Energy Sector of the Regulatory Authority for Energy, Waste and Water

At its regular meeting of its Composition, at the headquarters of the Authority, on the **23th of November 2023**, and

Taking into account :

1. Chapter C' "*Stipulations coming under the competency of the Ministry for the Environment and Energy*" L. 4425/2016 "*Urgent regulations of the Ministries of Finance, Environment and Energy, Infrastructure, Transport and Networks and the Ministry of Labor, Social Security and Social Solidarity, on the application of the agreement on fiscal targets and structural reforms and other stipulations*" (A' 185), as applying, and especially articles 8, 10 and 18 of this law.
2. L. 4001/2011 "*On the operation of Energy Markets for Electricity and Natural Gas, for Research, Production and Hydrocarbon transfer networks and other regulations*» (A' 179).
3. L. 5037/2023 "*Renaming the Regulatory Authority for Energy to Regulatory Authority for Energy, Waste and Water and expanding its scope with responsibilities over water services*

and urban waste management, strengthening the water policy - Modernization of the legislation on the use and production of electricity from renewable sources through the integration of EU Directives 2018/2001 and 2019/944 - Special provisions for renewable energies and environmental protection” (A’ 78), and particularly in articles 1-23.

4. Article 121 of L. 5043/2023 *"Regulations regarding Local Government Organizations of the first and second degree - Provisions for the welfare of companion animals - Provisions for the human resources of the public sector - Other regulations of the Ministry of the Interior and other urgent provisions" (A' 91) .*
5. The Regulation (EU) 2015/1222 of the Committee dated as of July 24th, 2015 establishing a guideline on capacity allocation and congestion management (EEL 197 dated as of 25.07.2015, p. 24 suc.).
6. The Day-Ahead & Intra-Day Market Rulebook (RAE Decision No. 1116/2018, B' 5914), as applicable after its amendment by the RAE Decisions PAE No. 820/2020 (B' 1941, encoded version), 1228/2020 (B' 4124, encoded version), 610/2021 (B' 3857, encoded version), 775/2021 (B' 4982), 987/2021 (B' 6485), 693/2022 (B' 4960, encoded version), 909/2022 (B' 6931) and 163/2023 (B' 1313) and in particular the provisions of section 3.12.
7. The No. 1124/5.12.2019 Decision of RAE "On defining the public limited company "HELLENIC ENERGY EXCHANGE S.A." and distinctive title "HEnEx S.A." as "Nominated Electricity Market Operator/NEMO", in accordance with paragraph 2 of the article 8 of L. 4425/2016 (GG A' 185/30.09.2016), as applying».
8. The No. 36/2020 Decision of RAE with the subject "Approval, in accordance with par. 1 of article 9 of L. 4425/2016 and par. 1 of article 117C of L. 4001/2011 as applying, of the operation of the public limited company operating under the name "HELLENIC ENERGY EXCHANGE S.A." and distinctive title "HEnEx S.A." as Energy Exchange for the administration and operation of the Day-Ahead and Intra-Day Market" (B'742).
9. The No. 949/2020 Decision of RAE with subject "Methodology for Calculating Fees and Charges for the operation of the Day-Ahead Market and the Intra-Day Market” (B’ 2541) as modified by the No. 987/2021 RAE Decision (B' 6485).
10. The No. 950/2020 RAE Decision with the subject “Administrative fees and Charges for the Day-Ahead and the Intra-Day Market for the years 2020-2022” (B' 2542) as modified by the No. 987/2021 RAE Decision (B' 6485).

11. The No. 1007/2020 Decision of RAE with subject “Approval of the Executive Decision pertaining to the “Charges and Administrative Fees EnExClear for clearing the transactions of the Day-Ahead Market and the Intra-Day Market for the years 2020-2022”” (B’ 3267).
12. The under Reg. No. RAEWW I-355899/08.08.2023 (HEnEx: 1316/03.08.2023, EnExClear: 596/03.08.2023) letter of the Energy Exchange Group on the subject of *“Submission of Recommendations, according to the provisions of section 3.12 of the Regulation on the Operation of the Day-ahead and Intraday Market of the Hellenic Energy Exchange S.A. (HEnEx S.A.)”*.
13. The RAEWW Public Consultation on the aforementioned proposal of the Energy Exchange Group (rel. 12) which took place from 18.08.2023 to 18.09.2023¹ as well as the results thereof as published on the website of the Authority², i.e. the letters of the companies MYTILINEOS S.A. (reg. No. RAEWW I-357843), Public Power Corporation S.A. (reg. No. RAEWW I-357914) and Renewable Energy Sources Operator & Guarantees of Origin (DAPEEP SA) (reg. No. RAEWW I-357978, confidential).
14. The under Reg. No. O -105165/26.09.2023 electronic mail in which the results of the aforementioned public consultation were transmitted as well as the Authority's request for the relevant views of the Energy Exchange Group and additional information.
15. The under Reg. No. RAEWW I-359102/04.10.2023 (HEnEx:1598/04.10.2023, EnExClear: 743/04.10.2023) letter of the Energy Exchange Group on the subject *“Comments of the Energy Exchange Group on the results of the Public Consultation regarding the approval of the modification of the methodology for calculating fees and charges for the operation of the Day-ahead Market and the Intraday Market as well as of the relevant fees and charges paid by the Participants and their Clearing Members”*.
16. The under Reg. No. RAEWW I -360822/27.10.2023 electronic document of the Energy Exchange Group with updated data.
17. The under Reg. No. 0-106162/03.11.2023 letter of RAEWW on the subject *“Proposal of the Energy Exchange Group to amend the Fees and Charges Calculation Methodology for the operation of the Day-Ahead Market and the Intraday Market (RAE Decision 949/2020), fees*

¹ <https://www.rae.gr/genika-nea/70237/>

² <https://www.rae.gr/diavoulefseis/72165/>

and charges for the operation of the Day-ahead Market and the Intraday Market, and fees and charges of EnExClear as a Clearing Agent for the Clearing of Day-ahead Market and Intraday Market Transactions'.

18. The under Reg. No. RAEWW I-361776/10.11.2023 (HEnEx: 1822/10.11.2023, EnExClear: 839/10.11.2023) letter of the Energy Exchange Group on the subject "*Response of the companies of the Energy Exchange Group on the with A.P. O-106162 Letter of the RAEWW, regarding the Methodology for calculating fees and charges for the operation of the Day-Ahead Market and the Intraday Market as well as the relevant fees and charges paid by the Participants and their Clearing Members*".
19. The No. E-206/2023 Decision of the Energy Sector of RAEWW with subject "*Modification of the Methodology for Calculating Fees and Charges for the operation of the Day-Ahead Market and the Intra-Day Market*".
20. The fact that the provisions hereof do not entail any charge on the State Budget.

Has come to the following conclusions:

Whereas, according to point (c), of par. 1 of article 6 of L. 4425/2016 regarding the Duties of RAE:

"1. In addition to the duties laid down in the current legislation, and especially in the provisions of L. 4001/2011, RAE :[...]

*c) Exercises the responsibilities of the regulatory authorities provided for in Regulation (EU) 2015/1222 and provide in particular for the definition of the NEMO, monitoring its compliance with the definition criteria, **approving the administrative fees of the NEMO in case of monopoly**, the approval of the cooperation plan for the NEMOs for the joint establishment and execution of the operation of Market Coupling Operator; the approval of the other terms and conditions or methodologies and the execution of all duties, functions and responsibilities, according to the details provided in this Regulation.[...]»*

Whereas, in accordance with article 8 of L. 4425/2016 regarding the definition and the duties of the NEMO:

*“[.]2. Without prejudice to par. 7 hereof and par. 4 of article 117e of L. 4001/2011, the NEMO is assigned by decision of RAE, according to the criteria provided for in the Regulation (EU) No. 2015/1222. **RAE is responsible for monitoring the compliance with the definition criteria, the approval of the administrative fees of the NEMO or the methodology for calculating these administrative fees, the recovery of the NEMO, as well as any other duty assigned to the national Regulatory Authorities, in virtue of the aforementioned Regulation [..]** 5. **The NEMO receives from the Participants administrative fees for the administration and operation of the Day-Ahead and the Intra-Day Market, with the approval of RAE** subject to the provisions of the Regulation (EU) 2015/1222. [..]”*

Whereas, article 18 of the same law provides for, among other things, the following:

“[.]2. Energy Exchange Rulebook [..] defines the terms and conditions for the operation of the Day-Ahead and Intra-Day Market [..]. The Regulations include transparent and non-discriminatory rules, which are based on objective criteria regarding the access of the Participants to the Electricity Markets. The Participants and any other person to whom the Regulations relate must comply with their obligations arising from them. The Rulebook determines the consequences that occur in case of breach of its rules. The following are specifically specified: [..]

b) The obligations and rights of the Participants, [.]

g) The rules and procedures for trading [.]

*j) **Approval procedures from RAE and recovery from the Energy Exchange and the HTSO of the administrative fees or other charges for the operation cost of Energy Markets. [.]***

jf) Any other regulation necessary for the smooth, transparent and efficient operation of each Energy Market.[.]

*4. **Methodologies, parameters and other special approvals provided by the Market Codes, are decided by RAE, following a suggestion of the Market Operators and are published in the Government Gazette.[..]”***

Whereas, subject to section 3.12 of the Day-Ahead and Intra-Day Market Rulebook (rel. 6, hereinafter referred to as the “Rulebook”), the following are provided:

«3.12 Fees and Charges

1. *The operating costs of the Day-Ahead and Intra-Day Markets are recovered through fees and charges paid by the Participants in HEnEx.*
2. *HEnEx maintains separate accounts for the operation of the Day-Ahead Market and the operation of the Intra-Day Market.*
3. *The above applicable fees and charges are determined by RAE Decision, **based on a methodology for calculating fees and charges, upon HEnEx’s recommendation.** The relevant administrative fees and charges apply after the lapse of a time period specified by the aforementioned RAE Decision, which cannot be less than thirty (30) days from the date on which the relevant decision was published.*
4. *The respective fees and charges of the Day-Ahead Market and the Intraday Market as defined by RAE Decision, are applied until the entry into force of a new RAE Decision.*
5. *HEnEx shall submit to RAE for approval a proposal for the above methodology no later than three (3) months before the date of entry into force of RAE decision on the determination of fees and charges.*
6. *The applicable fees and charges of HEnEx are published by HEnEx on its website and include, but are not limited to:*

3.12.1 Administrative Fee

1. *For the appraisal of a “Participant Membership Application”, the applicant shall pay an administrative fee for HEnEx as determined by RAE Decision upon HEnEx’s recommendation.*
2. *The administrative fee shall be paid upon submitting the “Participant Membership Application”.*

3.12.2 Administrative Fee for the Initial Registration of Participant

1. *Each Participant shall pay for HEnEx an Administrative Fee for Initial Registration determined by RAE Decision upon HEnEx’s recommendation. The Administrative Fee for*

Initial Registration is paid separately for the participation in the Day-Ahead Market, for the participation in the Intra-Day Auctions of the Intra-Day Market and for the participation in the Continuous Intra-Day Trading.

- 2. The Participant's Administrative Fee for the Initial Registration is a precondition for Participant's activation in the Markets.*

3.12.3 Annual Subscription

- 1. The Annual Subscription is paid by the Participants separately for the participation in the Day-Ahead Market, in the Intra-Day Auctions of the Intra-Day Market and in the Continuous Intra-Day Trading upon HEnEx's recommendation.*
- 2. Participant's Annual Subscription fee is a precondition for Participant's activation in the Markets. Participants are required to pay the Annual Subscription fee for each subsequent year of the year of their activation ten (10) Working Days after the beginning of the reference year".*
- 3. No Annual Subscription amounts will be reimbursed by HEnEx to Participants, if their participation expires during the year.*

3.12.4 Trading Fee

- 1. The Trading Fee, as specified by a RAE Decision, following a HEnEx proposal, burdens the Participants on the executed trading volume in Megawatts (MWh).*
- 2. The Trading Fee is collected on a daily basis through the Clearing House, according to its timings and its procedures, as these are described in the Clearing Regulation and the issued Technical and/or Executive Decisions that are based on the same.*

3.12.5 Commission on Behalf Of Trading (OBOT)

- 1. The use by a Participant of the Trading on Behalf service according to section 2.3.2 and related trading support procedures (OBOT) is charged with a special commission defined by RAE Decision, following a HEnEx proposal.*
- 2. The commission is calculated per Participant's Order forwarded to be executed by the competent departments of HEnEx or, in the case of a registered Order thereof, modified or cancelled by these departments at the request of the Participant. Since the service*

concerns the registration of quantities for Physical Settlement, the charge is made per registration.

- 3. No commission is paid for Orders submitted with the On Behalf of Trading service in accordance with the provisions of cases (k) and (ka) of subsection 4.1.4 and cases (ie) and (if) of subsection 5.2.3.*

3.12.6 Commission to use a common access point

- 1. The use of a common access point in HEnEx facilities by a Participant in subsection 2.3.3 is charged with a special commission defined by RAE Decision, following a HEnEx proposal.*
- 2. The commission is calculated per hour of use of the common access point. [...]"*

Whereas, by the No. 1124/2019 decision (rel. 7), RAE assigned the public limited company operating under the name "HELLENIC ENERGY EXCHANGE S.A." and distinctive title "HEnEx S.A." as Nominated Electricity Market Operator (NEMO) for five (5) years, in application of the provisions of par. 2 of article 8 of L. 4425/2016.

Whereas, by the No. 36/2020 RAE decision (rel. 8) the operation of the public limited company operating under the name "HELLENIC ENERGY EXCHANGE S.A." and distinctive title "HEnEx S.A." as Energy Exchange for the administration and operation of the Day-Ahead and Intra-Day Market, has been approved in accordance with par. 1 of article 9 of L. 4425/2016 and par. 1 of article 117C of L. 4001/2011, as in force.

Whereas, by the No. 949/2020 and 950/2020 Decisions of RAE the Methodology for Calculating Fees and Charges for the operation of the Day-Ahead Market and the Intra-Day Market was specified, (hereinafter the "Methodology") as well as the Administrative fees and Charges for the Day-Ahead and the Intra-Day Market for the years 2020-2022 respectively. These decisions were modified by RAE decision 987/2021 according to which the date of payment, and consequently of the calculation of the Annual Subscription, was postponed so that for the categorization of the Participants, the most recent data on the volume of transactions is taken into account.

Whereas, based on L. 5037/2023, the Regulatory Authority for Energy is renamed the Regulatory Authority for Energy, Waste and Water (RAEWW) and where reference is made to the name "Regulatory Authority for Energy" or "RAE", it means the RAEWW.

Whereas, by its letter dated as of 03.08.2023 (rel. 12), the Energy Exchange Group proposed the amendment of the Calculation and Charges Methodology for the Energy Exchange (HEnEx) as well as the fees and charges for the operation of the Day-Ahead Market and the Intraday Market for the years 2024-2026. According to the proposal on fees and charges, HEnEx proposed an increase in four fees as follows:

Description	Implementation	Applying Fees and Charges	Proposal of HEnEx on Fees and Charges	Change rate (%)
Application examination fee	lump sum€	200	200	0%
Initial Registration Fee - cat. A	lump sum€	2000	2000	0%
Initial Registration Fee - cat. B	lump sum€	6000	6000	0%
Annual subscription DAM cat. A	Year €	1000	2500	150%
Annual subscription DAM cat. B	Year €	10000	12000	20%
Annual subscription IDM	Year €	0.000	0.000	0%
Transaction fee DAM	€/MWh	0.046	0.056	22%
Transaction fee IDM	€/MWh	0.081	0.092	14%
Trading on Behalf 1-10	per order €	10	10	0%
Trading on Behalf 11-50	per order €	20	20	0%
Trading on Behalf 51-	per order €	30	30	0%

Common access point	per usage hour	50	50	0%
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The necessity to increase the fees and charges, according to the proposal, results from the application of the Methodology: a) from the comparative evaluation of the fees of HEnEx with the fees of European energy exchanges, which comparative evaluation shows that the existing fees of HEnEx are significantly lower compared to the counterparts of the energy exchanges of the analyzed sample, and b) from the financial analysis, based on the recent HEnEx Business Plan, according to which significant increases in the company's operating expenses are expected in order to respond to the increased complexity and increased demands of the Markets it manages. In addition, it is pointed out that the proposed fees and charges lead to an increased estimated profitability for the 2024-2026 Regulatory Period under consideration, i.e. close to 25% (Earnings Before Interest, Taxes and Depreciation - EBITDA) compared to approximately 19%, as it had assessed for the first Regulatory Period in accordance with RAE decision 950/2020.

Whereas, RAEWW set the proposal of HEnEx to a public consultation, in the context of which comments were submitted by three participants (rel. 13). HEnEx, with its document dated as of 04.10.2023 (rel. 15), sent its opinions on the results of the public consultation following a relevant request from the Authority (rel. 14). With the same document (ref. 14), the Authority requested additional information regarding the reasonableness of the financial quantities included in the financial analysis in application of the Methodology.

Whereas, RAEWW after having considered the proposal of HEnEx (rel. 12), the views of the participants in the public consultation about it (rel. 13), HEnEx's views on them and the additional data submitted by HEnEx (rel. 15), as well as the updated data submitted in the context of the cooperation between the services of HEnEx and RAEWW (rel. 16), sent a letter to the Energy Exchange Group (rel. 17) with which it recognized the need for a significant increase in the operational costs of HEnEx (and EnExClear) for the new regulatory period 2024-2026 compared to the first regulatory period, due to the increased complexity of short-term markets both at the level of planning and level of implementation and operation, but also the need to ensure the high level of services and to secure the required resources for the continuous evolution and development of the electricity markets. On the other hand, the Authority considered that the necessity of

increasing profitability is not sufficiently documented in the Group's proposal, especially taking into account the results of the comparative evaluation where in general the exchanges under a monopoly regime (in particular HUPX, OMIE and OTE) demonstrate significantly lower profitability indicators, in relation to those nominated by the Group (with an average close to 18%, range 0.2-46% in the years 2020-2021). Therefore, additional evidence was requested to document the need to increase profitability and its impact on the companies' operations, or alternatively resubmit the proposal with revised fees and charges so as to lead to returns at the levels estimated for the fees approved with the decision RAE 950/2020.

Whereas, in response to the letter from ERAEF, HEnEx submitted an updated proposal for the amendment of the Methodology (rel. 18). With regard to the requested increase in profitability, the Energy Exchange Group did not modify its proposal, citing the following:

- a. The increased complexity of the markets has significantly increased the operational risk as well as the potentially greater exposure of the companies (HEnEx and EnExClear) to legal risks compared to the first Regulatory Period. The risk also increases due to the increased value of the transactions carried out in the markets that HEnEx is called upon to manage.
- b. The energy crisis triggered a number of changes in the EU and national regulatory framework for the operation of the markets - already established but also in progress - increasing the regulatory risk of companies.
- c. The increased uncertainty regarding the evolution of domestic electricity consumption leads to an increase in business risk since domestic electricity consumption is a decisive parameter for the volume of Market transactions and therefore the revenues of the Group's companies.
- d. Energy Exchange Group's fees are significantly lower than those of the energy exchanges and clearing houses in the fee sample. The profitability resulting from the proposed charges is considered reasonable compared to that of the profitability sample examined, which includes all exchanges for which financial statements were publicly available. The reason why all exchanges for which information is available are included in the profitability sample, regardless of whether their profitability appears to be quite high or prohibitively low, is the fact that heterogeneity in their characteristics (ownership status which may be

public or private shareholders or a combination of the two, market situation which may be monopoly or competition, functioning Markets), prevents the analysis from focusing on a subset of the profitability sample.

Whereas, the Energy Sector of RAEWW, with the no. E-206/2023 decision approved the amendment of the Methodology for Calculation of Fees and Charges for the operation of the Day-ahead Market and the Intraday Market.

Whereas, after examining the final proposal of HEnEx (rel. 18), partially accepts the Group's argumentation and deems reasonable the increase in profitability compared to the levels estimated for the first Regulatory Period, limiting it to approximately 22% (EBITDA) - i.e. approximately in the middle as proposed by HEnEx and as approved in the previous RAE decision. Therefore, it considers it reasonable to set the Transaction Fees for the Day-ahead Market and the Intraday Market at the levels of €0.054 and €0.090/ MWh, respectively. For the rest, namely with regard to the increase in the fees for the annual subscription for the Next Day Market, the proposal of HEnEx is acceptable, given that it is considered reasonable to adjust it to levels closer to the fees of other energy exchanges as it emerged from the comparative evaluation.

Decides:

Within the frame of its duties, subject to articles 6, par. 1 ed. (c), 8 par. 2 and 5, and 18 par. 4 of L. 4425/2016 (GG A' 185), and according to the provisions of section 3.12 of the Regulation on the Operation of the Day-ahead Market and the Intraday Market, and in accordance with the Methodology for the Calculation of Fees and Charges for the operation of the Day-ahead Market and the Intraday Market, as it was approved by the Decision of the Energy Sector of RAEWW E-206/2023, the approval of the Fees and Charges for the operation of the Day-ahead Market and the Intraday Market for the years 2024-2026 as follows:

Day-Ahead and Intra-Day Market Administrative Fees and Charges

Article 1.

Charge on application processing-Fee

For the examination of the "Participant Membership Application" submitted by a candidate Participant, the candidate pays, upon the submission of the application, the full amount of two hundred euros in cash (€ 200.00) plus VAT.

Article 2.

Categories of Participants in the context of administrative fees and charges

1. According to the RAEWW approved "Methodology for Calculating Fees and Charges for the operation of the Day-Ahead Market and the Intra-Day Market", two categories are defined, category A and category B, based on the total trading volume in the previous calendar year. The total trading volume includes all quantities of energy sold or purchased in the Day-Ahead Market and the Intra-Day Market. The limits of classes are specified as such:
 - Class A: Up to 0.1 TWh annually
 - Class B: Above 0.1 TWh annually
2. New Participants for whom there is no data for the previous calendar year are considered in Class A.

Article 3.

Administrative Fee for the Initial Registration of Participant

1. Each Participant pays as Initial Membership Fee, the following amounts:

Market	Administrative Fee for the Initial Registration of Participant
Day-Ahead Market	Class A: 2,000.00€ plus VAT Class B: 6,000.00€ plus VAT

Intra-Day Market (IDM)	0 €.
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2. Each Participant pays the Initial Membership Fee, fully in cash, within five (5) business days of the date on which the "Participant Membership Certificate" is issued.
3. The payment of the Initial Membership Fee is a precondition for Participant's activation in the respective Market.
4. New Participants who, in the absence of trading data in the Greek Day-ahead and Intraday market, were included in Class A and paid the reduced Initial Membership Fee for a Participant of Class A, provided in the following full calendar year they will come under another Class, they pay the corresponding difference of the Initial Membership Fee for a Participant. No part or difference of the Initial Membership Fee is reimbursed.
- 5.

Article 4.

Annual Subscription

1. Each Participant pays as Annual Subscription, the following amounts:

Market	Annual Subscription
Day-Ahead Market	Class A: 2,500.00€ plus VAT Class B: 12,000.00€ plus VAT
Intra-Day Market (IDM)	0 €.

2. Participant's Annual Subscription fee is a precondition for Participant's activation in the respective Market. The corresponding amount of the Annual Subscription is calculated proportionally from the date of issue of the "Participant Registration Certificate".
3. Each Participant pays the Annual Membership, fully in cash, within five (5) business days of the date on which the "Participant Membership Certificate" is issued.
4. *For each subsequent year of the year of activation of the Participant in the respective Market, the Annual Subscription is paid in its entirety, fully in cash, ten (10) business days after to the start of every report year.*
5. No Annual Subscription amounts are reimbursed in case of writing off, suspension or resignation of a Participant, or non participation of the same for any reason in the Markets, for the duration of the year.

6.

Article 5.

Trading Fee

1. Each Participant pays, as Trading Fee over the executed trading volume in megawatt hours (MWh), the following amounts:

Market	Trading Fee
Day-Ahead Market	0.054 Euro/ MWh plus VAT
Intra-Day Market (IDM)	0.090 Euro/ MWh plus VAT

2. The Trading Fee is collected on a daily basis through the Clearing House, according to its timings and its procedures, as these are described in the Clearing Regulation of the Day-Ahead and Intra-Day Market and in the Decisions that might have been issued under it.
- 3.

Article 6.

Commission for the Routing Orders to Third Parties service (OBOT)

1. Use by a Participant of the Routing Orders service to Third Parties procedure for a reason not due to a technical malfunction of HEnEx, as for example due to a malfunction in its internal network, is charged with a special commission.
2. The commission is calculated per Participant's Buy or Sell Order and per Delivery Day D, forwarded for execution by HEnEx's competent authorities or, provided it is an order registered in the Order Book, that is modified or cancelled by such services at the request of the Participant.
3. The amount of commission per Order is scaled according to the number of Orders concerned, as follows:

Number of Orders	Charge per Order
From 1 up to 10 orders	10 €.
From 11 up to 50 orders	20 €.
From 51 orders and above	30 €.

4. The total amount of the commission for the Routing Orders service to Third Parties may not

exceed the amount of 2,000 € per Delivery Day D.

Article 7.

Commission on using the Shared Access Point

The use of a Shared Access Point (SAP) at the premises of HEnEx by the Participant, for a reason not due to a technical malfunction of HEnEx, as for example due to a malfunction in the Participant's internal network, is charged with a special commission of fifty (50€) Euro per hour of use, plus VAT.

Article 8.

Validity of Administrative Fees and Charges

1. The administrative fees and charges apply for the years 2024, 2025 and 2026.
2. The administrative fees and charges hereof can be modified in accordance with the provisions of par.3 Article 2 of the Methodology for Calculating Fees and Charges for the operation of the Day-Ahead Market and the Intra-Day Market, as applying.
3. HEnEx publishes the applying administrative fees and charges on its webpage.»

This act comes into force thirty (30) days from its publication in the Government Gazette.

This Decision is notified to the company "Hellenic Energy Exchange S.A.", posted on the official website of RAE and published in the Government Gazette (GG).

Athens, 23/11/2023

**The Vice-President of the sector,
of Energy for RAEWW
Dimitrios Fournalis**

28/11/2023 10:04

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