



GEODE COMMENTS ON ERGEG PUBLIC CONSULTATION ON DRAFT COMITOLGY GUIDELINES ON FUNDAMENTAL ELECTRICITY DATA TRANSPARENCY

GEODE, the European association representing the interest of energy distribution companies welcomes **ERGEG draft comitology guidelines on fundamental electricity data transparency**.

I.- General Comments.-

As general comment **GEODE** would like to point out that most of the obligations contained in ERGEG paper primarily affect TSOs, and are unproblematic in GEODE's view, as association of the European distributors of electricity and gas.

GEODE considers that transparency of information is essential for the effective functioning of the market, to provide a "level playing field" for all market participants. A European single market is first of all a market where, at the level of transmission a transnational flow of energy on equal transparent terms is open to all players without borders.

According to ERGEG's paper, generators and consumers must deliver the required data to the TSOs. Therefore, it must be clearly defined which consumption and generation units are therein included, which is not clear in the respective definitions (under 2.5.3 and 2.5.4) contained at ERGEG paper. No threshold values are provided either.

It does not become any clearer when ERGEG refers to the EU legislation, Directive 2009/72/EC and Regulation (EC) No 713/2009 and No. 714/2009. Indeed, pursuant to Section 5 of the Annex to Regulation (EC) No 714/2009, the obligations to publish information affect only TSOs. However, according to the wording of ERGEG paper, its scope will cover all market participants. This issue requires further analysis.

II.- Comments on ERGEG consultation paper on concrete issues.-

Section 4.1 Load:

Pursuant to Section 4.1.1 of ERGEG's paper, consumption units and DSOs shall provide TSOs with all the relevant data that are required so that the TSOs can fulfil their obligations. In **GEODE's** view, this obligation is too vague.

There are no objections in relation to the remaining obligations.

Section 4.3 Generation:



Pursuant to **Section 4.3.1** of ERGEG's paper, generators have to submit all relevant generation data specified in the Guidelines to the TSOs of the control area within which they are located without undue delay. The relevant generation data are defined under Section 4.3.2.

Some reporting obligations affect only generation units with an installed capacity exceeding 100 MW (Sections 4.3.2.2 to 4.3.2.6). These are quite unproblematic.

However, pursuant to Section **4.3.2.8**, producers with an installed generation capacity equal to or greater than 10 MW have to update the information as changes occur (at least every 15 minutes). This includes many relatively small generation units, the operators of which are not able to meet such a real-time reporting obligation.

For such relatively small plants the effort and expenses for the collection of information are not commensurate with the transparency improvement: operators will have to maintain permanently an expensive infrastructure in order to fulfil the obligation. An unavailability of such facility, however, does not affect either the market prices or the grid stability.

Therefore, **GEODE** considers that this obligation should either be removed without replacement or the threshold should be elevated to a considerable extent.

ERGEG itself calls it into question whether this provision can be considered as appropriate (cf. question 14 of the consultation).

As regards **Section 4.3.2.1**, requires ex-ante information on the total sum of generation capacity (MW) installed for all existing generation units larger than 1 MW installed capacity. This does not constitute a problem either.

Sections 4.3.2.7 and 4.3.2.10 through to **4.3.2.11** provide for reporting obligations in relation to hydropower, wind and solar power. From the context, it could be assumed that these obligations affect only TSOs.

However, **Section 4.3.1** seems also to provide for a co-operation/information obligation for individual generators. No threshold would be provided in this regard. If such a co-operation/information obligation were intended for the individual generators, an appropriate threshold value should be stipulated; everything else would be disproportional.

Section 4.3.2.9 requires that information is provided on an hourly basis per generation type (thermal power plants, hydropower plants, renewable energy plants). It is not clear in this context either if no reporting obligations applied for small generators. A clarification in this regard would be desirable.



Finally, **GEODE** expresses its wiliness to participate in the process to develop Comitology Guidelines on Fundamental Electricity Data Transparency.

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