



ENTSO-E answer to ERGEG public consultation on Fundamental Electricity Data Guideline

Brussels, 28 October 2010

ENTSO-E welcomes the ERGEG draft proposal of Fundamental Electricity Data Transparency Guideline, which is proposed after a fruitful cooperation with ENTSO-E within a joint WG that also included a representative from the EC. This close cooperation included several meetings and the organisation of two joint workshops. As mentioned by ERGEG in its consultation document, it also allowed ENTSO-E to *"provide valuable input, for example by developing definitions of the transparency requirements"*.

With that Transparency Guideline, ENTSO-E sees a step towards a successful competitive European market, which is one of the objectives of ENTSO-E Transparency Policy. Once applied, it will reinforce TSOs contribution to a correct functioning of this market through the use of a pan-European Transparency platform where the same information for all Member-States will be available free of charge to all market actors : indeed, it will contribute to reinforce an homogeneous level playing field thus increasing competition between different market players. In order to help a successful ERGEG proposal to the EC by December 2010, ENTSO-E offers some comments that all aim at improving the draft Guideline towards a directly applicable document with a high market value as soon as it will become a binding EU regulation.

In parallel to this answer to the ERGEG public consultation, in order to anticipate the application of the proposed art.2.2 of the Draft Guideline, ENTSO-E publishes on its transparency platform entsoe.net a first set of detailed definitions (working document for information) that might be useful to enhance Transparency. These definitions give a first approach of a possible detailed view of ENTSO-E definitions on most data required for publication by ERGEG.

GENERAL COMMENTS

During the first ERGEG-ENTSO-E joint workshop, ENTSO-E presented its key principles on Transparency. Below, ENTSO-E comments these principles compared to the proposed articles of the draft guideline.

1. *The legal recognition of a central European Transparency platform plus local websites*. When reading art.3.8 literally, local websites seem to be limited to a simple duplication of the information available on the central Transparency platform. The text should be modified to allow a role for local sites to enhance local innovations and local specific publications.
2. *A flexible guideline adaptable to new market needs* (art.2.2), by allowing the clarification of definitions by the "party running the central information platform", of course through a transparent process by consultation of stakeholders and after opinion of ACER. This art.2.2 could even be enlarged to a possibility of introducing new data to be published upon agreement of stakeholders. This article could also be improved by replacing "party running the central information platform" by ENTSO-E as it is giving to ENTSO-E this role.
3. *A legal basis to allow publication of information not owned by TSOs*: This principle appears in several articles of the guideline reinforcing obligations on owners of data. ENTSO-E proposes to clarify responsibilities by introducing some legal definitions of Primary Owner of the Data ("the entity that is able to generate the data that is the only responsible for the quality of the data") and of Data Provider ("the entity in charge of sending the data to ENTSO-E"), by developing roles and responsibilities of these parties and by indicating data per data to be published who are these two entities. In case of local difficulties to get

information from a large number of primary owners, TSOs should also be able to propose an architecture of information flows to their NRA. ENTSO-E also considers that the Guidelines should clearly define the tasks of ENTSO-E with respect to the publication of the data, as well as limit liability of ENTSO –E related to performance of its tasks.

4. The EU-wide definitions and timeframes for publication should be crystal clear: It appears some ambiguous definitions and timeframes within the requested data. Even if definitions cannot be very technical and detailed in the Guideline, their scope needs to be right so that ENTSO-E can appropriately clarify them later where needed. ENTSO-E believes that it is necessary to correct this situation and proposes further discussion with ERGEG to allow as soon as possible a quick European wide application of the Guideline.
5. Publication of all data that add value to the market: ENTSO-E considers that some requested data to be published do not add a high value to the market (e.g. weekly, monthly and yearly load forecast and output of small power plants) and that some other data (as unavailability of power plants/consumption units) contain information that could be provided to the market in a simpler way, for instance, by giving aggregated information filtered by technology.
6. Flexible timetable for implementing the guideline, depending on market maturity : two reasons justify a flexible timetable for the application of the guideline, first the initial transparency levels differ in different Member-States and second, for practical reasons, it is impossible for all TSOs to deliver immediately all the requested information mentioned in this guideline. Practically, once the guideline will be adopted, some definitions might need to be precised, it will be necessary to write detailed implementation guides and to adapt information systems¹, especially entsoe.net, that can take a long time.. To ease the process, it is suggested to give to ENTSO-E a prescriptive technical function².
7. Provisions to cover TSOs costs induced by guideline. The application of this Guideline will induce investment costs to develop adapted information systems and operation costs in terms of staff, telecommunication, maintenance etc.. ENTSO-E considers that the legitimate actions of its members should be recognized by a clear article indicating that recovery of all the costs induced by this Guideline shall be ensured in the TSO regulatory frameworks. This principle is particularly important in countries where TSOs are submitted to an incentive regulation with a target of performance defined before the writing of this Guideline.
8. A principle of possible restrictions to publication. This principle is important for specific situations that cannot be ignored in a EU binding regulation,
 - In some countries, some elements of the HV Transmission Network are considered “Critical Infrastructures”. Therefore, an open publication of names and location of these elements and ex-ante and real time dates of their unavailability should be avoided due to national security reasons³,
 - In many countries, metal thefts are developing. Electrical lines are naturally protected because of their risks for human health. This protection will disappear, if names and location of unavailable lines become public,
 - As mentioned in art.16 of the 2009/072 Directive, the publication of information by TSOs must preserve the confidentiality of sensible commercial information. This aspect is fundamental as in some situations, revealing detailed information on small generators in a market dominated by one or several companies might threaten a fair competition field.

¹ European call for tenders are likely to be necessary and they take around 6 months.

² Because of the complexity of the information flows to be developed a delay of at least 2 years is required.

³ In this respect, delayed ex-post detailed publication could be a fair commitment between market transparency and national security.

9. Application of the guideline to non-EU Member States: non-EU Member States, such as Norway, Switzerland, Serbia, etc., are electrical systems participating in the European market and should be treated in the transparency guideline in an equal manner.

Compared to the Regional Regulatory Reports on Transparency, the proposed draft Guideline contains some new items, which are commented below:

10. Publication at H+1 after real time instead of H+2: ENTSO-E agrees with the principle of publication of information in H+1 if the information is automatically available through information systems. But we underline that if there is a need of a human intervention or verification or a cascade of several information systems, H+2 is already a very tight deadline.
11. Annual in-depth reports on structural congestions plus a monthly report on congestions of M-1: First, ENTSO-e would like to comment that the term structural congestion is hard to define and that "structural" should may be removed in the guidelines. Second, structural congestions are a major restriction to a liquid Internal Electricity Market, and that is why ENTSO-E believes that an annual report would have a high market value. Apart from hydro-dominated systems (e.g. Norway), structural congestions do not change from month to month and therefore a monthly report would bring little added value. That is why ENTSO-E suggests to replace the proposal of a monthly report by updates of the annual report if structural congestions evolve.
12. Request to ENTSO-E to publish an harmonized method for forecasting load: ENTSO-E believes that any harmonization that contributes to an efficient Internal Electricity Market is welcomed but do not understand why ERGEG included this demand while it never appeared before in any report or any ERGEG working document. ENTSO-E suggests to open discussions on the question first to discuss present national methods with the aim of defining all local specificities (for instance what is the weight of electrical heating, weight of industries compared to domestic customers,...), then to explore the costs and the benefits of an EU-harmonization of load forecasting methods. Finally, ENTSO-E underlines that this is a guideline about what data should be disclosed to the market. It is not an appropriate document to place obligations on TSO regarding which methods are used in producing such data. There are other processes aiming at such harmonisation.
13. Publication of outputs of generations units equal or greater than 10 MW, updated as changes occur at least every 15 minutes. ENTSO-E proposes that this demand will be removed:
- It is very complex as the number of units equal or greater than 10 MW is roughly estimated to be well over 2500 in ENTSO-E area
 - A sizeable part of these units – especially from 10 MW to 50 MW – is not metered in real time because of the cost and complexity of the equipments and IT system that would be required,
 - Even if all units were metered in real time, the amount of information becomes huge (over 2500 outputs updated as changes occur, i.e. every 10 seconds for some SCADA systems, representing over 20 million values per day).
 - It is contradictory with the time schedule of H+1 requested for load publication which is not a very different publication and with the usual threshold of 100 MW mentioned in all the other requested publications,

Finally and most importantly, value of such huge data for the market is very low. This is why, the usefulness of an aggregated and partially estimated data as proposed in art.4.3.2.9 seems quite more appropriate

14. Regarding article 4.2.2.5, an extensive simplification has been made compared to requirements set in ERI Reports:

- ✓ Newly proposed time 07h CET is hard to achieve and not justifiable for capacity forecasts regarding more than day ahead from ENTSO-E perspective. The capacity forecasts critically depend on quantity and mainly quality of the input data (topology changes, generation, intermittent generation, load pattern etc.). There are also planning and operational procedures which have to be taken into account. Proposed rolling based forecasts would only lead to a daily copy paste of the previous day values.
- ✓ Under this article, the types and the volumes of publications are very diverse, ENTSO-E suggests that this article should be developed based for instance on inputs from the ERI reports and from the draft ENTSO-E definitions document.

Finally, ENTSO-E mentions that it is hardly possible to publish peak and off-peak NTC values and supports one value per Market Time Unit for each of the requested capacity to be published.

ANSWERS TO THE QUESTIONS

ENTSO-E would like to comment on the different questions of the consultation document,

a) GENERAL ISSUES

Question 1: ENTSO-E already mentioned that the Guideline should include articles dealing with transparency cost coverage, with flexibility of the schedule of application and with a possibility to restrict publication. To these major points, it could be added the following items:

- ✓ A general definition of what is a Fundamental Data is needed,
- ✓ A general principle of update of published information when more accurate (i.e. replacement of estimated values by measured values) should be included,
- ✓ The way the guideline will be applied in non-EU Member States such as Norway, Switzerland, Serbia,... should be mentioned.

Question 2 was answered in ENTSO-E General Comment 6 *"Flexible timetable for implementing the guideline, depending on market maturity"*.

Question 3 & 4 are answered in ENTSO-E General Comment 3 *"A legal basis to allow publication of information not owned by TSOs"*

ENTSO-E has no specific comments on questions 5 and 6.

On question 7: ENTSO-E recalls the need of cost coverage of any transparency cost induced by this guideline.

b) LOAD

On question 8: ENTSO-E does not see the need for additional publication regarding load. But, as mentioned in answer to the question 1, ENTSO-E is in favour of updates of published data as soon as more precise measurement of these data is available.

On question 9: ENTSO-E thinks that an anonymous publication of the information on unavailabilities of consumption units as proposed in the draft guideline is sufficient for the transparency needs. A more detailed information could be considered if it is proven to be valuable for the electricity market, without however damaging the downstream markets.

c) TRANSMISSION AND INTERCONNECTORS

Question 10 is a sensitive issue for TSOs, it can be seen from two different perspectives. Firstly, if the maintenance schedules (outages) are already reflected in capacity forecasts this kind of information is redundant. Second and more important issue regarding the publication of the maintenance schedules is the national security aspect. In some EU countries open publication of this information regarding critical infrastructures it is not considered neither ex-ante nor real time due to national security reasons to prevent possible terrorist actions. Moreover, in many countries the electric systems are facing the threat of cable thieves as this kind of information is being openly published as ex-ante and real time information when particular HV/EHV assets are out of operation (without voltage). The recommended publication for this critical data is an ex-post detailed one.

Question 11: From ENTSO-E point of view, it seems reasonable for simplicity of application of this Guideline to keep a simple value of 100 MW rather than complicating the demand by more sophisticated calculations.

Question 12 is answered above in the paragraph "*On the new requested publications*" in point "*Annual in-depth reports on structural congestions plus a monthly report on congestions of M-1*".

d) GENERATION

Question 13: By definition, unavailability relating to a given unit is more precise than information relating to a given plant. Moreover, it seems obvious that the providers of these data (generators) are more used, for their internal use, to deal with data per unit than with data per plant. That is why a publication relating to units seems more natural. At last, the use of unavailability data per unit jointly with a reasonable threshold will avoid the very hardly manageable question of non-availabilities of very small units such as wind generators.

Question 14 is answered above in the paragraph "*On the new requested publications*" in point "*Publication of outputs of generations units of more than 10 MW, updated as changes occur at least every 15 minutes*".

Question 15: Fuel requirements is today commonly used for almost all technical and statistical publication. ENTSO-E does not identify any reason to change this matter of fact. The threshold should be linked to fuel type according to ENTSO-E.

e) BALANCING

Question 16: ENTSO-E underlines the fact that this Draft Guideline does not include any closed list of reserves but rather opens the issue regarding publication of the balancing data. ENTSO-E would prefer that the Guideline is limited to the publication that was described in the past Regulatory Reports (except for cross-border balancing where information was not yet described).

On question 17: ENTSO-E believes that transparency on Fundamental Data as defined in this document and transparency on Market Prices are two separated items and should not be treated by the same EU legal text. Nevertheless, in case of any evolution of the legislation getting to more Transparency on Market Prices at the EU level, ENTSO-E will offer its pan-European Transparency Platform entsoe.net as a channel of publication.

SPECIFIC COMMENTS ON SOME PROPOSED DATA

ENTSO-E underlines the need of precise definitions and mentions that, when possible, the precise definitions should be introduced in the Guideline to allow a quick application of the Guideline. As it was the case in the past regional regulatory reports, each time a data has to be published some detailed characteristics should be described with the lowest possible degree of interpretation:

- ✓ **Denomination**: it is the name of the data to be published.
- ✓ **Definition**: the description of the data.
- ✓ **Unit/Timeframe**: the physical unit to be used (MW or MWh for instance) and the timeframe of publication.
- ✓ **Primary owner of the data**: the entity that is able to generate the data. It is the only responsible for the quality of the data.

- ✓ **Data provider:** the entity in charge of sending the data to ENTSO-E,
- ✓ **Technical availability** specifies if there is any technical obstacle to the supply of the data.
- ✓ **Update if any is possible:** some data might be measured by several means or recalculated during the process following the operation. In any case, the primary owners of data and data providers have to supply to ENTSO-E their best estimate of the data.
- ✓ **Date of publication by ENTSO-E** indicates when the information must be delivered to the market on entsoe.net.

As a general comment, ENTSO-E would like to mention that the reference for publication of data should not be specified as hour, quarter of an hour or as balancing mechanism time unit but per Market Time Unit using the definition that is proposed by the Draft Guideline.

As indicated in the appendix of this answer, ENTSO-E has already performed a review of all data mentioned in past Regulatory Reports on Transparency. On the new proposed publication by this Guideline, ENTSO-E is ready to provide new definitions, upon ERGEG's demand.

In this part of its answer, ENTSO-E provides its main concerns regarding the present proposed definitions, especially for new data proposed to publication.

a) GENERAL ISSUES

- ✓ The definition of bidding area should be more precise to treat the case where a bidding area comprises more than one State, ENTSO-E suggests to add to the definition of a Bidding Area the following sentence "Basically, all information is supplied per bidding area except if a bidding area is wider than one State. In that case, if possible, the information has also to be supplied for each State, part of the bidding area"
- ✓ The definition of a Generation Unit should include the word "isolated" to avoid any misunderstanding. In the rest of the document the words "power plant" are used, if they have a different meaning than "generation units", ENTSO-E suggests to add a definition⁴.
- ✓ The definition of Net Transfer Capacity could be precised by the following description, "NTC corresponds to the maximum exchange between two areas compatible with security standards applicable in both areas and taking into account the technical uncertainties on future network conditions."
- ✓ ENTSO-E agrees with all principles of art. 3.6.3 about the access to the central Transparency platform but underlines that registering should be allowed to help ENTSO-E in establishing relations with all the users of the website with the aim of improving its services to users.
- ✓ ENTSO-E suggests to delete article 3.7 because its is redundant with article 3.2

b) LOAD

- ✓ ENTSO-E would like to make clear that the definition of Total load should include the word "gross" to avoid any misunderstanding. It should also be stated that total load will include losses on the networks. Moreover, as it would not be cost-effective to have real-time measurements for small-scale generation units, it should be stated that total gross load will always be partly estimated. The total gross load should also be published per market time unit.
- ✓ Art. 4.1.3.1 should deal with "total gross load" instead of "vertical load" to be consistent with the rest of the load part.

⁴ For instance, «Power plant is a group of generation units on the same site which are operationally linked to each other»

- ✓ If publication of forecasts (art. 4.1.3.3, 4.1.3.4, 4.1.3.5) is to be made compulsory, then peak and off-peak should be changed to maximum and minimum values per Market Time Unit. Regarding the minimum values, it must be highlighted that most TSOs are not used to deal with them. In fact, most of the time system studies are usually based on the situations where the system is stressed that it to say, usually, when the load is maximum. That is why most TSOs are not used to deal with the technical availability of minimum values: it is a domain that mainly remains to be investigated for forecast longer than day-ahead."
- ✓ As mentioned in the answer to the question 9, ENTSO-E does not see the value for the market of the name of consumption units (art.4.1.3.7, 4.1.3.8).

c) TRANSMISSION AND INTERCONNECTORS

Generally speaking the part regarding transmission and interconnectors needs further harmonization of terminology. Due to highly specific topics it is of utmost importance to have precise wording in order to avoid misinterpretation. This relates mainly to terms linked to cross border capacity. Among defined and well know terms like ATC and NTC, other used expressions like "available interconnection capacity", "interconnector capacity", "cross border transfer capacity", "PTDF" etc. miss definitions.

Furthermore a clear preference is given to ATC/NTC part, while the part regarding flow based is rather small and underestimated. As there has not been flow based capacity calculation and allocation implemented in Europe this part should be finalized accordingly later on.

- ✓ In art. 4.2.1, there is lack of consistency in terms of usage of defined threshold of 100 MW in frame of 4.2 part. The information regarding expansion and dismantling projects in national transmission grids should be submitted when the estimated impact on the interconnection capacity is over 100 MW.
- ✓ In art. 4.2.2.1, the date of publication seems to be very early. For instance, following the present proposal, some TSOs should deliver the information on 5th November for any yearly auction planned in December. For ENTSO-E an information to the market at a later date is sufficient: one week before yearly capacity auction, at the latest 15th calendar day of the month before the year which data refers to.
- ✓ In all the items of part 4.2.2, the "impact on capacity" should be more precised by defining what is behind the general term "capacity".
- ✓ In all items of part 4.2.2. and especially for 4.2.2.2. : in the case of an outage that has no consequence on the NTC, there should not be any obligation of publication as this outage has no impact on the market. Only transmission outages that influence NTC should be published as they are market relevant.
- ✓ In article 4.2.2.6 it is unclear what is meant by "after each change"? According to ENTSO-E, it should be clarified to exclude changes in usage of ATC but to take into account the changes of operation input data on which the intraday capacities are assessed. If so, a threshold for defining a change has to be given.
- ✓ In all items of the part 4.2.3 regarding flow based allocation, ENTSO-E expects that it will be possible through this guideline to publish all relevant market information; for instance, it is expected that information on critical branches will remain anonymous.

d) GENERATION

ENTSO-E would like to emphasise that some of the data outlined in the part 4.3 on generation may be generated by the Transmission System Operator and not only the generators themselves. As an example, outputs of generating units and ex-ante forecast of generation of RES provided by TSOs give global information and

therefore with higher added-value, instead of the partial information that generators could give of their units. As a consequence, the text should let some room for information provided by the TSOs and not only by generators.

Another remark that is valuable for the whole part 4.3 on generation is that ENTSO-E agrees with the threshold of 100 MW for the publication of information. On the other hand, ENTSO-E mentions that, for individual publication, no other information but the bidding area, production type and installed/available capacity is valuable for the market. Moreover the influence on system security of such a detailed publication should also be carefully examined.

Finally, it is of the utmost importance that no direct reporting of information from generators to the transparency platform is considered in these Guidelines even if the data provider are generators, since the report organized locally by TSOs assures a controlled publication and coherency in data. The number of flows resulting from direct flows from generators would also be unmanageable for the platform. Moreover, it might damage the well working information flows that exist today, through some power exchanges for instance.

- ✓ ENTSO-E notices that, the words “without undue delay” are mentioned twice in the article 4.3.1 but the definition is unclear. ENTSO-E would like to alert about the possible abuse that could be made with this wording. The wordings “H+1” for information that are sent in an automated way and “H+2” for information requiring a human intervention or a cascade of IT systems are advisable.
- ✓ In articles 4.3.2.1, 4.3.2.2 and 4.3.2.3, an annual information has to be declared. As installed and available capacities vary through year, it should be clearly stated, to what date the declared installed capacity should be referring to or what should be the update obligations.
- ✓ Regarding articles 4.3.2.4, ENTSO-E remarks that the proposal that is made here is that all generators should provide information about non-availabilities regarding different generation units, with different start and stop dates. The publication resulting from this proposal will be a disorderly list of specific events, not directly usable by market participants. This information will have to be treated by market participants before having any market value. ENTSO-E emphasizes the fact that the information that is really awaited by the market is availability of generation units and not unavailability. Thus, it should be proposed to publish, the availability of units over 100 MW instead of unavailability, that is to say the data described in art.4.3.2.3 with some update obligations. The result could be directly usable and presented in an easily understandable format. ENTSO-E also remarks that the relevant information for the market and for understanding of the price formation is still a simpler information which is aggregated availability of units over 100 MW per generation type.
- ✓ Additionally it is worth to think over if data in points 4.3.2.3. and 4.3.2.4. should be both published, because the units availability (4.3.2.3.) results from the installed unit capacity (4.3.2.2.) and planned outages (4.3.2.4.).
- ✓ Article 4.3.2.5 mentions a publication “immediately after the outage”: of course, ENTSO-E understands the need of a quick information of the market but the notion “immediately after the outage” should be precised in coherence with other requested publications.

e) **BALANCING**

- ✓ Transparency on balancing is a difficult issue as there is no harmonization of balancing mechanisms within Europe. That is why ENTSO-E appreciates the fact that this draft guideline does not define any closed list of reserves but rather opens the possibility for a publication at the EU level of the same type of information basically volume and price for any type of existing reserve. For the same reason, ENTSO-E, would prefer that the Guideline is limited to the publication of data that were described in the past Regulatory Reports (except for cross-border balancing where information were not yet described).

- ✓ There should not be a specific mention of “generators and load” (paragraph 4.4.1.2) but rather a general reference to a more general notion of Balance Service Provider or the simple notion of Suppliers of balancing services.
- ✓ On the new demand of publication of 4.4.1.11, ENTSO-E would like to consider it after reactions of concerned stakeholders as at first glance for instance “generation technology” seems to be confidential information.
- ✓ Paragraph 4.4.1.4 requests an ex-post information after the operating hour, as balancing markets designs differ all over Europe, the delay should be adapted to local solutions.
- ✓ ENTSO-E would like to underline that the paragraphs about cross-border balancing should be preceded by the words “if applicable” as they do not precisely cover models with Common Merit Order cooperation, like the Nordic but only bilateral exchange of bids.

f) ANNEX ON GENERATION TYPES

The proposed list of types of power plants is not exhaustive: for instance, for thermal power plants, the fuels “peat” is not mentioned and for hydro power plants, the reservoir and tide types are missing. ENTSO-E suggests that this list of types could also be improved following the process proposed in article 2.2.

APPENDIX DETAILED DEFINITIONS OF ENTSO-E

This appendix is a lookup table aiming at indicating how ENTSO-E could detail the definitions of the data that ERGEG proposes for publication. First column indicates the paragraph of ERGEG draft guideline and second column refers to the paragraph of the ENTSO-E draft document on definitions available on entsoe.net.

Reference of ERGEG Draft Guideline	Reference of ENTSO-E
Load	
4.1.3.1	1.1
4.1.3.2	1.2
4.1.3.3	1.5
4.1.3.4	1.6
4.1.3.5	1.7
4.1.3.6	1.8
4.1.3.7	1.3
4.1.3.8	1.4
4.1.4	Precise definition to be developed
Transmission and Interconnectors	
4.2.1	2.1
4.2.2.1	2.2
4.2.2.2	2.8
4.2.2.3	Precise definition to be developed
4.2.2.4	Precise definition to be developed
4.2.2.5	2.3, 2.4, 2.5, 2.6
4.2.2.6	2.7
4.2.2.7	Precise definition to be developed
4.2.3.1	5.1
4.2.3.2	5.2
4.2.4.1	2.12
4.2.4.2	2.13
4.2.4.3	2.14
4.2.4.4	Precise definition to be developed
4.2.4.5	Precise definition to be developed
4.2.4.6	2.16
4.2.4.7	2.10
Generation	
4.3.2.1	3.1
4.3.2.2	3.1
4.3.2.3	Not concerned
4.3.2.4	3.2
4.3.2.5	3.6
4.3.2.6	3.3
4.3.2.7	3.4
4.3.2.8	3.7
4.3.2.9	3.7
4.3.2.10	3.5
4.3.2.11	3.5
Balancing	
4.4.1.1	Not concerned
4.4.1.2	Not concerned
4.4.1.3	4.1
4.4.1.4	4.4
4.4.1.5	4.2
4.4.1.6	4.2
4.4.1.7	Precise definition to be developed
4.4.1.8	4.3
4.4.1.9	4.4
4.4.1.10	4.5
4.4.1.11	Precise definition to be developed
4.4.2.1	Precise definition to be developed
4.4.2.2	Precise definition to be developed
4.4.2.3	Precise definition to be developed

ENTSO-E exercise performed during the common work with ERGEG was based on list of data that were proposed for publication in the past Regional Regulatory Reports, that is why in some cases there is no correspondence between ERGEG proposal and ENTSO-E document. Of course, in the future, ENTSO-E will develop any necessary definitions, if needed.