

Päivi Aaltonen  
10.5.2006

Mrs Una Shortall  
Council of European Energy Regulators (CEER)  
Rue le Titien, 28  
B 1000 Bruxelles  
Email: transparency@ergreg.org

## **ERGEG proposal for Guidelines for Good Practice on Information Management and Transparency in Electricity Markets - comments by Finnish Energy Industries**

Finnish Energy Industries wishes to provide its contribution in preparing ERGEG's guidelines on good practice transparency in electricity market. We hope that these comments are taken into consideration by ERGEG.

Finnish Energy Industries supports the comments provided by Eurelectric. In addition, we wish to point out some further comments.

The ERGEG proposal as well as Eurelectric Position Paper on Market Transparency list a large set of information describing present and future situation in consumption, production, transmission system and trading that are needed to provide an equal position for all market operators and other interested parties in order to understand backgrounds in electricity price formation. This information in addition to Guidelines on Congestion Management prepared by the Commission will provide tools to form a good picture of functioning of electricity market. In our point of view the **information of unavailability of significant consumption units** is equally relevant as information on significant production outages and therefore should be added to the list.

The European CO2 Emissions Allowances Trading Scheme has proven to have, among others, a significant effect on electricity market price formation. Therefore, in order to increase transparency in electricity market, there is **an urgent need to increase and harmonise transparency on Emission Allowances market**. As Emission Allowances market is significantly influenced by information in possession of political decision makers and regulators it is important that transparency requirements include also these parties.

As the amount of information on power system and electricity market situation will be great after implementing these guidelines we wish to emphasize the importance of **easy-to-access and easy-to-understand way of publishing the information**. This way all parties, including small enterprises, have equal possibilities to exploit it.

Yours sincerely,

Juha Naukkarinen  
Managing Director  
Finnish Energy Industries

CC

Finnish Energy Market Authority