



# **Fundamental Data Transparency: EURELECTRIC Preliminary Views on the Draft Comitology Guidelines**

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## General Comments

- EURELECTRIC welcomes the Draft Comitology Guidelines for EU-wide harmonised & binding transparency rules for fundamental data as previously advocated.
- Increasing transparency is a key factor to ensure integrity of EU electricity markets, remove barriers for new entrants, improve liquidity and promote market integration
- In general, we see a need to align generation, load, and transmission data requirements with regards to aggregation/threshold level and frequency of data disclosure
- A cost-benefit perspective must be kept in mind: sometimes quality of the data is more important than quantity



## Specific Comments - Generation Data:

- Ex-ante information such as overhaul planning or outage duration should be disclosed on a best effort basis (no companies' liability)
- Platform operators should perform “plausibility checks” to control that data is plausible and complete
- On the aggregation level (unit by unit) of disclosure there is no full consensus in EURELECTRIC:
  - Potential competition issues (i.e. risk of collusion) should be carefully assessed in close cooperation with relevant authorities
  - In certain markets (e.g. Nord Pool) implementation would cause conflict with current rules
  - In other markets, small players are concerned about potential competitive disadvantages as a result of this disclosing obligation



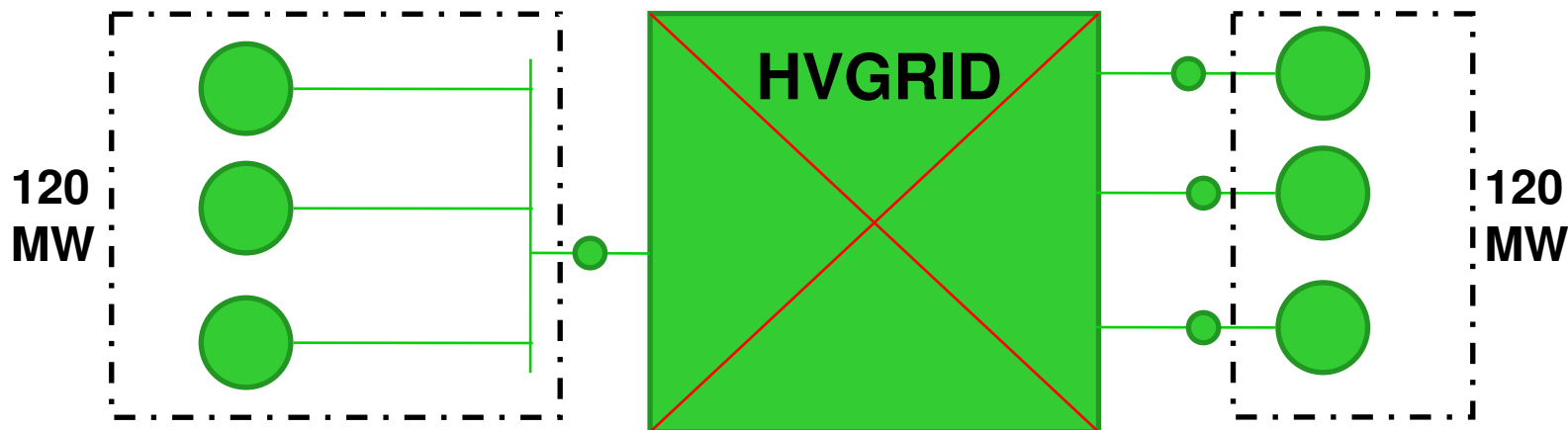
## Specific Comments - Generation Data:

- The definition of “unit” is unclear and needs to be better specified (see next slide)
- We agree that information on unplanned generation outages should be disclosed immediately when “expected” longer than 1 hour; however, cause and duration can frequently remain unclear for some time after the event
- Information on real time generation output should be disclosed H+1 for each hour
- Minimum unit size for information disclosure should be 100MW



## Specific Comments – Unit Definition:

*Generation Unit is understood as an electro-mechanical, or electronic facility for generation of electricity (2.5.4)*



**Plant with 3 units 40 MW connected via an internal busbar with only one measurement /connection to the grid after the busbar = 1 unit with disclosure obligations?**

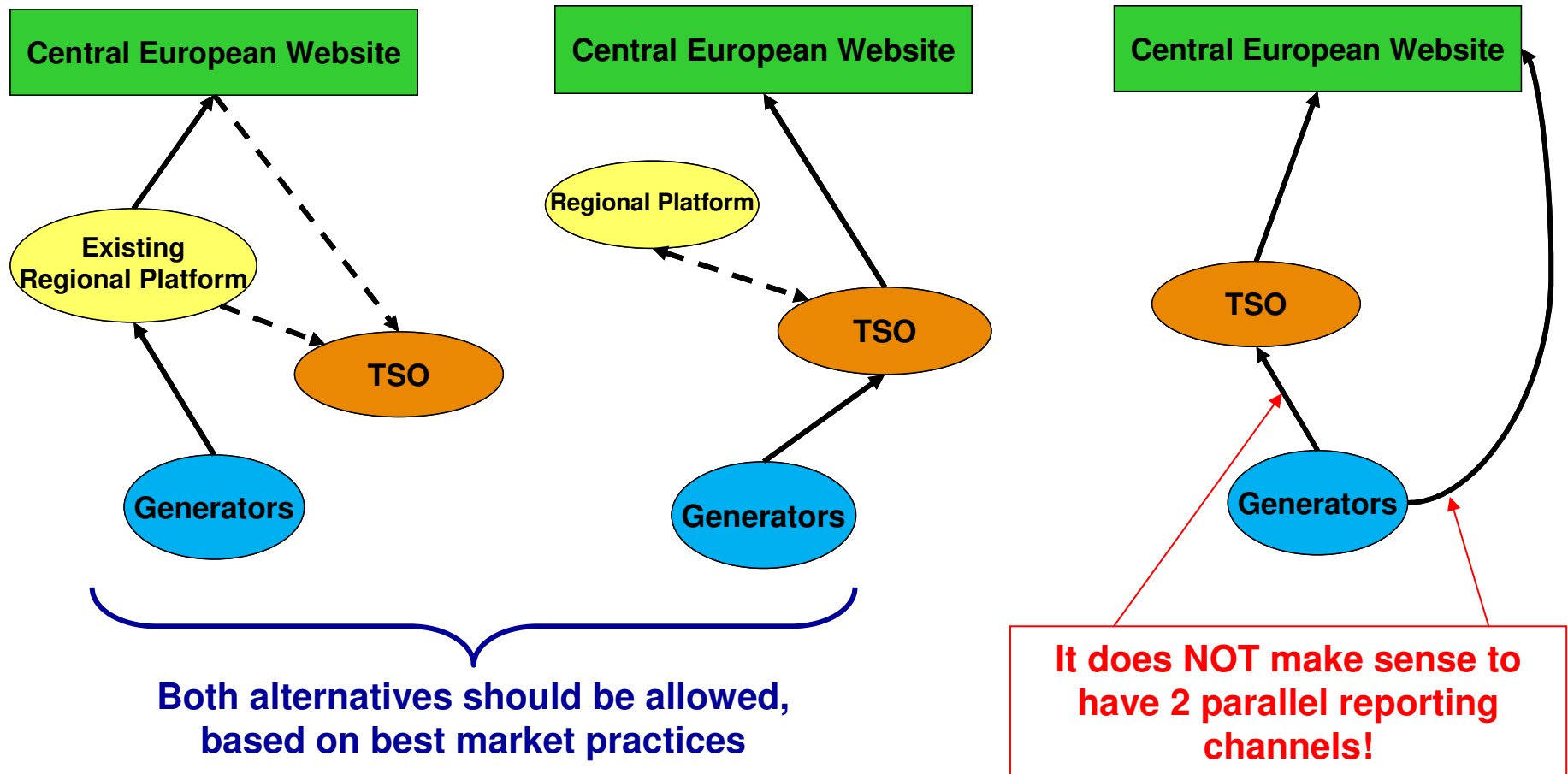
**Plant with 3 units of 40 MW individually connected-measured to the grid = 3 units without disclosure obligations?  
(and what if 3 different owners? )**



## Specific Comments – Means of Reporting and Publication

- Full harmonisation of definitions, reporting requirements and procedures is the first priority
- Parties must have the right to decide through which channel they disclose data (e.g. to PXs or TSOs which report to the central platform on their behalf) subject to NRA approval:
  - Maximum use of existing (and well functioning!) PXs regional platforms should be allowed
- Centralised platform solution is welcomed, although ENTSO-E central role raises concerns on stakeholders involvement
- Costs for TSOs **and** suppliers of information should be considered!

# Data publication: 1 Central Platform + 1 single reporting channel to TSOs OR PXs





# Specific Comments - Transmission and Interconnectors

- Best information available to TSOs should be made available to all market parties to have a comprehensive view of the market
  - Nowadays RES output (wind & solar forecasts + actual production) is much more important for price formation than info on individual power plants: several thousands MWs vs. few hundreds!
- An additional chapter creating the necessary transparency for congestion management (redispatching) is necessary