

DECISION OF RAE UNDER NO. 776/2021

Amendment of RAE Decision No. 1229/2020 regarding the Methodology on the application of acceptance rules for Sell and Buy Orders, with same price in the Day-Ahead and Intra-Day Markets subject to the provisions of sub-sections 4.1.3.2, 4.3.3, 5.4.3 and 5.10.3 Day-Ahead and Intra-Day Markets Trading Rulebook, and article 18 par. 4 of L. 4425/2016, as applying

The Regulatory Authority for Energy

During its ordinary meeting, at its headquarters, **on the 14th of October 2021**, and

Taking into account:

1. The stipulations of L. 4821/2021 «*Modernization of the Greek Land Registry, new digital services and strengthening of digital governance and other provisions*» (GG A' 134/31.07.2021) and in particular articles 107 and 108 of this law.
2. The stipulations of L. 4001/2011 «*For the operation of Electricity and Gas Energy Markets , for Research, Production and Hydrocarbon transmission networks and other regulations*» (GG A' 179/22.08.2011), as applying.
3. Chapter C' "*Stipulations coming under the competency of the Ministry for the Environment and Energy*" of 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*" (GG A' 185/30.09.2016), as applying and in particular articles 7, 8, 9, 10, 11, 15 and article 18 par. 4 of this law.
4. The Articles from 73 to 99 of L. 4512/2018 «*Arrangements for the implementation of the Structural Reforms of the Economic Adjustment Program and other provisions*» (GG A' 5/17.01.2018), as applying.
5. The Day-Ahead and Intra-Day Markets Trading Rulebook, (decision of RAE under the No. 1116/2018, GG B' 5914/2018), as applying following its modification by the No. 820/2020 (GG B' 1941/21.05.2020), 1228/2020 (GG B' 4124/24.09.2020), 610/2021 (ΦΕΚ Β' 3857/18.08.2021) and 775/2021 (henceforth «HENEx Rulebook») Decisions of RAE, and in particular the sub-sections 4.1.3.2, 4.3.3 and 5.10.
6. RAE Decision No. 869/2020 entitled "Methodology for the application of acceptance rules Buy/Sell Orders with same price in Day-Ahead Market and Intra-Day Market according to the provisions of subsections 4.1.3.2, 4.3.3, 5.4.3 and 5.10.3 of Day-Ahead and Intra-Day Markets

Trading Rulebook and the article 18 par. 4 of law 4425/2016, as in force "(Government Gazette B '2384 / 17.06.2020).

7. RAE Decision No. 1229/2020, entitled "Methodology for the application of rules of acceptance of Buy/Sell Orders with same price in Day-Ahead & Intra-Day Market, according to the provisions of subsections 4.1.3.2, 4.3.3 and 5.10.3 of Day-Ahead and Intra-Day Markets Trading Rulebook and article 18 par. 4 of L. 4425/2016, as applying" (GG B' 4334/05.10.2020).
8. RAE Decision No. 734/28.09.2021 entitled "Extension of the deadline of par. 2 of article 108C L. 4001/2011, as in force, in relation to the contribution of the interconnection of Phase A of the island of Crete" (GG B' 4633/06.10.2021).
9. RAE Decision 775/14.10.2021 entitled "Amendment of the Balancing Market Regulation (GG B' 4516 / 14.10.2020), of the Day-Ahead and Intra-Day Markets Trading Rulebook (GG B' 3857 / 18.08.2021), of the Electrical System Operation Code for Non-Interconnected Islands (GG B' 304/11. 2.2014) and the Code of RES & Guarantee of Origin Operator (GG B '4778 / 29.10.2020) as in force according to article 108C L. 4001/2011, as in force, in view of the first Delivery Day of the Phase A of the electricity interconnection of the island of Crete".
10. The document RAE I-309703/17.09.2021 of Hellenic Energy Exchange(NO./D./HEEx: 1351/16.09.2021, EnExClear: 772/16.09.2021) sent to RAE with notification to the Ministry of Environment and Energy, IPTO SA, HEDNO and DAPEEP S.A. with subject: "Proposal of amendment of provisions of the Day-Ahead and Intra-Day Markets Trading Rulebook regarding the possibility of submitting Buy and Sell orders by the HTS Operator for the Small Connected System of Crete".
11. The no. RAE I-310401 / 30.09.2021 document of the Energy Exchange Group with subject: "Suggestion for the sequence of PPT Orders curtailment".
12. The Public Consultation of RAE on the proposal of HEnEx S.A. on the modification of the methodology for the application of rules for the acceptance of Buy/Sell Orders with same price in Day-Ahead Market and Intra-Day Market in accordance with subsections 4.1.3.2, 4.3.3, 5.4.3 and 5.10.3 of the Day-Ahead and Intra-Day Markets Trading Rulebook, which took place from 01.10.2021 to 11.10.2021¹ in the context of which no comments were submitted.
13. The fact that in accordance with the provisions of par. 1 of article 32 of L. 4001/2011, the regulatory acts issued by RAE are published in the Government Gazette.
14. The fact that the provisions hereof do not entail any charge on the State Budget.

Has come to the following conclusions:

I. Legal framework - duties

Because, in accordance with the provisions of article 18 L. 4425/2016, as in force, it is provided, inter alia, that "[...]2. In Energy Exchange Rulebook [...] the terms and conditions for the operation of the Day-Ahead and Intra-Day Markets are defined[...]. The Rulebooks 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

¹ <https://www.rae.gr/2021/10/01/δημόσια-διαβούλευση-της-ραε-επί-της-ει-8/>

Regulations concern must comply with their obligations arising from them. [...] as well as that "[...] 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. [...]"

Because, in accordance with paragraphs 10, 11 and 12 of the sub-section 4.1.3.2 “Priority Price-Taking Orders” of the Day-Ahead and Intra-Day Markets Trading Rulebook (hereinafter referred to as the “Rulebook”, Decision of RAE 1116/2018, as modified by the decision of RAE 820/2020)

“10. In case that the Market Clearing Price in a Bidding Zone for a given Market Time Unit of Delivery Day D is equal to the Minimum Orders Price for the Day-Ahead Market and at the same time no Hourly Hybrid Sell Order has been accepted by the algorithm solution at a price equal to the Minimum Orders Price of the Day-Ahead Market and without Priority, then curtailment of Priority Price-Taking Sell Orders shall take place.

11. In case that the Market Clearing Price in a Bidding Zone for a given Market Time Unit of Delivery Day D is equal to the Maximum Orders Price for the Day-Ahead Market and at the same time no Hourly Hybrid Buy Order has been accepted by the algorithm solution at a price equal to the Maximum Orders Price of the Day-Ahead Market and without Priority, then curtailment of Priority Price-Taking Buy Orders shall take place.

12. The procedure for the curtailment of Buy/Sell Orders in the cases of paragraphs (10) and (11) is executed according to a methodology defined by RAE decision upon recommendation of HEnEx.”

Because, in paragraphs 9 and 10 of the sub-section 4.3.3 "Acceptance rules of Orders by the Day-Ahead Market Price Coupling Algorithm" of the Rulebook, the following are provided for:

“9. In the event that for a Market Time Unit more than one part of Hourly Hybrid Sell Orders has a value at the left end lower than or equal to the Market Clearing Price and at the right end higher than or equal to the Market Clearing Price, the acceptance of Orders is applied according to the methodology specified by a relevant RAE Decision, following a HEnEx proposal.

10. In the event that for a Market Time Unit more than one part of Hourly Hybrid Buy Orders has a value at the left end higher than or equal to the Market Clearing Price and at the right end lower than or equal to the Market Clearing Price, the acceptance of Orders is applied according to the methodology specified by a relevant RAE Decision, following a HEnEx proposal.”

Because, in accordance with paragraphs 3 and 4 of the sub-section 5.10.3 "Order acceptance rules in LIDAs and CRIDAs" of the Rulebook:

“3. In the event that for a Market Time Unit more than one part of Hourly Hybrid Sell Orders has a value at the left end lower than or equal to the Market Clearing Price and at the right end higher than or equal to the Market Clearing Price, the acceptance of Orders is applied according to the methodology specified by a relevant RAE Decision, following a HEnEx proposal.

4. In the event that for a Market Time Unit more than one part of Hourly Hybrid Buy Orders has a value at the left end higher than or equal to the Market Clearing Price and at the right end lower than or equal to the Market Clearing Price, the acceptance of Orders is applied according to the methodology specified by a relevant RAE Decision, following a HEnEx proposal.”

Because, HEnEx S.A. in its relevant document 10, submitted a proposal for amendment of the provisions of the Day-Ahead & Intra-Day Markets Trading Rulebook , which included, inter alia, a proposal to amend it, with the no. 1229/2020 Decision of RAE, approved " Methodology of application of Acceptance Rules for Buy / Sell Orders with Same Price in the Day-Ahead & Intra-Day Markets according to the provisions of subsections 4.1.3.2, 4.3.3, 5.4.3 and 5.10.3 of Day-Ahead and Intra-Day Markets Trading Rulebook and article 18 par. 4 of law 4425/2016, as in force ". RAE raised the relevant suggestion of HEnEx S.A. in public consultation (ref. 12), in which no comments were submitted.

Because, the operation of the electricity market of the island of Crete during the period from the start of operation of the Phase A until the Phase B of the interconnection of the island of Crete with the mainland system will be governed by the rules in force according to the provisions of article 107 of L. 4821/2021 as well as RAE decision no. 775/2021. According to these rules, HEnEx S.A. will submit Priority Price-Taking Buy and Sell Orders on behalf of the Load Representatives and the Conventional Producers of Crete respectively in the Energy Trading Spot System (ETSS) Day-Ahead Market and Intra-Day Auctions.

Because, in this regard, according to the suggestion of HEnEx S.A. (ref. 10 and 11), it is proposed to amend the rel. 7 Decision of RAE (Decision 1229/2020) regarding the Methodology of application of rules for accepting Buy / Sell Orders with same price in the Day-Ahead Market and the Intra-Day Market. In particular, it is proposed to add provisions for the curtailment / acceptance of orders related to the forecasted production / electricity load of Crete.

Because, RAE, after taking into account the above, i.e. the already approved rules for the acceptance of Buy / Sell Orders with same price in the Day-Ahead Market and the Intra-Day Market according to the provisions of subsections 4.1.3.2, 4.3.3 and 5.10.3 of the Day-Ahead and Intra-Day Markets Trading Rulebook, the fact that due to the operation of the Market related to Crete's electricity system, additions on the methodology of application of the above rules regarding the Buy and Sell orders submitted by HEnEx S.A., with the procedure of Trading on Behalf, on behalf of participants operating in Crete are required, as well as the results of the public consultation held between 01-11.10.2021 (rel. 12), considered reasonable the above suggestion of HEnEx S.A. and made the legislative improvements it deemed necessary.

Decides:

Within the frame of its duties, subject to article 18, par. 4 of L. 4425/2016, and the sub-sections 4.1.3.2, 4.3.3, 5.4.3 and 5.10.3 of the Day-Ahead and Intra-Day Markets Trading Rulebook as applying, the amendment of RAE decision no. 1229/2020, based on which the Methodology for the application of rules for the acceptance of Buy/Sell Orders with same price in the Day-Ahead Market and the Intra-Day Market was defined, by adding rules for the Buy/Sell orders submitted by HEnEx S.A., with the procedure of the Trading on Behalf, on behalf of participants operating in Crete in sections A and B of this operative part, as follows:

A. The curtailment of Priority Price-Taking Sell Orders in the Day-Ahead Market, it is applied per Market Time Unit, in the following sequence:

1. Sell Orders corresponding to the production of scheduled production of Generating Units in Commissioning or Testing Operation and RES Units in Commissioning or Testing Operation.
2. Sell Orders corresponding to trades that have been conducted within the Energy Derivatives Market, and have been nominated to ETSS through validated Physical Delivery Nomination, and to trades that have been concluded on Energy Financial Instruments bilaterally outside the Energy Derivatives Market and have been nominated to ETSS through validated Physical Delivery Nomination, with the exemption of Sell Orders corresponding to Imports using confirmed nominated Long-Term Physical Transmission Rights and Sell Orders corresponding to deviations of the forecasted Losses of the Transmission System.
3. Sell Orders corresponding to Imports using confirmed nominated Long-Term Physical Transmission Rights.
4. Sell Orders corresponding to the forecasted production of RES and CHP Units that are submitted by the Last Resort RES Aggregator.
5. Sell Orders corresponding to the forecasted production of RES Units that are submitted by DAPEEP.
6. Sell Orders corresponding to the scheduled production of CHP Units that are submitted by DAPEEP for reasons related to the safety of the facilities that are supplied with thermal energy.
7. Sell Orders submitted by HEnEx S.A., with the procedure of Trading on Behalf, on behalf of each Producer and correspond to the forecasted production of Crete, throughout the Operation of the hybrid model of the Small Connected System of Crete.
8. Sell Orders submitted by the HTS Operator and which correspond to the correction of deviations of the Transmission System Losses in relation to the Sell Orders that have been created as a result of the participation of the HTS Operator in the Energy Derivatives Market or bilaterally outside the Energy Derivatives Market.
9. Sell Orders corresponding to Mandatory Hydro Injections of each Hydro Unit for water supply, irrigation and ecological supply.

As for the Priority Price-Taking Sell Orders that are curtailed subject to the above provisions, within the same category, the selection is made according to the Timestamp at the moment they were entered into the ETSS, meaning within the same category, while the first to be curtailed are the ones that have been the last to be entered in the ETSS. As for the Priority Price-Taking Orders that correspond to Orders that are created as a result of their participation in the Energy Derivatives Market or bilaterally, outside the Energy Derivatives Market, the Timestamps are received in accordance with the provisions of point D of this Decision".

B. The curtailment of Priority Price-Taking Buy Orders in the Day-Ahead Market, it is applied per Market Time Unit, in the following sequence:

1. Buy Orders corresponding to trades that have been conducted within the Energy Derivatives Market, and have been nominated to ETSS through validated Physical Offtake Nomination, and to trades that have been concluded on Energy Financial Instruments bilaterally outside the Energy Derivatives Market and have been nominated to ETSS through validated Physical Offtake Nomination, with the exemption of Buy Orders corresponding to Exports using confirmed nominated Long-Term Physical Transmission Rights and Buy Orders corresponding to Losses of the Transmission System.

2. Buy Orders corresponding to Exports using confirmed nominated Long-Term Physical Transmission Rights.
3. Sell Orders corresponding to deviations of the forecasted production of RES and CHP Units that are submitted by the Last Resort RES Aggregator in association with the Sell Orders that have been created as a result of the participation of the Last Resort RES Aggregator in the Energy Derivatives Market or bilaterally, outside the Energy Derivatives Market.
4. Sell Orders corresponding to deviations of the forecasted production of RES and CHP Units that are imported by DAPEEP in association with the Sell Orders that have been created as a result of the participation of DAPEEP in the Energy Derivatives Market or bilaterally, outside the Energy Derivatives Market.
5. Sell Orders submitted by HEnEx S.A. on behalf of the Last Resort Supplier and are associated with the Sell Orders for a Supplier that has been deleted from the Participant Register and exclusively for the Delivery Day D following its deletion by HEnEx S.A.
6. Buy Orders submitted by HEnEx S.A., with the procedure of Trading on Behalf, on behalf of each Supplier operating in Crete and corresponding to the forecasted electric load of Crete, throughout the Operation of the hybrid model of the Small Connected System Of Crete.
7. Sell Orders submitted by the HTSO corresponding to Transmission System Losses, including those that correspond to transactions carried out within the Energy Derivatives Market, and have been declared to the ETSS through a validated Physical Offtake Nomination, and transactions that have been carried out on Energy Financial Instruments bilaterally, outside the Energy Derivatives Market and have been declared to the ETSS through a validated Physical Offtake Nomination.

As for the Priority Price-Taking Buy Orders that are curtailed subject to the above provisions, within the same category, the selection is made according to the Timestamp at the moment they were entered into the ETSS, meaning within the same category, while the first to be curtailed are the ones that have been the last to be entered in the ETSS. As for the Priority Price-Taking Orders that correspond to Orders that are created as a result of their participation in the Energy Derivatives Market or bilaterally, outside the Energy Derivatives Market, the Timestamps are received in accordance with the provisions of point D of this Decision ".

- C. In case the Clearing Price of the Day-Ahead Market and/or Intra-Day Market is between the Minimum and the Maximum Order Price of the Day-Ahead Market and/or Intra-Day Market, the curtailment of the Buy (or Sell) Orders is made based on the Timestamp at the moment they were entered into the ETSS, meaning that the first to be curtailed are the ones that have been the last to be entered in the ETSS.
- D. The Timestamp of Priority Price-Taking Orders corresponding to Physical Delivery/Offtake Nominations, takes into account the time of submission of the respective accepted/final Physical Delivery or Offtake Schedule Report. In particular, upon completion of the submission process of the Physical Delivery and Offtake Schedules and the implementation of these validation checks, the Energy Trading Spot System (ETSS) of HEnEx creates the respective Sell/Buy Orders with Priority Price-Taking, taking into account the time sequence of the Timestamps regarding the submission of Physical Delivery/Offtake Nominations.

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, 14 October 2021
The President of RAE

Assoc. Prof. Athanasios
Dagoumas