

**Comments of CEZ, a. s.
ERGEG's Public Consultation Paper
on Draft Comitology Guidelines on
Fundamental Electricity Data Transparency**

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I. Introduction

CEZ, a. s. (hereinafter referred to as “CEZ”) welcomes the opportunity given by ERGEG to all interested parties to comment the text containing Draft Comitology Guidelines on Fundamental Electricity Data Transparency within the Public Consultation process.

In this paper CEZ has expressed several comments to the problem.

II. Specific comments of CEZ

General comments

Question 1 to 6: Existing degree of specification is satisfactory, further details or additional data are not necessary.

Question 7: The increased costs can hardly bring awaited benefits.

Load issues

Question 8: To our opinion, not all data will be used in practice.

Question 9: We do not recommend to enhance the range of information.

Transmission and interconnectors

Question 10: More detailed specification can hardly bring added value for the users, it would be costly and risk of misuse exists

Question 11: 100 MW absolute limit seems to be satisfactory.

Question 12: No answer.

Generation

Question 13: Yes, the unavailability data should relate to the specific unit although this information has different importance for different stakeholders.

Question 14: Yes, we consider the 10 MW threshold for generation units appropriate.

Question 15: Its hard to specify, see answers to the questions 13 and 14.

Balancing and wholesale data

Question 16: We consider the proposed list of data items sufficient.

Question 17: Wholesale market data need more profound discussion as to the extent of publication and transparency.