Joint statement of the TSOs regarding the public consultation comments on the drafts of the Long-Term and Day-Ahead Allocation Rules for the Bidding Zone Border Serbia-North Macedonia (RS-MK)

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EMS, MEPSO

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30/10/2025

On behalf of the TSOs (EMS and MEPSO), JAO organised the public consultation between 6th and 21st October 2025 on the following documents:

- 'Rules for Explicit Daily Capacity Allocation on Bidding Zone border serviced by JAO' and its 'Border specific annex for Serbia-North Macedonia'
- 'Harmonised Allocation Rules' and its 'Border Specific Annex for the Bidding Zone border North Macedonia-Serbia'

This report presents the comments received from market participants during the consultation period, along with the corresponding responses from the TSOs and/or JAO.

# **Public consultation comment #1**

# MP's comment:

"Dear all,

With reference to Annex 1 (Serbia–North Macedonia) to the Rules for Explicit Daily Capacity Allocation, we note that Article 2 (Auction Specification) currently provides that:

the Allocation Platform publishes the Auction Specifications no later than 10:05 Central European Time (CET) on the day before delivery (D-1), and

the Bidding Period runs from 10:05 to 10:35 CET on D-1.

As you know, North Macedonia's power exchange (PX) MEMO has its day-ahead market (DAM) gate closure time (GOT) at 10:35 CET.

If market participants do not yet know the amount of daily cross-zonal capacity allocated to them by that moment, they are effectively unable to submit informed orders in the day-ahead auction on MEMO.

To ensure functional coupling between the explicit capacity allocation and participation in the North Macedonian DAM, we respectfully propose the following adjustments for the Serbia–North Macedonia border:

Keep the current Bidding Period unchanged:

from 09:00 to 09:30 CET on D-1.

This provides sufficient time for validation and publication of results before MEMO's dayahead GCT at 10:35.

Publish Auction Specifications earlier:

The Allocation Platform should publish the Auction Specifications no later than 08:55 CET on D-1.

(Under the current draft, the publication deadline is stated as 10:05 CET on D-1.

*In case of postponement of the Auction:* 

Publish the Auction results no later than 10:05 CET on D-1.

(We note that the current fallback text foresees publication no later than 11:05 CET; our proposal advances this to preserve participation in the day-ahead auction on the PX).

These changes would allow market participants to receive firm capacity allocations in time to place orders in the day-ahead auction of MEMO, thereby supporting liquidity and efficient cross-border trading on this border.

Thank you for your consideration. ..."

## **Response of TSOs:**

We appreciate your feedback and can confirm that it will be taken into consideration during the finalisation of the rules, reflecting the following revised timings for the RS<>MK daily auctions:

Auction Specification publication: no later than 8:55

Bidding period: 8:55-9:25

Auction results in case of postponement: no later than 9:55

# **Public consultation comment #2**

## MP's comment:

"Dear JAO Team,

We are writing to you in the context of the ongoing public consultation for the transition of MK-RS border capacity allocation from EMS to JAO.

As a company based in North Macedonia, we understand that registration with JAO will be required in order to participate in the upcoming annual and monthly auctions, expected to be held in December 2025. In this regard, we would kindly appreciate clarification on the following:

1. Will JAO take over the auctions in MK-RS border for annual 2026 and January 2026, which are expected to occur during December 2025?

If yes, considering that until end of October the rules have not entered into force and the process cannot be initiated, do you consider the remaining timeframe given to companies to register with JAO, generate the certificate and obtain the ACER sufficient to allow them to participate in these auctions? In our understanding the process is long and might be difficult to complete in merely 1 month (November only). This would risk non-participation in the auctions for a cause outside of the companies control.

But, if the annual 2026 and January 2026 auctions (carried out in December) will continue with MEPSO, where will the resale be performed (in MEPSO or JAO platform)?

2. Can a company registered in North Macedonia (a non-EU country) obtain an ACER code, considering that North Macedonia is not a member of the European Union? If yes, could you please provide guidance or a reference to the applicable process?

We appreciate your support during this transition phase and look forward to your feedback to ensure our timely compliance with all requirements. ..."

### Response of TSOs and JAO:

Thank you for your comment.

1. Yes, we confirm that JAO will organise the long-term auctions for yearly 2026 and January monthly 2026 products.

2. JAO has recently published information on the upcoming go-live of the new borders and on the registration process: <a href="http://www.jao.eu/news/launch-adria-explicit-auctions-jaos-platform">http://www.jao.eu/news/launch-adria-explicit-auctions-jaos-platform</a>

In this message, market participants are advised to already register with JAO, even though the new borders are not yet covered in the Participation Agreement. The registration can later be amended once the rules and updated registration documents are available.

For more information on the registration process, please consult our <u>Registration</u> <u>Guide</u> available on our website or request an onboarding call by registering in our <u>Service Desk.</u>

# **Public consultation comment #3**

### MP's comment:

"Dear Sir/Madam,

I am writing to you on behalf of the company \*\*\*.

Our company is registered in the DAMAS system, for participation in the daily and intra-day auctions on the Macedonia - Serbia border.

It is in our great interest to register on your platform, so that we can continue our participation in the daily and intra-day auctions on the Macedonia - Serbia border from the moment it is migrated to your platform.

Since this will be our first registration, and also our first participation on your platform, we would like you to familiarize us with the process of registering our company, the required documentation, and issuing digital certificates for access to the JAO platform.

We are looking forward to a long and successful cooperation. ..."

### Response of TSOs and JAO:

Thank you for your comment. JAO has recently published information on the upcoming golive of the new borders and on the registration process: <a href="http://www.jao.eu/news/launch-adria-explicit-auctions-jaos-platform">http://www.jao.eu/news/launch-adria-explicit-auctions-jaos-platform</a>

In this message, market participants are advised to already register with JAO, even though the new borders are not yet covered in the Participation Agreement. The registration can later be amended once the rules and updated registration documents are available.

For more information on the registration process, please consult our <u>Registration Guide</u> available on our website or request an onboarding call by registering in our <u>Service Desk.</u>

## **Public consultation comment #4**

### MP's comment:

"Dear JAO consultation team,

we would like to raise a concern regarding the recently announced changes to the gate closure times for daily capacity bidding.

Please find below a comparison table outlining the current and new gate closure times, along with the corresponding power exchange (PX) closure times:

Border	<b>Current Gate Closure</b>	<b>New Gate Closure</b>	PX Closure
ME<>RS	09:30	10:00	MEPX at 10:15
ME<>IT	10:00	10:05	MEPX at 10:15
MK<>RS	09:30	10:35	MEMO at 10:35

Our concern stems from the fact that the updated gate closure times are scheduled very close to the respective power exchange closure times. This significantly reduces the time available for market participants to adjust and finalize their bids, which may impact the efficiency and reliability of the bidding process.

In light of this, we would appreciate clarification on whether there are any plans to adjust the PX gate closure times accordingly to ensure sufficient time remaining between the capacity allocation results and the closure of the power exchanges.

Thank you for your attention to this matter. We look forward to your response. ... "

## **Response of TSOs:**

We appreciate your feedback and can confirm that it will be taken into consideration during the finalisation of the rules, reflecting the following revised timings for the RS<>MK daily auctions:

Auction Specification publication: no later than 8:55

Bidding period: 8:55-9:25

Auction results in case of postponement: no later than 9:55

For the borders ME<>RS and ME<>IT, our responses will be provided in the relevant public consultation report.