Evaluation of comments from the public consultation on the amendment to the Technical Specification of External Interfaces ISOT 1.24

P. č.	Provision number	Proposed amendment to the provision (text of the commented provision with amendments in track changes mode)	Explanation of the proposed amendment / comments on the provision	Additional information (optional)
1	*New provision – Extension of the WebSocket and Web API interface specifications (chapters defining the structure of WebSocket messages and Web API error states) – Draft ISOT Technical Specification of External Interfaces, version 1.24*	A. Extension of the WebSocket interface to include system notifications: It is proposed to add a new system message type (e.g. “systemStatus”) or extend the existing “marketStatus” message to include information on planned maintenance and system status in the following structure: { "messageType": "systemStatus", "status": "maintenanceScheduled" | "maintenanceInProgress" | "systemRestored", "maintenanceStart": "YYYY-MM-DDTHH:mm:ssZ", "maintenanceEnd": "YYYY-MM-DDTHH:mm:ssZ", "estimatedRecoveryTime": "YYYY-MM-DDTHH:mm:ssZ", "description": "Plánovaná technická údržba obchodného jadra XMtrade/ISOT"	1. Description of the current situation and operational issue: The current version of the technical specification lacks a mechanism that would notify market participants’ automated systems in real time via WebSocket about planned maintenance windows or trading core outages. Currently, maintenance on the OKTE side generally results in an abrupt interruption of the WebSocket connection at the transport/network level without any application-level information. Client code cannot distinguish whether this is a local loss of connectivity or planned intervention by the market operator. This causes: - An inability to correctly inform operators and dispatchers in client applications about system status directly in the user interface. - The triggering of reconnection loops by participants. 2. Benefits of the proposed amendment: - Protection of and reduced load on OKTE infrastructure: After receiving a maintenance message, participant systems will switch to passive mode and will not burden	To maintain backward compatibility, the message may be published either through an existing public WebSocket channel or through a new dedicated topic intended exclusively for infrastructure system statuses (system/status)

		} B. Standardisation of Web API error states during maintenance: During an ongoing maintenance window or technical unavailability of the trading core, the API shall return the HTTP status code 503 Service Unavailable, mandatorily accompanied by the standard HTTP header Retry-After: <seconds> and a JSON payload containing the estimatedRecoveryTime attribute.	OKTE servers with repeated queries throughout the period of unavailability. - Increased reliability of dispatch control: Client systems will be able to immediately display the precise estimated service restoration time without the need to manually check notices on the OKTE web portal	
	OKTE's response: **Rejected.** Scheduled maintenance windows are published on the OKTE website in accordance with Section 1.4.1.3 of the OKTE Operating Rules, under the definition of "Maintenance outage". Unscheduled outages are communicated through a market notification and a notice on the OKTE website. The proposed extension of the interfaces will therefore not be included in this update of the technical specification.			
2	*Provision on making public trades in the Slovak bidding zone available via Web API and WebSocket – Draft ISOT Technical Specification of External Interfaces, version 1.24*	A. Addition of the data schema and a sample message: We request that the technical specification include the exact format and a sample JSON message for public trades (Public Trades) via WebSocket, including a detailed description of all attributes (trade timestamp, period/contract identifier, trade direction, execution price, traded quantity in MW/MWh, anonymised trade ID). B. Extension of public trade coverage: We propose extending the coverage of the public trades made available beyond the	1. Need to specify the data structure: Without an explicit JSON message example and precise data types, it is not possible to reliably prepare the parser and data models in client applications in advance. 2. Informative value of market data: Given the structure of the Slovak intraday market, a limited number of entities account for a substantial share of liquidity. Restricting public trades strictly to the local SK bidding zone provides a distorted view of overall market liquidity and price trends. Displaying trades from the entire coupled XBID market (or relevant cross-border flows) will provide market participants with key information on	If making the entire market available would result in an excessive volume of transmitted data, we recommend introducing an optional filter at the WebSocket subscription level (e.g. the option to subscribe only to SK_trades or XBID_all_trades)

		Slovak bidding zone to include trades executed within the coupled intraday market (XBID affecting the SK bidding zone), or alternatively adding information on the timetable for making the entire coupled market available.	price formation in individual trading periods and enable more effective management of market positions.	
	OKTE's response: **A: Accepted.** The response example and schema have been added to the technical specification. **B: Rejected.** Extending the coverage of public trades from different zone will not be included in this update of the technical specification. The suggestion has been noted as a development proposal, and its feasibility will be assessed as part of future system development.			
3	*Provision on the introduction of bulk order cancellation via WebSocket – Draft ISOT Technical Specification of External Interfaces, version 1.24*	Addition of a client-defined filter to the bulk order cancellation interfaces: We request that the request structure for bulk order cancellation in the WebSocket interface be extended to include filtering based on client-defined identifiers: 1. Addition of the optional filter parameter clientOrderIdPrefix (filtering based on the prefix of the client order ID), and/or 2. Addition of a new optional attribute tag (or portfolioId / assetId) to the order submission structure (OrderCreate), and subsequently making it available as a selection filter in the bulk cancellation request. If neither of the optional parameters tag and clientOrderIdPrefix is specified in the request, cancellation shall apply to all orders matching	1 Insufficiency of the existing filters: In the proposed version v1.24, only market parameters (productType, direction, deliveryFrom, deliveryTo) are available for bulk cancellation. These filters are insufficient from the perspective of modern portfolio management because they do not allow orders to be distinguished and selectively cancelled according to a specific technical asset or autonomous trading algorithm. 2. Operational safety and management of battery energy storage system (BESS) flexibility: A market participant operates under a single participant account while simultaneously optimising and managing fundamentally different portfolios. Battery storage facilities may encounter situations requiring immediate safety intervention (e.g. a technical fault in the inverter/cooling system, a communication outage, an unexpected change in state of charge (SoC), or a sudden change in control strategy). At such a moment,	The proposed solution is backward compatible and does not require a change in logic for participants who do not use client-defined order classification.

		the market filters in accordance with the original specification.	it is essential to withdraw, within milliseconds, only the offers belonging to the BESS concerned. 3. Benefits: Increased technical safety in BESS operation and flexibility aggregation, preservation of trading stability for the participant's other technologies, and optimisation of data traffic to the OKTE core.	
	OKTE's response: **1: Rejected.** The technical specification supports bulk order cancellation using a list of order IDs. Market participants can therefore select the relevant orders in their own systems and submit a request to cancel them in bulk. **2: Rejected as part of this update of the technical specification.** Additional order attributes will be addressed as part of the implementation of changes arising from REMIT II.			
4	*Provision on extending information on the current status of participants' limits, including the request limit, Order Per TimeFrame and Order to Trade Ratio (OTR) limits – Draft ISOT Technical Specification of External Interfaces, version 1.24*	We request that the technical specification include: 1. The precise mathematical definition and methodology for calculating the OTR indicator (whether it is the ratio of the number of messages/modifications to the number of executed trades, or a ratio of volumes in MWh, and the length of the assessment interval). 2. The specific numerical values of the applicable limits (Request Limit, Order Per TimeFrame and OTR thresholds). 3. A clear specification of the consequences of reaching a limit – distinguishing between a warning indicator (Soft limit) and restrictive blocking/throttling of requests (Hard limit).	Market participants' advanced trading algorithms use strategies that dynamically maintain the best bid or ask in the order book (so-called pole position at the Best Bid / Best Ask). These market strategies naturally require frequent repricing and adjustments to submitted quantities in response to market developments, which naturally generates a higher OTR even during standard and legitimate trading. If OTR limits are set non-transparently or too restrictively, there is a risk of unintentionally blocking a participant's legitimate trading strategies. Participants need to know the precise calculation logic and numerical thresholds in advance so that they can adjust the configuration of their algorithms and market-event filtering in time without risking an interruption to trading.	We recommend introducing staged warning notifications (e.g. upon reaching 80% of a limit) directly through the WebSocket interface, allowing participants to automatically reduce the frequency of queries before there is a risk of the interface being blocked.

	OKTE's response: **1 and 2: Rejected.** This information will be addressed in an amendment to the OKTE Operating Rules. **3: Rejected.** The requested information is already included in the proposed changes to the technical specification. Section 3.3.11 "Limits" distinguishes, through the enforcement parameter, between monitoring mode (monitor) and rejection of requests when a limit is exceeded (reject). It also describes the current limit usage, the remaining number of requests or operations, and the time until the limit resets. Section 3.4.3 allows automatic WebSocket notifications to be configured through the limitstep parameter, either when a specified number of counted requests or operations is reached or when the remaining number falls to a selected value. Participants can therefore monitor their limit usage and adjust their request frequency in time.