

**Form for the submission of comments to the proposed
Multiple NEMO Arrangement (MNA) for the Croatian bidding zone in accordance with
Article 45 and Article 57 of the Commission Regulation (EU) 2015/1222 of 24 July 2015
establishing a Guideline on Capacity Allocation and Congestion Management**

FORM FOR PARTICIPATION IN CONSULTATION WITH STAKEHOLDERS	
Title of proposed regulation or enactment	<i>Multiple NEMO Arrangement (MNA) for the Croatian bidding zone in accordance with Article 45 and Article 57 of the Commission Regulation (EU) 2015/1222 of 24 July 2015 establishing a Guideline on Capacity Allocation and Congestion Management</i>
Name of the body responsible for writing the proposal	<i>Croatian Transmission System Operator Plc.</i>
Title or first and last name of the stakeholders representative	<i>Ms Michela Beltracchi Senior Adviser Public & Regulatory Affairs Nord Pool</i>
Address of the stakeholders representative	<i>Nord Pool Postbox 121 1325 Lysaker, Norway</i>
First and last name of the person (persons) drawing the comments or person authorised to represent the stakeholders representative	<i>Chanpreet Talwar Birgit Kunze Michela Beltracchi</i>
Interest, that is category and number of users represented by you	<i>Nord Pool is a Nominated Electricity Market Operator that intends to start operating in Croatia.</i>
Permission to publish these comments and suggestions with the name of the stakeholder representative or anonymously (write + in front of the option chosen)	<i>Publication with the name of the stakeholders representative</i>
	<i>Anonymous publication</i>
Date:	

Michela Beltracchi

(signature of authorised person)

Note:

1. Please enter below general comments to a proposed regulation or enactment and suggestions for individual articles. Tables can be expanded.

General comments to the proposed regulation or enactment

As a NEMO that intends to start operations in Croatia as soon as possible, Nord Pool welcomes HOPS' consultation on this MNA.

As a general point, in order to ensure the establishment of a fair competitive level playing field for NEMOs in Croatia and compliance with Article 7(2) (ca) of Regulation 2024/1747 as regards improving the Union's electricity market design, Nord Pool believes that the Croatian MNA should include:

- a) clear and explicit prohibition on running local auctions in the event of partial decoupling;
- b) clear provisions to ensure that, in such situations, the Single Day-Ahead Price for the Croatian bidding zone, as calculated by the NEMO(s) remaining in the market coupling, is the sole relevant price for the Croatian bidding zone; and
- c) the option for decoupled NEMOs to offer their market participants the possibility to settle at least part of their volumes through volume allocation.

We include our detailed comments below.

Comments and suggestions for individual articles in the regulations or enactments with explanation that is supporting documentation

Preamble	
Article 1	
Article 2	
Article 3	<p>Article 3 Application of this MNA:</p> <ul style="list-style-type: none"> The following paragraph, Nord Pool EMCO proposes to include “coupling” wording below – <ul style="list-style-type: none"> <i>This MNA applies to Pre-coupling, Coupling and Post-coupling arrangements, which shall enable more than one NEMO in the Croatian bidding zone access to cross-zonal capacity in the day-ahead and intraday timeframe.</i>
Article 4	
Article 5	<p>Article 5 Pre-coupling arrangements for single day-ahead coupling:</p> <ul style="list-style-type: none"> The following paragraph, Nord Pool EMCO proposes to include reference to aligning the implementation guides with NEMOs during the implementation phase of the MNA project – <ul style="list-style-type: none"> <i>HOPS shall define the content, file formats and exchange protocols for data exchange between HOPS and the NEMOs in the Croatian bidding zone. Detailed information is provided within the relevant central, regional and local implementation guides and documents.</i>
Article 6	<p>Article 6 Delivery and validation of single day-ahead results:</p> <ul style="list-style-type: none"> The following paragraph, Nord Pool EMCO proposes to remove the text in brackets – “single day-ahead price and net position for the Croatian bidding zone and net position and price for each of the NEMO Trading Hubs in the Croatian bidding zone” as this detail is quite specific to be outlined in the MNA, which potentially could be addressed during the implementation phase - <ul style="list-style-type: none"> <i>Each NEMO offering services in the Croatian bidding zone shall deliver the single day-ahead coupling results (single day-ahead price and net position for the Croatian bidding zone and net position and price for each of the NEMO Trading Hubs in the Croatian bidding zone) to HOPS and the CCC in accordance with Article 48 of the CACM Regulation. HOPS is responsible for verifying that the results have been calculated within the validated CZCs and ACs. Each NEMO offering services in the Croatian bidding zone shall ensure and verify that the single day-ahead coupling results are based on the orders submitted by that NEMO and that these orders have been correctly represented in the coupling algorithm.</i>
Article 7	<p>Article 7 Post-coupling: roles and responsibilities:</p> <ul style="list-style-type: none"> The following paragraph, Nord Pool EMCO proposes to remove it – the inclusion of this paragraph is out of scope for the MNA, in our view. Alternatively, could further clarification be provided on the inclusion of this paragraph <ul style="list-style-type: none"> <i>If no agreement is reached six months before proposed Go-Live the shipping arrangements shall be decided by the regulatory authorities responsible for the bidding zones between which the clearing and settlement of the energy exchange is needed.</i>

Commented [MB1]: @Adam Langridge : – please comment if you advise to add more information or amend.

Article 8	
Article 9	<p>Article 9 Decoupling cases requires an amendment:</p> <ul style="list-style-type: none"> • The following paragraph should be replaced with the one below to reflect the agreement between NEMOs to use VA-SDAC: <ul style="list-style-type: none"> ○ <i>“For the decoupled NEMO Trading Hubs not participating in the market coupling, the NEMOs shall strive to clear the bids received while remaining compliant with Regulation (EU) 2024/1747 on the Electricity Market Design Reform, in particular with respect to ensuring a Single Day-ahead Price for the Croatian Bidding Zone.”</i> ○ <i>“For day-ahead market coupling, the Croatian NEMO(s) not participating in the market coupling shall not organise local auction but may offer to their market participants the possibility to have at least some of their volumes on their platform(s) settled at the Single Day-ahead Price by way of volume-allocation.”</i>
Article 10	
Article 11	<p>Article 11 Price Reference for the Croatian Bidding Zon Price for Intraday Timeframe:</p> <ul style="list-style-type: none"> • The following paragraph, Nord Pool EMCO proposes to remove wording “foreseen” along with minor editorial amendments: <ul style="list-style-type: none"> ○ <i>No reference price is applicable for intraday auctions (IDA’s), as there is no local auction as a fallback in the event of partial or full decoupling of the Croatian Bidding Zone by Croatian NEMOs. In such cases, either at least one NEMO remains coupled and the Croatian price for the respective IDA is the clearing price from that auction, or there is no Croatian price determined for that IDA.</i>
Article 12	
Article 13	
Article 14	
Article 15	
Article 16	
Article 17	<p>Article 17 Fallback arrangements:</p> <ul style="list-style-type: none"> • The following paragraph, Nord Pool EMCO requests for clarification on its inclusion. In our view, the fallback arrangement is already covered in the MNA. <ul style="list-style-type: none"> ○ <i>Fallback procedures shall be initiated in accordance with Art. 50 of CACM Regulation.</i> ○ <i>In the case of a decoupling of one, more or all Croatian NEMO Trading Hubs from the SDAC or SIDC, regardless of whether SDAC or SIDC remains coupled with regard to the other NEMO Trading Hubs partially or fully decoupled on the level of Bidding Zones, the SDAC and/or SIDC fallback arrangement shall be applied to the decoupled NEMO Trading Hubs within the Croatian Bidding Zone.</i>
Article 18	
Article 19	
Article 20	