

DECISION 4¹

"Registration of Energy Financial Instruments and other energy wholesale products for Physical Settlement and procedure for submitting Physical Delivery and Offtake Nominations"

HELLENIC ENERGY EXCHANGE S.A.

Having taken into consideration the provisions of the section 6 of the Day-Ahead and Intra-Day Markets Trading Rulebook (hereinafter referred to as the "Rulebook")² of the Hellenic Energy Exchange S.A. (HEnEx) as in force:

DECIDES AS FOLLOWS

Article 1. Objective - Scope – Definitions

1. This Decision defines the technical registration details of:
 - a) Energy Financial Instruments with Physical Delivery obligation (bilateral OTC contracts) and other energy wholesale products with Physical Delivery obligation, which were traded outside the Financial Energy Market as well as
 - b) the Physical Delivery and Offtake Nominations.

For the scope of this Decision, the above (a) is also referred to as "Instruments with Physical Delivery (IPD)".

2. The terms of this Decision have the same meaning as those given in L. 4425/2016, L. 4001/2011 or other relevant national or union legislation, the Day-Ahead and Intra-Day Markets Trading Rulebook (hereinafter the "Rulebook") of HEnEx, the Clearing Rulebook for Transactions on Day-Ahead & Intraday Markets (hereinafter referred to as the "Clearing Rulebook") including any other decisions adopted for their implementation.

¹ Unofficial translation from the Greek language (Ref. HEnEx: 369/07.03.2023), as of 07/03/2023. In case of any discrepancy between the Greek and the English version, the Greek version prevails.

² Regulatory Authority of Energy (RAE), Decision 1116/13.11.2018 (GG 5914/31.12.2018), "Approval of the Day-Ahead and Intra-Day Market Trading Rulebook, according to the articles 9, 10 and 18 of L.4425/2016 (GG A' 185), as applying".

Article 2. Responsible parties for the registration of Energy Financial Instruments registration traded outside the Financial Energy Market and other energy wholesale products for Physical Settlement.

1. In case two Participants of the Day-Ahead Market have concluded a transaction on an IPD, they are required to register its features in the Energy Trading Spot System (ETSS).
2. The deadline for submission and acceptance/rejection of the IPDs registration is set out on a Technical Decision of HEnEx.

Article 3. Procedure and Registration Information of Bilateral Energy Financial Instruments for Physical Settlement

1. The obliged Participants shall enter at least the following information in the ETSS:
 - a) the identification number of the IPD;
 - b) the code of the counter Participant, as appearing in ETSS;
 - c) the Starting Delivery Day of the IPD;
 - d) the Expiring Delivery Day of the IPD;
 - e) selection of the weekdays within the time period defined by (c) and (d);
 - f) the Market Time Units relevant to the Physical Settlement;
 - g) the quantity for Physical Delivery and Offtake,
 - h) an informational message to the counter Participant as well as recording notes of the same.

Regarding the IPD which are registered to ETSS pursuant to the provisions of Articles 12A of L.4425/2016, as applying, and the quantities/trades of the Physical Delivery Nominations, which are exempt from the implementation of the Temporary Producer Revenue Return Mechanism in the Day-Ahead Market, the counter Participants (which either submit initially, either accept the above IPD submissions) is mandatory to fill out:

- in the ContractID of the IPD a discretionary code of the contract between the Producer/RES Aggregator and the Consumer and/or the Supplier, to which it should at least be included the date of the contract agreement using the format "YYYYMMDD" (both parties of the IPD should use the same code),
- the following declaration in the field "Comment for Peer":
"The contract with code "ContractID" falls under par. 3A article 12A L. 4425/2016 and the income pursuant to it does not exceed the upper limit of par. 1 article 6 Regulation (EU) 2022/1854".

Users of the ETSS can insert private notes in the field "My Private Note". The content of these notes is accessible exclusively from the users of the Participant and it is not published to the counter Participant.

2. After the successful registration of the IPD, all the information referred to in paragraph 1 of this Article will appear in ETSS of the counter Participant and the status of the IPD for Physical Settlement is classified as "PENDING".
3. The counter Participant has the possibility to accept or reject the relevant registration displayed in ETSS until the Registration Gate Closure Time of Energy Financial Instruments for Physical Settlement for the first Delivery Day of Physical Delivery/Offtake.
4. In case of acceptance, the counter Participant is notified in ETSS by a relevant message and the status of the IPD is classified as "VERIFIED".
5. In case of rejection of the relevant registration, the counter Participant is notified in ETSS by a relevant message and the status of the IPD is classified as "REJECTED".
6. After the expiry of the Registration Gate Closure Time of the IPD, for the first Day of Physical Delivery/Offtake, the IPD is classified as "ACTIVE".
7. After the expiry of the Registration Gate Closure Time of the IPD, for the last Day of Physical Delivery/Offtake, the IPD is classified as "EXPIRED".
8. After the defining the IPD as "CONFIRMED" no modification of the IPD entry is allowed. In the case where a Participant requires to modify the information of the IDP entry they should promptly follow the cancellation procedure of the IDP entry and proceed with submitting and confirming new registration(s).
9. While the IPD is in force, either of the counter parties has the option to terminate its validity through ETSS. In this case, ETSS sends a corresponding message to the counter party and the following do not apply anymore: (a) the consideration of the quantities of the relevant IDP in the calculation of the Total Delivery/Offtake Position of the Participant, (b) the obligation for Physical Delivery and Offtake Nomination is no longer required, while the status of the IPD is classified as "CANCELLED".
10. In case there is a failure to accept or reject an IPD until the Registration Gate Closure, the status of the IPD is classified as "FAILED".

Article 4. Procedure for submitting Physical Delivery Nominations and Physical Offtake Nominations

1. After the expiry of the Financial Energy Instruments Registration Gate Closure Time, ETSS calculates for each Participant and for each Market Time Unit of Delivery Day D the following:
 - a. Total Delivery Position as: $TDP = DP_X + DP_{BOTC}$.
 - b. Total Offtake Position as: $TOP = OP_X + OP_{BOTC}$.

After the above calculations, Physical Delivery Nominations and the Physical Offtake Nominations can be submitted to proceed with the Physical Settlement of the *TDP* and *TOP* quantities in the Day-Ahead Market.

2. For the creation and entry/submission of the Physical Delivery Nomination or Physical Offtake Nomination in the ETSS, the Participants should adhere to the following procedure:

- a. choose the Nomination entry interface (entry, editing and submitting of a Nomination or multiple Nominations by using the user interface or the ETSS API),
- b. choose/indicate the Day for Physical Delivery/Offtake,
- c. choose/indicate the Entity on which the Nomination applies to,
- d. choose/indicate the Clearing Account for the clearing of the resulting Order/Trade,
- e. choose/indicate the Market Time Unit for entering the Nomination for the Physical Delivery/Offtake,
- f. enter the Nominated Physical Delivery/Offtake quantity. Submitting the quantity of the Physical Delivery/Offtake Nominations by using the user interface provides the option to define the limits/obligations of the Participant as well as the availability of the chosen Entity, which apply as a technical submission check. During the entry of multiple Nominations, ETSS provides the option of executing Nomination pre-checks before their final submission. The pre-check does not constitute the submission of Physical Delivery/Offtake Nomination.
- g. submit optionally a note about the nominated quantity in the field "Nomination/Order Note".

More specifically (regarding the Physical Delivery/Offtake Nominations which are submitted for the Physical Settlement of IPD, which, in extent, are submitted in the ETSS pursuant of the provisions of Article 12A of L.4425/2016, as applying, whose quantities/trades are exempt from the Temporary Producer Revenue Return Mechanism implementation in the Day-Ahead Market, the users of ETSS of both counter Participants must submit the following note in the field "Nomination/Order Note":

#1#ContractID,

where the "ContractID" should be replaced with the content submitted in the "ContractID" field of the relevant IPD registration in accordance with paragraph 1 of Article 3 of this document.

The requirement for submitting the #1#ContractID identifier applies for the relevant to the IDP Physical Delivery and Offtake Nominations.

- h. submit the Physical Delivery/Offtake Nominations.

3. The Physical Deliver/Offtake Nominations are mandatory to be submitted before the deadline and up to the Deadline for Submission of Physical Delivery/Offtake Nominations.
4. In order to submit the Physical Delivery/Offtake Nominations, the ETSS users can use the option of Trading on Behalf which is provided by HEnEx. The Trading on Behalf procedure is outlined in the relevant HEnEx Technical Decision.

Article 5. Enforcement

This Decision shall apply from 07/03/2023.

This decision is to be posted immediately on HEnEx's website www.enexgroup.gr.