Joint statement of the TSOs regarding the public consultation comments on the drafts of "Rules for Daily Capacity Allocation on Swiss Borders"

Amprion, APG, RTE, Swissgrid, Terna, TransnetBW

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On behalf of the TSOs, JAO organised the public consultation on the proposed amendments of the "Rules for Daily Capacity Allocation on Swiss Borders" between 27th October and 26th November 2025. This report presents the comments received during the consultation period, along with the corresponding responses from the TSOs.

Public consultation comment #1

MP's comment:

"Hi All

I just read the document 'Rules for daily capacity allocation on Swiss borders'

Article 31 paragraph 3 says:

The allocation platform shall determine the auction results using an optimization function aiming at maximization of the sum of the registered participants' surplus and the Congestion Income generated by the winning bids while respecting the constraints of the optimization function in form of relevant offered capacities. The allocation platform shall publish additional explanatory information on the optimization function of the algorithm on its website.

Is there already additional explanatory information or can you explain in simple words how the determination of the auction results will work? How will blocks be taken into account? How is the Mix handled, blocks vs. quarterly hours?

Thanks for your explanations ..."

Response of TSOs:

We have reached out to our IT provider to clarify what information about the algorithm and the functioning we can share with market participants at the current project status.

Public consultation comment #2

MP's comment:

"Dear Sir or Madam,

We would like to thank for the opportunity to comment on the proposed amendments of the "Rules for daily capacity allocation on Swiss borders".

*** strongly supports all market innovations that enhance the efficiency of the Swiss and wider European power system. However, it is also important to consider physical constraints. A significant

share of Swiss electricity production — particularly hydropower and nuclear generation — operates with technical minimum run times and down times of at least 60 minutes. Therefore, it is essential to ensure the continued functionality and market acceptance of 60-minute products following the introduction of 15-minute products. In this context, *** is interested in gaining a better understanding of how the JAO algorithm works. Specifically, we would like to understand better how 60- and 15-minute products are jointly optimized and how paradoxical rejections of 60-minute bids are avoided. To our understanding, the proposed set-up favours 15-minute bids, among other things due to the fact that 60-minute bids cannot be partially accepted.

*** supports the introduction of 15-minute products only under the condition that 60-minute products remain fully considered and accepted in all cases. If this is not feasible, we consider the current set-up with an auction of 60-minute products and nominations in 15-minute granularity, to be a viable alternative. We ask JAO to further explain the functioning of the algorithm and engage with market participants before implementing the proposed amendments.

Kind regards, ..."

Response of TSOs:

We have reached out to our IT provider to clarify what information about the algorithm and the functioning we can share with market participants at the current project status.

Additionally, we would like to better understand your comment. We are aware that in other markets, participants sometimes express concerns about their block bids being matched. However, based on our understanding, in markets with marginal pricing this should only be relevant for bids that are very close to the marginal price or for bids that set the marginal price themselves. If your bid price is significantly higher, there should be no risk of your block bid being rejected. We would greatly appreciate your feedback on these considerations.