



Public Power Corporation  
30 Chalkokondili str.  
104 32  
Athens  
Greece

To  
Mrs. Fay Geitona  
ERGEG

28/10/2010

**Answers to the questions concerning the text "Draft Comitology Guidelines on Fundamental Electricity Data Transparency"**

Dear Mrs. Geitona

We send you the answers to the questions of the abovementioned text which was published as of the 8<sup>th</sup> of September 2010.

**General issues**

- 1. Are there additional major problems or policy issues that should be addressed by the draft Comitology Guideline on Fundamental Electricity Data Transparency?**

**Answer:** There are no additional major problems or policy issues that should be addressed by the text.

- 2. What timescale is needed to implement the Comitology Guideline on Fundamental Electricity Data Transparency seen from your organisation's point of view?**

**Answer:** The disposal of ex-ante and ex-post dispatching period data concerning unit availabilities as well as short and long term load forecasts already exist and are submitted according to the Hellenic Grid and Power Exchange Code to the HTSO. The timeframe of these

operations are close more or less to the one specified in the text. Validated ex-post metering data as well as aggregate figures are in the responsibility of the TSO.

**3. Do you see a need for more firm specification of the role of each market participant in delivering transparency data to the TSO/information platform in the Comitology Guideline on Fundamental Electricity Data Transparency?**

**Answer:** Yes we consider that the specification of the role of each participant as well as the data for the disposal of which he will be responsible, is needed.

**4. Do you see a need for more firm specification of the role of the TSO in collecting data in the Comitology Guideline on Fundamental Electricity Data Transparency?**

**Answer:** Yes it is needed

**5. Taking into account the interface between wider transparency requirements and the costs of data storage, do you consider storage of basic data for 3 years, to be made available for free, as sufficient?**

**Answer:** Yes it is sufficient.

**6. Are the suggested market time units for information reporting and publication requirements adequate and compatible with wider transparency in a European perspective?**

**Answer:** Since each market has different time units of operation, it is considered that both the wording of the legally binding text as well as the presentation of data in ENTSO's Platform, will be customized to the necessities of each bidding area.

**7. How do you see the costs and benefits of the proposed transparency framework for fundamental data in electricity? If possible, please provide qualitative and/or**

**quantitative evidence on the costs and benefits or ideas about those.**

**Answer:** If data presentation facilities will be implemented in the platform, there will surely be the benefit of acquiring data for benchmarking in an agreed, understandable, with common terminology and timely way, instead of searching each TSO's website and understanding the terminology used as well as its market organization.

### **Load issues**

**8. Do you see a need for publication of load data linked to different timeframes or an update of load data linked to different timeframes than those suggested in the draft document?**

**Answer:** If validated ex post values are needed (values used in settlement and billing) then these are to be disposed by the TSO. In this case the timeframe has to follow the capabilities of the TSO's AMRs .

**9. The draft document suggests that the information on unavailabilities of consumption units is disclosed in an anonymous manner identifying the bidding area, timeframes and unavailable load. Do you consider these pieces of information sufficient for the transparency needs of the internal wholesale electricity market or should also the name of the consumption unit be published?**

**Answer:** These pieces of information are sufficient.

### **Transmission and interconnectors**

**10. Should the publication obligations regarding planned or actual outages of the transmission grid and interconnectors require the publication of the location and type of the asset (i.e. identify the part of transmission infrastructure that due to planned outage or a failure is facing a limitation in its transmission capacity) or should the information on transmission infrastructure equipment outage be non-identifiable?**

**Please justify your position why either identified information would be necessary or why only anonymous information on the transmission infrastructure outages should be published.**

**Answer:** Identified information would be necessary so that there can be a verification of incidents which cause the rising of potential clauses in contracted obligations.

**11. The requirement to disclose outages in the transmission infrastructure is proposed to be placed on such events where the impact on capacity is equal to or greater than 100 MW during at least one market time unit. Do you consider this absolute, MW based threshold appropriate, or should the threshold be in relation to e.g. the total generation or load of the bidding area, or alternatively, should the absolute threshold be complemented with a relative threshold? The relative threshold would mean, for example, that the publishing requirement would apply if a planned or actual outage of transmission infrastructure would equal to or be greater than 5 per cent (or any specified percentage value). This question on relative threshold stems from the fact that for some bidding areas the proposed 100 MW threshold may be relatively high. However, raising the general European threshold might in the majority of the European bidding areas lead to too low a threshold and a vast amount of information being reported.**

**Answer:** The threshold of 100 MW is appropriate.

**12. With regard to publishing requirements on congestion (in paragraph 22 (d) and (e)), what kind of information do you consider important to receive and how frequently? Please justify your position.**

**Answer:**

### **Generation**

- 13. Should unavailability of generation infrastructure relate to a given plant or a given unit? Please justify your position.**

**Answer:** It is appropriate to deliver data for every entity that submits bids.

- 14. The draft document proposes that actual unit by unit output for units equal to or greater than 10 MW be updated real time as changes occur. Do you consider the 10 MW threshold for generation units appropriate?**

**Answer:**

- 15. The requirement to disclose hourly information on actual aggregated generation output is now related to generation type. Should this threshold be linked to fuel requirements or generation technology?**

**Answer:** We should remain to the present status.

### **Balancing and wholesale data**

- 16. The transparency requirements on balancing have been widened compared to the Transparency Reports prepared within the framework of the Electricity Regional Initiatives. Is the proposed list of data items sufficient - also taking into account the evolution towards cross-border balancing markets?**

**Answer:** The functioning of cross – border balancing markets will require additionally the disclosure of pricing data which will be specific to the rules that will govern their operation.

- 17. The transparency requirements on wholesale market data have been deliberately left outside the draft Guidelines as they will most likely be addressed by other legal measures that are currently under preparation. Should some basic wholesale data, i.e. information on aggregate supply and demand curves, prices and volumes for each standard traded product and for each market timeframe (forward,**

**day-ahead, intraday) as well as prices and volumes of the OTC market still be part of the Comitology Guideline on Fundamental Electricity Data Transparency?**

**Answer:** The differences in the organization of markets, products and balancing mechanisms, does not allow the presentation of pricing data in an homogenous manner as well as their comparison. Therefore the idea presently is considered as premature.