European Regulators' Group for Electricity and Gas
Rue le Titien 28
1000 Brussels
Belgium

6 November 2009

PLATTS RESPONSE TO CONSULTATION ON THE EUROPEAN ENERGY REGULATORS 2010 WORK PROGRAMME

Attachments: Platts' Germany market transparency tracker

Dear Sir,

Platts, the energy and commodities information division of The McGraw-Hill Companies, is pleased to have the opportunity to contribute to the consultation on the European Energy Regulators 2010 Work Programme (C09-WPDC-18-03). Enclosed is Platts' response to the consultation, issued by ERGEG on 9 September 2009. It includes an overview and comments on specific focus areas.

In its response, Platts also outlines in which areas it is looking to actively participate through consultations and hearings.

Platts has long advocated the goal of increased price transparency in natural gas and electricity markets both in the US and in Europe. In recent years Platts has implemented a number of editorial policies that are designed to enhance the reliability of voluntary price reporting and to increase information available to the marketplace through its price surveys. Platts continues to examine ways to provide still more transparency in its price reporting.

In addition, Platts has long highlighted the issue of transparency of market data and in this regard, launched an EU power market transparency tracker series in summer 2008. The trackers aim to compare compliance with the Congestion Management Guidelines (CMG) and ERGEG's Guidelines for Good Practice on Information Management and Transparency in Electricity Markets (GGP) within the different Regional Initiatives and ultimately between regions.

Platts appreciates the deliberation with which ERGEG is approaching the identified seven focus areas for 2010.

If you have any questions regarding this submission, please do not hesitate to contact Vera Blei, Platts' editorial director, European power and gas, on +44 (0)20 7176 6119 or email vera_blei@platts.com.

Best regards

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Vice President, News & Pricing   Global Editorial Director, Power

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About Platts

Platts, a division of The McGraw-Hill Companies, is a leading global provider of energy and metals information. With a century of business experience, Platts serves customers across more than 150 countries. From 15 major offices worldwide, Platts serves the oil, natural gas, electricity, nuclear power, coal, emissions, petrochemical and metals markets.

Platts' real-time news, pricing, analytical services, and conferences help markets operate with transparency and efficiency. Traders, risk managers, analysts, and industry executives depend upon Platts to help them make better trading and investment decisions.

Founded in 1888, The McGraw-Hill Companies (NYSE: MHP) is a leading global information services provider meeting worldwide needs in the financial services, education and business information markets through leading brands such as Standard & Poor's, McGraw-Hill Education and J.D. Power and Associates.

The Corporation has more than 280 offices in 40 countries. Sales in 2008 were $6.4 billion. Additional information is available at **www.mcgraw-hill.com**.

Overview

A starting point for the present consultation is a year of transition ahead for the European Energy Regulators in preparation for the new Agency for the Cooperation of Energy Regulators (ACER). As demand on regulators from stakeholders and the European Commission is increasing, the European Energy Regulators have chosen a more focused approach around seven key areas for 2010. The European Energy Regulators have published an overview of the seven priorities and a brief explanation of the documents they intend to deliver.

Platts offers an independent information service on the energy and related markets on a subscription basis, with the goal of helping its customers make better business decisions. Information published by Platts includes benchmark prices (assessments and indices), market commentaries, market analysis, exchange prices, information on market fundamentals such as production, consumption, and scheduled and unscheduled outages, weather data and market-related news stories. Price and market information is available in real-time, electronic format, daily, weekly, fortnightly and monthly publications, and in database form. Platts' price reporting follows detailed, public methodologies specific to each market covered, available at: http://www.platts.com/MethodologyAndReferencesHome.aspx.

Various Platts publications also publish "trackers" of planned and existing energy infrastructure projects in Europe and beyond. In summer 2008 Platts launched an EU power market transparency tracker series. The trackers aim to compare compliance with the Congestion Management Guidelines (CMG) and ERGEG's Guidelines for

Good Practice on Information Management and Transparency in Electricity Markets (GGP) within the different Regional Initiatives and ultimately between regions. The first tracker focused on southwest Europe, defined by the EC and ERGEG's 2006 regional power initiatives as France, Spain and Portugal (*Platts EU Energy*, Issue 189, August 8, 2008). The second tracker focused on Germany, which is a key market for ERGEG's central east, central south, central west and northern electricity regional power initiatives (*Platts EU Energy*, Issue 216, September 25, 2009). Platts has appended its Germany tracker to these comments to enable European Energy Regulators to see the depth of information available.

Responses to specific documents

3.1.3 Regulatory aspects of electricity wholesale market issues
#9 Input to the Framework Guideline on transparency in electricity (EWG)

The Sector Inquiry found that there was a failure in European electricity (and natural gas) markets that was mainly due to structural problems, *i.e.*, continued dominance of a few large market players, vertical foreclosure and a lack of transparency of fundamental supply and demand data.

Platts believes that many of those structural problems are still impeding the development of the European electricity (and natural gas) markets. There is an imbalance between buyers and sellers. National markets and even the European market tend to be dominated by a handful of major players. There is a lack of market integration between member states and no common market design. Moreover, there is a varying degree of transparency in fundamental supply and demand data. Measures that address these issues can be expected to go a long way toward creating more liquid wholesale electricity (and natural gas) markets that generate greater consumer confidence and more competitive prices. Platts believes that elements of the Third Energy Package will help lay the groundwork needed for these markets to flourish.

Fundamental supply and demand market data is vital to a full understanding of electricity prices and is a key component of market transparency. Platts welcomes, therefore, that national regulatory authorities and the European Commission are working toward improving transparency of both types of information. In US gas and electricity markets, the Federal Energy Regulatory Commission is taking the same approach, determining that physical flow data is critical to understanding market functioning.

Market participants need a variety of market fundamental data to develop an informed market position. These fundamental supply and demand categories not only influence trade strategy, but also dictate asset portfolio movements, production decisions, geographic focus, asset and infrastructure development requirements, and long-term market strategy. Indicators such as fuel consumption, production, plant efficiencies, segmented actual and forecast demand, available pipeline capacities, actual and forecast gas flows, fuel reserves, and hourly emissions are all highly conducive to competitive and accessible markets. More transparent and widely available fundamental market data enables participants to compete more equally.

In the European electricity market, Platts offers a comprehensive analytical database tool called European Powervision. It includes a database of Platts' assessments, exchange prices and volumes, cross-border capacity availabilities and prices, production data, flow data and reservoir levels. It also offers a database of existing and planned infrastructure assets by owner, capacity, generation type, etc. Platts is one of the suppliers of data to the European Commission's Energy Market Observatory System. Through its development of Powervision, Platts has gained experience and insight into market needs for fundamental data.

Platts will be seeking to participate in public hearings and workshops pertaining to this document.

3.2.2 Regulatory aspects of wholesale energy markets
#27 ERGEG Response on market supervision issues (FIS WG)

Establishing a definition of Market Abuse (*i.e*., insider trading, market manipulation) is a critical foundation for energy trading supervision and transparency rules. Requirements for market fundamental data and transaction reporting will impact market behaviour, and ensuring that requirements are appropriate will be critical to attract new market participants into the European wholesale energy markets, which in turn will be critical to enhance liquidity.

Platts will be seeking to participate in public hearings and workshops pertaining to this document.

#28 ERGEG Response to transparency in energy trading (FIS WG)

Platts has considerable experience in assessing prices and analysing market development in a number of commodities, including oil, electricity, natural gas, coal, emissions, metals, petrochemicals and shipping in Europe, the US and Asia. No two markets are the same. The degree of liquidity and transparency varies greatly from market to market and the solutions that have been found to improve the market's functioning are also quite diverse. In some markets there is a higher proportion of exchange or other online trade; in others trade is mostly done over the counter either bilaterally or using a broker. Some markets see hundreds, even thousands of fixed-price deals a day; others see only a handful a week. In some markets the details of trades that form part of the price-setting process are known to all, up to and including counterparties. In other markets trades are mostly private and confidential, often with an index-related price, and only the price and volume may be known.

Transparency rules will play a vital role in market development. However, the benefits and disadvantages of enforced trade reporting as an additional measure to improve market functioning must be carefully considered. There is little doubt that opaque markets are generally inefficient and greater transparency will generally lead to greater liquidity and market integrity. At the same time, new market entrants may be dissuaded by the prospect of having to reveal all their trades to national regulatory authorities and would almost certainly be deterred by the prospect of having all their trades made public. Therefore, it is important to strike the right balance such that all

market participants have access to the information they need to enable that market to function efficiently, while at the same time recognizing that companies will desire from a competitive standpoint to keep some of their activities confidential.

Platts is highly experienced in handling confidential and/or sensitive market data in various commodity markets. Platts' approach to using this data in its reporting relies on basic principles – independence, impartiality, precision and integrity – but varies by market in recognition of the specific features of each market.

Platts will be seeking to participate in public hearings and workshops pertaining to this document.

#29 CEER Response on interdependencies with other markets (FIS WG)

Platts reports on the oil, natural gas, electricity, nuclear power, coal, emissions, petrochemical and metals markets. We observe and analyse interdependencies between the electricity and gas markets and other energy markets on a daily basis.

Crude and oil products, coal, carbon and to a certain extent natural gas are global markets and their influence on pricing of electricity and gas in Europe goes well beyond the regional fundamentals prevailing in European regions. Platts is well positioned to report on those regional and international interdependencies.

Platts will be seeking to participate in public hearings and workshops pertaining to this document.

#31 Status Review on the ERGEG Regional Initiatives (RIG)

Platts, through its daily market reports, analysis and regular tracking of market fundamentals and transparency, is actively monitoring convergence of all European power and gas market regions. In fact, in the case of gas markets that monitoring of convergence goes beyond the boundaries of Europe and includes the emerging global market for liquefied natural gas (LNG).

In addition to the daily market reports, Platts launched an EU power market transparency tracker series in 2008. The trackers aim to compare compliance with the Congestion Management Guidelines (CMG) and ERGEG's Guidelines for Good Practice on Information Management and Transparency in Electricity Markets (GGP) within the different Regional Initiatives and ultimately between regions. The first tracker focused on southwest Europe, defined by the EC and ERGEG's 2006 regional power initiatives as France, Spain and Portugal (*Platts EU Energy*, Issue 189, August 8, 2008). The second tracker focused on Germany, which is a key market for ERGEG's central east, central south, central west and northern electricity regional power initiatives (*Platts EU Energy*, Issue 216, September 25, 2009).

Platts will be seeking to participate in public hearings and workshops pertaining to this document.

German power TSOs chase full compliance with transparency rules

Germany's four power transmission system operators are approaching full compliance with EU-level rules on public disclosure of market-relevant data, according to the results of the second in a series of detailed assessments by Platts of transparency in the European power markets. Platts' survey looked at what is required to be disclosed under EU legislation, as well as what is desired by European energy regulators' group, Ergeg. **Gala Colover** explains the process that led to the detailed results given on pages 15-31.

Platts launched its EU power market transparency tracker in summer 2008 after it became clear that both the European Commission and Ergeg wanted to strengthen the legal requirements for companies to share data in order to boost competition.

The EU first agreed detailed transparency requirements for TSOs and power generators in its congestion management guidelines (CMG), which became binding in December 2006 after being attached to the 2003 EU regulation on cross-border power trading.

The CMG were carried over without change when the regulation was revised as part of the EU's third energy package which entered into force on September 3 (http://ec.europa.eu/energy/gas_electricity/third_legislative_package_en.htm).

There has been much discussion within the EC and the wider energy-industry community over whether these rules go far enough. The third package provides an option for the EC to adopt new, separate guidelines on information provision after consulting two new formal bodies created by the third package: EU power TSO coordination body Entso-e and the Agency for cooperation of European regulators.

"There are no new detailed requirements on transparency in the third package, but [there is] a clear mandate to come up with new rules," an EC energy official told Platts.

Trackers

Subsequent Platts transparency trackers will aim to compare compliance with the CMG and GGP within the different Regional Initiatives and ultimately between regions. (There are seven RIs for electricity and three for gas.) However Platts will only look at three or four TSOs at a time to enable a clear analysis, given the very large volume of data produced by each assessment.

Platts welcomes feedback from stakeholders to improve the tracker going forward.

The EC has no immediate plans to change the CMG, he said, but added that "with time it is probable that the congestion management guidelines will be amended and be fitted in the world of upcoming codes and guidelines."

The EC has not said whether this might include adopting the minimum transparency requirements set out in Ergeg's Guidelines for Good Practice on Information Management and Transparency in Electricity Markets (GGP), developed in 2006 (http://ec.europa.eu/energy/electricity/florence/doc/twg/ergeg_ggpimt.pdf).

But both Ergeg and the EC have been disappointed with the implementation of the CMG and GGP so far.

In June the EC sent first formal warnings to 25 of the 27 EU countries for breaking the rules in the EU's second energy package, with lack of transparency access to cross-border power and gas grid infrastructure one of the main failings (*EUE 211/1*).

And Ergeg, through its regional initiatives, has noted "room for improvement" in its initial reports on how well European TSOs are complying with both the CMG and the GGP.

Why Platts is tracking transparency

Platts' EU power market transparency tracker can be viewed alongside Ergeg's analysis to give an independent perspective of how accessible power market information is to those who want to find it. Where information is available, Platts has given a weblink to take them directly to it.

Platts already collects a plethora of data on the European gas and electricity markets. As well as following events in the markets through news and analysis in its newsletters, Platts publishes daily price assessments for the European gas and electricity markets and collects on a rolling basis any automated power data published through Platts' Powervision tool.

Platts' transparency tracker makes use of these in-house resources and expertise to produce a comprehensive assessment of power market transparency.

Table 1: Overall scores for compliance by German TSOs with CMG and GGP transparency criteria

	Transpower (E.ON)	Amprion (RWE)	ENBW Transportnetze	Vattenfall Europe Transmission
A. Compliance with CMG and GGP				
Y	34** (1)	37**(2)	32.5*(1)	41(1)
S	1	2	3	2 (1)
P (With EEX)	9	3	9	3
P	1	4	2	1
N	0	1	0	0
N (N/R)	6	4	5	5
% of criteria published	66	72	65	80
% Compliance adjustment (-7 N/R)	74	80	73	90
B. Compliance with CMG				
Y	23	26 (1)	24 (1)	26
S	1	1	2	1
P (With EEX)	3	0	2	0
P	1	3	1	1
N	0	0	0	0
N (N/R)	2	0	1	2
% of criteria published	78	88	83	88
% Compliance adjustment (-2 N/R)	84	91	86	92
C. Compliance with GGP				
Y	14** (1)	16**	11*	19 (1)
S	0	1	2	1 (1)
P (With EEX)	7	3	7	3
P	0	1	1	0
N	0	1	0	0
N (N/R)	4	4	4	3
% of criteria published	54	63	46	75
% Compliance adjustment (-5 N/R)	61	78.5	57	86

Compliance adjustment calculated by removing any data for those criteria not required (N/R) by Ergeg's transparency report for northern Europe. This takes the total number of criteria from 52 down to 45. (x) Numbers in brackets denote data that is not required by Ergeg's transparency report for Northern Europe. *1 only available historically, so awarded half a point. ** 2 only available historically, so awarded a half point each. For the purpose of this analysis the calculation for compliance allocates 0.5 Y for every 1 S. Where each Y = 1 and S, denoting incomplete data = 0.5: P: Planned with EEX: Common German TSO transparency platform planned with EEX to publish significant power output and demand data: http://transparency.eex.com/

Sample calculation for Transpower (E.ON): 33 Y + (2 Y available historically, so awarded 0.5 each) + 1 S (awarded 0.5 each) = 34.5. This is then divided by the total number of criteria described under the CMG and GGP (52). So the % of criteria published is 66%.

Compliance -2 N/R calculates the percentage compliance from 28, rather than 30 criteria.

Compliance -5 N/R calculates the percentage compliance from 21, rather than 26 criteria. (NB. Four criteria are included in both the CMG and GGP).

Source: Platts

Table 2: Analysis of compliance with different categories of transparency criteria

Transparency criteria category	Y	S	P	N	N(N/R)	% of total possible	% total required
System load data	18 (2)	0	1(0)	0	5	75	100
Generation	15.5	4 (1)	24 (1)	1	6	33	38
Balancing	26	0	2	0	0	92	92
Interconnection capacity forecast	35 (2)	0	4	0	9	67	82.5
Capacity calculation	23	1	0	0	0	97	97
Network operation	21	2	1	0	0	89.5	89.5
Network investment and planning	7	1	0	0	0	94	94

(x) Numbers in brackets denote data that is not required by Ergeg's transparency report for Northern Europe. P: Planned with EEX: Common German TSO transparency platform planned with EEX to publish significant power output and demand data: http://transparency.eex.com/

Source: Platts

Platts European power market transparency assessment: Summary of results for Germany

	Transpower (E.ON)	Amprion (RWE)	ENBW Transportnetze	Vattenfall Europe Transmission
System load data				
Load on the grid	Y	Y	Y	Y
Net import/export data	Y	Y	Y	Y
Day ahead demand	Y (ETSOVista)	Y	Y	Y
Week ahead demand	N (N/R)	P	N (N/R)	N (N/R)
Year ahead demand: grid-level (sub)hourly D-365 forecast load	N (N/R)	Y	Y (ENTSO-E)	N (N/R)
Forecast import balance vs production:	Y (ENTSO-E)	Y	Y (ENTSO-E)	Y
Generation				
Planned outages for large units (>100 MW)	P (WITH EEX)	Y	P (WITH EEX)	Y
Advanced warning of unit outages (<100 MW)	P (WITH EEX)	N	P (WITH EEX)	P (WITH EEX)
Advanced warning of offtake unit outages	P (WITH EEX)	P (WITH EEX)	P (WITH EEX)	P (WITH EEX)
Reservoir levels	N (N/R)	N (N/R)	N (N/R)	N (N/R)
Unplanned production unit outages	P (WITH EEX)	S	P (WITH EEX)	Y
Unplanned offtake unit outages	P (WITH EEX)	P (WITH EEX)	P (WITH EEX)	P (WITH EEX)
Aggregate production data	P (WITH EEX)	Y	S	Y
Unit production data	P (WITH EEX)	P (WITH EEX)	P (WITH EEX)	Y
Unit outage history	P (WITH EEX)	S	P (WITH EEX)	Y
Scheduled generation per control area	P (WITH EEX)	Y	P (WITH EEX)	Y
Unit load factor	N (N/R)	N (N/R)	P (WITH EEX)	S (Can be derived)
Actual wind production	Y*	Y	Y	Y
Forecast wind production	Y*	Y	Y*	Y
Balancing				
Relevant info on the balancing market	Y	Y	Y	Y
Balancing bids and offers	Y**	Y**	Y**	Y**
Average and marginal prices	Y**	Y**	Y**	Y**
Imbalance prices	Y	Y	Y	Y
Control area imbalance	Y	Y	Y	Y
Financial balance of the whole market	Y	P	P	Y (can be derived)
Market information on the type of balancing	Y	Y	Y	Y
Interconnector capacity forecast				
Monthly M+1 forecasts of available transmission capacity	Y	Y	Y	Y (E-trace)
Monthly Y+1 forecasts of available transmission capacity	Y	Y	Y	Y (E-trace)
Weekly W-ahead transmission capacity forecasts	P	P	P	P
Daily D-ahead transmission capacity	Y	Y	Y	Y
Daily intra-day transmission capacity	Y	Y	Y	Y
Interconnector project info/impact on cross border trade	Y	Y	Y	Y
Capacity allocated by market time unit and its usage	Y	Y	Y	Y (E-trace)
Real time update of capacity purchased, price	Y	Y	Y	Y (E-trace)
Utilization of allocated capacity/capacity nominated	Y	Y (ETSOVista)	Y	Y (ETSOVista)
Reserved balancing capacity	N (N/R)	N (N/R)	N (N/R)	N (N/R)
Interconnector bids/sales/utilization	Y	Y	N (N/R)	Y (E-Trace, ETSOVista)
Interconnector priority bids/sales/utilization	N (N/R)	N (N/R)	N (N/R)	N (N/R)
Capacity calculation				
Description of interconnection congestion management method	Y	Y	Y	Y
Interconnector capacity calculation method	Y	Y	Y	Y
Grid congestion management, capacity allocation method	Y	Y	Y	S
Times, procedures for applying for grid capacity	Y	Y	Y	Y
Description of products offered	Y	Y	Y	Y
Obligations, rights of TSOs and third parties	Y	Y	Y	Y
Network operation				
Network availability/outage data	Y	Y	Y	Y
Import/Export balance	Y	Y	Y	Y (ETSOVista)
Description of effect of TSOs corrective actions	Y	P	Y	Y
Network access procedure	Y	Y	Y	Y
Network use data	Y	Y	Y	Y
Congestion report – where it exists and why	S	Y	S	Y
Network investment and planning				
System maps/grid expansion projects	Y	Y	S	Y
Planned grid outages	Y	Y	Y	Y

Transparency criteria in **BOLD TYPE**: Required under EU Congestion Management Guidelines; Transparency criteria in PLAIN TYPE: Desired by Ergeg in its Guidelines for Good Practice.

Y: Information available from the German power TSOs (Transpower (E.ON), Amprion (RWE), ENBW Transportnetz and Vattenfall Europe Transmission); S: Some information available from TSO; P: information not currently available but planned to be published in the near future by the TSO; N: Information unavailable from TSO; N(N/R): Information unavailable from TSO, but not actually required to be published, according to Ergeg's analysis of transparency in the northern regional power market. Source: Platts

The first tracker focused on southwest Europe, defined by the EC and Ergeg's 2006 regional power initiatives as France, Spain and Portugal. It generated a substantial volume of feedback from the European energy sector and was broadly welcomed by the TSOs themselves, the EC and the wider energy community.

This second tracker focuses on Germany, which is a key market for Ergeg's central east, central south, central west and northern electricity regional power initiatives.

The tracker focuses on disclosure of information by Germany's four biggest TSOs, as they are subject to the lion's share of obligations on transparency under the CMG. But in some cases, when unable to find data, our assessors searched the websites of Germany's dominant power utilities as well.

Platts did not search the Etsovista website (https://www.etsovista.org/home.aspx), which was set up in November 2006 by the TSOs' then European trade body Etso as a platform to disclose its member TSO's transparency information.

This was because Platts' analysis looked at how a search for specific information would be directed taking a TSO's own website as a first port of call. However the tracker gives links to other websites where the TSOs have directed our assessors there, either through links on their site or after Platts contacted them.

The tracker details what information our assessors could find corresponding to both the CMG and GGP. The CMG predominantly relate to system load data, balancing, interconnector capacity forecast, capacity calculation and network operation information. The GGP relate more to generation, balancing and network investment and planning information.

Platts gave all four TSOs surveyed – Transpower (E.ON), Amprion (RWE); ENBW Transportnetz and Vattenfall Europe Transmission – the opportunity to direct our assessors to data where it appeared unavailable.

An at-a-glance overview of the results of this analysis is given on page 10.

In many cases, data was given on other websites other than those of the TSOs themselves, including Etsovista, Entso-e and the new coordinated cross-border auction offices such as E-trace. To be concise Platts has not attempted to quantify the proportion of data available from the TSO's own websites compared with shared data platforms in the summary tables on page 9, however this information can be found easily by referring to the relevant section of the full tracker on page 15.

More detail on the role of such centralized TSO information websites is given in a qualitative analysis of the tracker on page 12.

Seven exemptions

The tables on page 9 give a breakdown of each TSO's overall compliance with the GGP and CMG together (A); the GGP only (B) and the CMG only (C). Each table gives two sets of results. The first gives the percentage of all possible criteria searched for that is published by each TSO. And the second gives the percentage of all criteria that TSOs are obliged to publish that Platts assessors were able to find.

This is because seven out of the 52 criteria listed in the CMG and GGP are not required for Germany, according to Ergeg's 2007 transparency report for northern Europe. Of these, none of the four German TSOs publish reservoir levels (GGP), reserved balancing capacity (GGP), interconnector priority bids (GGP) or week ahead demand (CMG) – although Amprion (RWE) told Platts it plans to publish this information in the near future. "Implementation [is] in progress," Amprion said. "Up to now [there has been] no publication because of missing weekly-products in Germany."

And although it is not required, Amprion (on its own website) and EnBW Transportnetz (on the Entso-e website) make data available for their forecasts of year-ahead demand (CMG).

EnBW also says it plans to publish unit load factor data (GGP) when it launches its joint website with EEX. At the moment Vattenfall Europe Transmission is the only German TSO to publish some information on this. EnBW Transportnetz is however the only one of the four TSOs studied in this analysis that did not publish any information on interconnector bids, sales and utilization (GGP) at the time of this survey. The other three TSOs all provided links to this information, even though it is not officially required.

The results

A basic quantitative analysis of the results of this survey showed that the four German TSOs publish at least three quarters of all information both required and desired by the EC and Ergeg respectively in six of the seven categories of data searched for by Platts assessors.

All four TSOs publish all the information for system load data that they are required to according to Ergeg's 2007 northern Europe transparency report, but apart from Vattenfall Europe Transmission, the TSOs publish scant data on power generation (see table 2).

This tallies with the results of Ergeg's first monitoring report on transparency in northern Europe, published on August 4, 2008, which found that large power producers in Germany had begun publishing information about their generation units on their websites, but TSOs had yet to comply with requirements for publishing generation data.

Ergeg reported then that the German TSOs would collaborate, with the German energy regulator's support, to

publish this information together on the website of the German power exchange EEX, with first information "available late 2008". Most of that information is still pending – however, when questioned, the TSOs told Platts the launch of this website is planned for this autumn. Platts' analysis showed that altogether the four TSOs currently publish 38% of generation information required under the CMG and GGP and all the remaining missing information is planned to be published on the EEX website.

The summary table shows clearly that all four TSOs publish similar amounts of data which tend to be available in the same categories. However Vattenfall Europe Transmission comes out as the most transparent of the German TSOs by a thin margin, publishing 90% of all information required overall (80% of all criteria possible); 92% of all required CMG (88% of all possible); and 86% of all required CMG (75% of all possible).

On the surface, EnBW appears to be the least transparent of the German TSOs at present, publishing 73% of all required transparency criteria and 65% of the total possible. EnBW fared marginally better than Transpower (E.ON) – by a margin of 2% – when it came to publishing information on required CMG criteria, but fell to the bottom of the pack again for GGP criteria,

publishing at present only 57% of those required by Ergeg and the EC.

Not just numbers

The statistical analysis could be drawn out further, but in the context of assessing transparency, such an analysis could be both unfair to the transmission system operators and misleading. This is not least because all four TSOs told Platts they are planning to publish the missing required information within months.

For example Vattenfall Europe Transmission said, "Information about corrective actions with impact on previously allocated cross-border capacity rights and trade will be published as soon as available – so far no such event occurred." And EnBW told Platts assessors, "There are no weekly auctions at the moment. We will publish this forecast [in] the fourth quarter of 2009." RWE also told Platts, "Single missing publications will be online end of October."

But, equally important for this analysis of transparency is how long it took Platts' assessors to find what they were looking for and how comprehensible that information was. A qualitative analysis is therefore also necessary and is given below.

Transparency drive transforms German power grid businesses

A year ago Platts published its first transparency tracker, looking in-depth at the French, Portuguese and Spanish power markets. Now the spotlight is on Germany, whose size and location makes it a hugely influential European power market. So how easy is it to find and make sense of information published by the German grid operators? **Siobhan Hall** reports.

The four biggest German power transmission system operators are going through turbulent times. In the past year E.ON Netz and RWE Transportnetz Strom have been restructured and rebranded as Transpower and Amprion respectively. Parent E.ON has committed to sell Transpower to settle an anti-trust case brought by the European Commission, Swedish parent Vattenfall has plans to sell its German TSO Vattenfall Europe Transmission and EnBW is mulling selling its TSO EnBW Transportnetz.

Meanwhile in August the German government said it wanted to see the four integrated into a single national TSO in which the state would hold a 25.1% stake (*EUE 215/17*).

All this puts the German TSOs under strong legal, regulatory and market pressure to increase transparency and thus grid accessibility in the German power market.

The result is major changes in the TSOs' cooperation and coordination with each other, and these are continuing. In the course of Platts' assessment the TSOs and regulators involved stressed that more developments are planned for this autumn, most significantly a common website between the four TSOs and Germany's European Energy Exchange to publish generation and consumption data.

EEX shareholders include Amprion, VET, and the trading arms of the E.ON and EnBW groups. Platts' approach in carrying out its transparency assessment and analyzing the quantitative findings are detailed separately (see page 8), and the assessment itself is published in full on page 15.

But a qualitative approach is also needed to assess how easy the information was to find and to make sense of. This is of course more subjective and open to different interpretations, but some clear trends emerge.

The first is the general consistency in the way the four German TSOs present their information. All refer to the statutory requirements to publish data, and use similar language to the EU's 2006 binding congestion management guidelines in their menu headings. Only Transpower has a "transparency" link on its home page, but the others have clear links to grid user data, and so it is generally easy for a user to find information corresponding to the congestion management guidelines – where it is published.

Using such standardized headings and presentation also makes it easier for the user to realize quickly what information is not published, thus saving searching time. This was more of an issue in the 2008 southwest Europe tracker, where the French, Portuguese and Spanish each had different styles for presenting information.

German-speakers have the edge
The next trend is that in general German-speakers have access to slightly more detailed and more up-to-date information than non-German speakers. All four TSOs maintain parallel English-language websites, but not always with the same information.

For example, EnBW's monthly month-ahead and year-ahead forecasts of available transmission capacity on the German-Swiss border are more up to date in German than English.

Similarly, Amprion offers more detail on balancing market statistics in German than English on its new website – which only launched this month.

This was also an issue in 2008's southwest Europe tracker, which found that local language speakers had a clear advantage over others.

This can also be seen in the common balancing website which the four TSOs set up in 2006 to organize coordinated auctions for balancing power. The site is only available in German, though VET told Platts that an English version was being prepared.

But language may be less of barrier these days, with machine translators such as Google good enough to direct a user to the required data. And EnBW, for example, simply includes links on the English site to the data in German.

The third trend is also similar to the 2008 findings for southwest Europe, namely that the vaguer the definition of the information to be published, the harder it is to verify that it is published. This is particularly true of information that is not a dataset, such as reports on congestion management or "relevant information" on the balancing market or network access.

This is something that European energy regulators have tried to address by producing detailed interpretations of what the EU's congestion management guidelines

require TSOs to do. Germany was covered by the first such European Regulators Group for Electricity and Gas transparency report, published in September 2007 by the regulators involved in the northern European regional power initiative.

Ergeg set up seven such regional power initiatives in 2006 in a bid to speed up regional integration, and Germany – which borders nine other countries – is involved in four of them.

The northern Europe region includes Denmark, Finland, Norway and Sweden – seen by many regulators as a model for European power transparency because of the high degree of coordination and data publication through their common NordPool power exchange – plus Germany and Poland.

In August 2008 the northern European regulators published a first monitoring report on TSOs' compliance with the parts of the 2007 Ergeg report covering load, transmission, interconnectors and balancing.

It concluded that transparency was generally high in northern Europe, but that there was still room for improvement. For example it was not always possible to monitor if information was being published close to real time, as the original transparency report did not explicitly require TSOs to include time stamps on their updates.

This fits with a general impression of Platts' assessors that the German TSOs' efforts are focused on complying with the rules. They do this efficiently and effectively – if slowly on generation aid – but without necessarily really considering what the rules are trying to achieve, namely, making it easier for new entrants to find information and take an equal part in the German power market.

But the TSOs see themselves as between a rock and a hard place – or rather a customer and a regulator. "Please note that we – as a regulated company – have to focus our activities to the implementation of requirements resulting from the congestion management guidelines and the report on transparency for the north European region, because any additional effort and corresponding costs for voluntary publications of information are not eligible costs for the grid usage tariff," VET told Platts.

Generation still to come
The regulators' first monitoring report did not cover generation, as Ergeg's 2007 transparency report set a July 1, 2008 deadline for the TSOs to start publishing generation data.

German generators – including all the parent companies of the four biggest German TSOs – started voluntarily publishing some of their data on the EEX in April 2006, and in June this year German generators and TSOs announced a project to work with EEX on a joint website for publishing "significant generation and consumption

data". Transpower told Platts: "We are confident that the publication of generation and consumption will be realized in autumn this year."

German energy regulator BNetzA press officer Renate Hichert told Platts that this was an "important project," and that the German TSOs had worked to improve their transparency since 2007.

The regulators are working on the second monitoring report for the northern Europe region, which is to focus mainly on generation data, said Hichert, and plan to publish it later this year. Until then the regulators would not comment in detail, she said.

Meanwhile one new entrant trader told Platts that unequal access to up-to-date generation data was a distortion in the German market. "Some of the operators, particularly producers/generators, have a lot more information regarding production, availability, outages, strikes…and they have it in real time,"the new entrant trader said.

"EEX data are only refreshed once a day and sometimes it is too late when it is received by operators," he said. He wanted to see EEX data refreshed more frequently, with ideally notification emails to operators.

There was enough information on forecast available capacity, he said, but no forecast production or consumption, only historical data.

Interestingly, the lack of plant by plant generation data did not bother him, despite the congestion management guidelines requiring TSOs to publish ex-ante data on planned outages and day-after data on planned and unplanned outages for all power plants above 100 MW.

"For us it is not very important," he said. "The aggregated data per kind of generation is what really matters."

But he was unimpressed by the turnaround on balancing data. "The information on balancing price and quantity is coming quite late, about 45 days delay," he said. "In France we have this information after one to seven days."

Rise of centralized websites

Platts' assessors focused on the TSOs' own websites, but increasingly much of the information required by the congestion management guidelines is available on centralized websites such as the new coordinated auction offices for allocating cross-border capacity, or etsovista.org, the transparency platform set up by the TSOs' European trade body Etso, now renamed Entso-e.

The congestion management guidelines divided EU countries into seven regions similar to Ergeg's regional power initiative groupings, and required each region to introduce common coordinated congestion management methods by January 1, 2007.

As a result German TSOs are now involved in several centralized auction procedures, each with their own website. These include:

- www.e-trace.biz, for the German-Polish/Czech border;

- www.nordpoolspot.com, for the German-Danish/East interconnector;

- www.eonnetz-eltra-auctions.org, for the German/Danish border between Transpower and Energinet.dk;

- www.casc-cwe.eu, a joint service between the TSOs of Belgium, France, Germany, Luxembourg and the Netherlands to auction capacity on the common borders between the five countries;

- www.tso-auction.org, a joint TSO service for auctioning capacity on the common German, Belgian and Dutch borders;

- www.intraday-capacity.com/portal/php/main.php, for intraday capacity between Germany and Denmark, France, the Netherlands and Switzerland.

The German TSOs give links to these central sites, and to Etsovista.org where relevant. Some of the information is also available on the Entso-e home website, although not all the TSOs have put the relevant links on their sites yet. Entso-e is to have a formal role in coordinating TSOs and developing EU grid codes under the EU's newly-adopted third energy package laws.

These centralized European sites are in English and intended for an international audience, as they each cover several countries and local languages.

Input from TSOs

All four German TSOs were happy to help when Platts contacted them to query missing or unclear information in detail. And it was noticeable that there was little difference in the list of queries between the four, implying that their websites are roughly equally easy to use – and are of roughly equal use.

All four provided detailed answers to Platts' detailed questions, and all four were able to provide web links to information that Platts' assessors had struggled to find themselves, or explain why it was not published – for example, because it was not required in the regulators' transparency report. This demonstrates that simply publishing information does not immediately improve transparency.

Platts only asked the TSOs to check the links that the assessors were unsure of or could not find easily. Given the amount of information to be checked, it may be that some of the links found by the Platts assessors are not the most relevant links – another indication that there is more to transparency than simply publishing information.

PLATTS EUROPEAN POWER MARKET TRANSPARENCY ASSESSMENT: GERMANY

TRANSPARENCY TRACKER

Transparency Criteria	Transpower (E.ON)		Amprion (RWE)		ENBW Transportnetze		Vattenfall Europe Transmission	
	Published?	Frequency	Published?	Frequency	Published?	Frequency	Published?	Frequency
System load data								
Load on the grid	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Vertical_grid_load/index.htm and www.eon-netz.com/pages/ehn_de/Veroeffentlichungen/Netzkennzahlen/Jahreshoechstlast_und_Lastverlauf/Lastverlauf_Hochspannungsnetz/index.htm	Day after, 1/4-hourly data in German and English. 380kV and 220kV from Transpower website and 110kV from Eon Netz website.	Yes - www.amprion.net/en/vertical-load	Day after, 1/4-hourly data	Yes - www.enbw.com/content/de/netznutzer/strom/netzkennzahlen/vertikale_netzlast/index.jsp	Day after, 1/4-hourly data.	Yes - www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/149.htm	Day after, 1/4-hourly data
Net import/export data	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Cross-border_load_flows__Realised_schedules/index.htm	Day after, 1/4-hourly data	Yes - www.amprion.net/en/cross-border-load-flows#/	Day after, 1/4-hourly data	Yes - www.enbw.com/content/de/netznutzer/strom/grenz_lastfluesse/index.jsp	Day after, 1/4-hourly data.	Yes - www.vattenfall.de/www/trm_en/trm_en/941233gridx/941395conge/941485loadx/index.jsp	Day after, 1/4-hourly data
Day ahead demand	Yes - www.etsovista.org	Daily, registration required	Yes - www.amprion.net/en/demand-in-control-area#	Published day ahead, 1/4-hourly data	Yes - www.enbw.com/content/de/netznutzer/strom/netzkennzahlen/prognose_vertikale_netzlast/index.jsp	Day ahead, 1/4-hourly data.	Yes - www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/156.htm	Day ahead, 1/4-hourly data
Week ahead demand	No - TSO says not required in Ergeg's transparency report for northern Europe		No - TSO says in progress	Planned to be weekly	No - TSO says not required in Ergeg's transparency report for northern Europe		No - TSO says not required in Ergeg's transparency report for northern Europe	

KEY: Transparency criteria in **BOLD TYPE: required under EU Congestion Management Guidelines**; Transparency criteria in PLAIN TYPE: desired by Ergeg in its Guidelines for Good Practice.
Source: Platts

PLATTS EUROPEAN POWER MARKET TRANSPARENCY ASSESSMENT: GERMANY

TRANSPARENCY TRACKER

Transparency Criteria	Transpower (E.ON) Published?	Frequency	Amprion (RWE) Published?	Frequency	ENBW Transportnetze Published?	Frequency	Vattenfall Europe Transmission Published?	Frequency
Year ahead demand: grid-level (sub)hourly D-365 forecast load	No - TSO says not required in Ergeg's transparency report for northern Europe		Yes - www.amprion.net/leistungsbilanz	Yearly	Yes - link given to Entso-e Outlook Report: http://entsoe.eu/_library/publications/entsoe/outlookreports/090605-Rp-WRRSOR_2009_Final_report.pdf	Yearly	No - As above	
Forecast import balance vs production:	Yes - www.entsoe.eu/resources/publications/entsoe/outlookreports/	Yearly	Yes - winter outlook forecast gives overview: www.amprion.net/sites/default/files/pdf/Leistungsbilanz-auszug-seite-A34.pdf	Yearly	Yes - link to Entso-e report: http://entsoe.eu/_library/publications/entsoe/outlookreports/090605-Rp-WRRSOR_2009_Final_report.pdf	Yearly	Yes - www.entsoe.eu/_library/publications/etso/WOR0809_Final_311008.pdf	Yearly
Generation								
Planned outages for large units (>100 MW)	No - but common German TSO transparency platform planned with EEX to publish significant power output and demand data: http://transparency.eex.com/	Planned for autumn	Yes - aggregated with disclaimer at: www.amprion.net/kraftwerksausfaelle-100-mw	Published day ahead, daily data.	No - but common German TSO transparency platform planned with EEX to publish significant power output and demand data: http://transparency.eex.com/	Planned for autumn	Yes - aggregated data in German: www.vattenfall.de/www/vf/vf_de/225583xberx/261603trans/261621exxan/index.jsp and on EEX: www.eex.com/en/Transparency/Power%20plant%20information/Data/Available%20capacity	Daily

KEY: Transparency criteria in **BOLD TYPE: required under EU Congestion Management Guidelines**; Transparency criteria in PLAIN TYPE: desired by Ergeg in its Guidelines for Good Practice.
Source: Platts

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PLATTS EUROPEAN POWER MARKET TRANSPARENCY ASSESSMENT: GERMANY

Transparency Criteria	Transpower (E.ON)		Amprion (RWE)		ENBW Transportnetze		Vattenfall Europe Transmission	
	Published?	Frequency	Published?	Frequency	Published?	Frequency	Published?	Frequency
Advanced warning of unit outages (<100 MW)	No - as above		No - but common German TSO transparency platform planned with EEX to publish significant power output and demand data: http://transparency.eex.com/	Planned for autumn	No - see above		No - but common German TSO transparency platform planned with EEX to publish significant power output and demand data: http://transparency.eex.com/	Planned for autumn
Advanced warning of offtake unit outages	No - as above		No - as above	Planned to be ex-ante: once a year (schedules)	No - see above		No - see above	
Reservoir levels	No - not required for Germany		No - not required for Germany		No - not required for Germany		No - not required for Germany	
Unplanned production unit outages	No - common German TSO transparency platform planned with EEX to publish significant power output and demand data: http://transparency.eex.com/		Yes - aggregated for >100 MW only: www.amprion.net/kraftwerksausfaelle-100-mw	Daily	No - TSO says planned on common German TSO transparency platform with EEX: http://transparency.eex.com/		Yes - aggregated data in German: www.vattenfall.de/www/vf/vf_de/225583xberx/261603trans/261621exxan/index.jsp and on EEX: www.eex.com/en/Transparency/Power%20plant%20information/Data/Available%20capacity	Ad-hoc (on Vattenfall Europe website max. 60 minutes after the event)
Unplanned offtake unit outages	No - as above		No - TSO says planned on common German TSO transparency platform with EEX http://transparency.eex.com/	Planned to be ex-post: ad-hoc, max-delay 2 hours	No - see above		No - TSO says planned on common German TSO transparency platform with EEX: http://transparency.eex.com/	

KEY: Transparency criteria in **BOLD TYPE: required under EU Congestion Management Guidelines**; Transparency criteria in PLAIN TYPE: desired by Ergeg in its Guidelines for Good Practice.
Source: Platts

PLATTS EUROPEAN POWER MARKET TRANSPARENCY ASSESSMENT: GERMANY

Transparency Criteria	Transpower (E.ON)		Amprion (RWE)		ENBW Transportnetze		Vattenfall Europe Transmission	
	Published?	Frequency	Published?	Frequency	Published?	Frequency	Published?	Frequency
Aggregate production data	No - as above		Yes - www.amprion.net/en/generation-in-the-control-area#	Published day ahead and day after, 1/4-hourly data	Yes/No - feed-in load includes both plants and distribution networks: www.enbw.com/content/de/netznutzer/strom/netzkennzahlen/lastverlauf/index.jsp	Day after, 1/4-hourly data	Yes - www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/155.htm	Day after, 1/4-hourly data
Unit production data	No - as above		No - TSO says planned on common German TSO transparency platform with EEX: http://transparency.eex.com/	Planned to be daily	No - but common German TSO transparency platform planned with EEX to publish significant power output and demand data: http://transparency.eex.com/		Yes - www.vattenfall.de/www/vf/vf_de/225583xberx/261603trans/261638exxpo/index.jsp	Day after, 1/4-hourly data
Unit outage history	No - As above		No - aggregated for >100 MW only: www.amprion.net/kraftwerksausfaelle-100-mw	Published day ahead, daily data.	No - see above		Yes - www.vattenfall.de/www/vf/vf_de/225583xberx/261603trans/261655umm/263289allex/index.jsp	Ad hoc
Scheduled generation per control area	No - as above		Yes - aggregated with disclaimer at www.amprion.net/en/generation-in-the-control-area#	Published day ahead, 1/4-hourly data	No - see above		Yes - www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/154.htm	Day ahead
Unit load factor	No - TSO says not required in Ergeg's transparency report for northern Europe		No - TSO says not required in Ergeg's transparency report for northern Europe		No - see above		Yes - can be derived from unit generation data, only for Vattenfall generator's own plants	

KEY: Transparency criteria in **BOLD TYPE: required under EU Congestion Management Guidelines**; Transparency criteria in PLAIN TYPE: desired by Ergeg in its Guidelines for Good Practice.
Source: Platts

PLATTS EUROPEAN POWER MARKET TRANSPARENCY ASSESSMENT: GERMANY

Transparency Criteria	Transpower (E.ON)		Amprion (RWE)		ENBW Transportnetze		Vattenfall Europe Transmission	
	Published?	Frequency	Published?	Frequency	Published?	Frequency	Published?	Frequency
Actual wind production	Yes - www.transpower.de/ pages/tso_en/Trans parency/Publication s/Network_figures/ Actual_and_forecast _wind_energy_feed-in/index.htm	Day after, 1/4-hourly data.	Yes - www.amprion.net/e n/wind-data-according-to-17-stromnzv	On the day with 15 minute delay, 1/4-hourly	Yes - www.enbw.com/con tent/de/netznutzer/ strom/erneuerbare_ energien/windeinsp eisung/index.jsp	Day after, 1/4-hourly data	Yes - www.vattenfall.de/c ps/rde/xchg/trm_d e/hs.xsl/153.htm	Day after, 1/4 hourly data
Forecast wind production	Yes - only available historically: www.transpower.de/ pages/tso_en/Trans parency/Publication s/Network_figures/ Actual_and_forecast _wind_energy_feed-in/index.htm	Day after, 1/4-hourly data	Yes - www.amprion.net/e n/wind-data-according-to-17-stromnzv	On the day in step with actual data.	Yes - only available historically: www.enbw.com/con tent/de/netznutzer/ strom/erneuerbare_ energien/windprogn ose/index.jsp	Day after, 1/4-hourly data	Yes - www.vattenfall.de/c ps/rde/xchg/trm_d e/hs.xsl/152.htm	Day ahead, 1/4 hourly data
Balancing								
Relevant info on the balancing market	Yes - in English at www.transpower.de/ pages/tso_en/Trans parency/Publication s/Tender_of_balanci ng_power/Overview /index.htm plus separate website in German only for coordinated balancing tenders with ENBW, RWE and VET: www.regelleistung.n et/regelleistungWeb /	Ad hoc - common site/process for all four since December 2007	Yes - in English at www.amprion.net/e n/control-energy/ plus separate website in German only for coordinated balancing tenders with E.ON Netz, ENBW and VET at: www.regelleistung.n et/regelleistungWeb /	Ad hoc	Yes - in English at www.enbw.com/con tent/en/system_us er/power/control_p ower/index.jsp plus separate website in German only for coordinated balancing tenders with E.ON Netz, RWE and VET at: www.regelleistung.n et/regelleistungWeb /	Ad hoc	Yes - in English at www.vattenfall.de/w ww/trm_en/trm_en /941683compe/94 1701balan/index.js p plus separate website in German only for coordinated balancing tenders with ENBW, E.ON Netz and RWE: www.regelleistung.n et/regelleistungWeb /	Ad hoc

KEY: Transparency criteria in **BOLD TYPE: required under EU Congestion Management Guidelines**; Transparency criteria in PLAIN TYPE: desired by Ergeg in its Guidelines for Good Practice.
Source: Platts

PLATTS EUROPEAN POWER MARKET TRANSPARENCY ASSESSMENT: GERMANY

TRANSPARENCY TRACKER

Transparency Criteria	Transpower (E.ON) Published?	Frequency	Amprion (RWE) Published?	Frequency	ENBW Transportnetze Published?	Frequency	Vattenfall Europe Transmission Published?	Frequency
Balancing bids and offers	Yes - on common German TSO balancing website in German only: www.regelleistung.net/regelleistungWeb/publicAusschreibungen/PublicAusschreibungenController.jpf	Daily, bidders must register	Yes - on common German TSO balancing website in German only: www.regelleistung.net/regelleistungWeb/publicAusschreibungen/PublicAusschreibungenController.jpf	Daily, bidders must register	Yes - on common German TSO balancing website in German only: www.regelleistung.net/regelleistungWeb/publicAusschreibungen/PublicAusschreibungenController.jpf	Daily, bidders must register	Yes - on common German TSO balancing website in German only: www.regelleistung.net/regelleistungWeb/publicAusschreibungen/PublicAusschreibungenController.jpf	Daily, bidders must register
Average and marginal prices	Yes - as above	Yearly, monthly, daily	Yes - as above	Yearly, monthly, daily	Yes - as above	Yearly, monthly, daily	Yes - as above	Yearly, monthly, daily
Imbalance prices	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Balance_group/Balance_Group_Deviation_as_of_01.05.2009/index.htm	Monthly	Yes - www.amprion.net/en/control-area-balance	Monthly with at least 2-month delay	Yes - most recent data in German: www.enbw.com/content/de/netznutzer/strom/bilanzkreis/bilanzkreisabrechnung/index.jsp	At least two month in arrears last data July 2009	Yes - www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/SetWebsiteLanguage.xml?languagevariantid=ENG&lang=en&targetPage=140.htm	Monthly per balancing mechanism time unit
Control area imbalance	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Control_zone_balance/index.htm	Day after	Yes - www.amprion.net/en/control-area-balance	At least 1 month in arrears	Yes - www.enbw.com/content/de/netznutzer/strom/bilanzkreis/regelzonensaldo/index.jsp	Day after, 1/4-hourly data.	Yes - www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/SetWebsiteLanguage.xml?languagevariantid=ENG&lang=en&targetPage=136.htm	Daily per balancing mechanism time unit
Financial balance of the whole market	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Balance_group/Balance_Group_Deviation_as_of_01.05.2009/index.htm	Monthly	No - TSO says in progress	Planned to be monthly	No - TSO says in progress	Planned to be monthly	Yes - TSO says can be calculated from the imbalance volumes and corresponding imbalance prices, see links above	Monthly per balancing mechanism time unit

KEY: Transparency criteria in **BOLD TYPE: required under EU Congestion Management Guidelines**; Transparency criteria in PLAIN TYPE: desired by Ergeg in its Guidelines for Good Practice.
Source: Platts

Transparency Criteria	Transpower (E.ON)		Amprion (RWE)		ENBW Transportnetze		Vattenfall Europe Transmission	
	Published?	Frequency	Published?	Frequency	Published?	Frequency	Published?	Frequency
Market information on the type of balancing	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Use_of_balancing_power/index.htm, www.regelleistung.net/regelleistungWeb/static/info_regelleistung.jsp	2-3 times/year	Yes - www.amprion.net/kennzahlen-und-statistiken	Daily	Yes - secondary reserve: www.enbw.com/content/de/netznutzer/strom/regelenergie/sekundearregelleistung_einsatz/index.jsp, minute reserve www.enbw.com/content/de/netznutzer/strom/regelenergie/mr_einsatz/index.jsp, more info: www.regelleistung.net	Hourly	Yes - www.regelleistung.net	Ad hoc

Interconnector capacity forecast

Transparency Criteria	Transpower (E.ON)		Amprion (RWE)		ENBW Transportnetze		Vattenfall Europe Transmission	
Monthly M+1 forecasts of available transmission capacity	Yes - Auction results for German-Danish border: www.eonnetz-eltra-auctions.org/, for Germany-Czech border on Coordinated Auction Office website: www.e-trace.biz/2006/index_month.htm, for German-Dutch border on TSO Auction website: www.tso-auction.org/monthauction/default.aspx	Monthly	Yes - links to all borders: www.amprion.net/en/forecasts-of-transmission-capacity-available-to-the-market, German-Dutch border on TSO Auction website: www.tso-auction.org/monthauction/default.aspx, for DE-FR-NL borders at: www.casc-cwe.eu/en/Market-data/Long-Term-Auctions-Specifications/Monthly-Products	Monthly	Yes - for German-Swiss border: www.enbw.com/content/de/netznutzer/strom/auktion_d_ch/monatsauktion/index.jsp, for German-French border links: www.enbw.com/content/de/netznutzer/strom/netzengpaesse/f/index.jsp, no congestion on German-Austrian border: www.enbw.com/content/en/system_user/power/grid_congestions/a/index.jsp	Monthly	Yes - Coordinated auction office E-trace publishes capacity offered for monthly auctions in English: www.e-trace.biz/2006/index_month.htm	Monthly

KEY: Transparency criteria in **BOLD TYPE: required under EU Congestion Management Guidelines**; Transparency criteria in PLAIN TYPE: desired by Ergeg in its Guidelines for Good Practice.
Source: Platts

PLATTS EUROPEAN POWER MARKET TRANSPARENCY ASSESSMENT: GERMANY

TRANSPARENCY TRACKER

Transparency Criteria	Transpower (E.ON) Published?	Frequency	Amprion (RWE) Published?	Frequency	ENBW Transportnetze Published?	Frequency	Vattenfall Europe Transmission Published?	Frequency
Monthly Y+1 forecasts of available transmission capacity	Yes - Auction results for German-Danish border: www.eonnetz-eltra-auctions.org/, for German-Czech border on Coordinated Auction Office website: www.e-trace.biz/2006/index_year.htm, for German-Dutch border on TSO Auction website: www.tso-auction.org/yearauction/availablecapacity/default.aspx	Appear to be updated only once a year.	Yes - links for all borders: www.amprion.net/en/forecasts-of-transmission-capacity-available-to-the-market, German-Dutch border on TSO auction website: www.tso-auction.org/yearauction/availablecapacity/default.aspx, New CWE single auction office for DE-FR-NL borders at: www.casc-cwe.eu/en/Market-data/Long-Term-Auctions-Specifications/Yearly-Products	Yearly	Yes - for German-Swiss border: www.enbw.com/content/de/netznutzer/strom/auktion_d_ch/jahresauktion/index.jsp, for German-French and German-Austrian border, see links above	Yearly	Yes - Coordinated auction office E-trace published capacity offered for 2009 yearly auction in English: www.e-trace.biz/2006/docs/ANNOUNCEMENT_11_11_2008_yearly_to%20be%20published.pdf	November 2008 (yearly)
Weekly W-ahead transmission capacity forecasts	No - but TSO says link planned by end October with weekly updates	Planned weekly	No - but TSO says in progress	Planned to be weekly	No - but TSO says in progress	Planned by Q409	No - but TSO says in progress	Planned with new coordinated auction offices

KEY: Transparency criteria in **BOLD TYPE: required under EU Congestion Management Guidelines**; Transparency criteria in PLAIN TYPE: desired by Ergeg in its Guidelines for Good Practice.
Source: Platts

PLATTS EUROPEAN POWER MARKET TRANSPARENCY ASSESSMENT: GERMANY

TRANSPARENCY TRACKER

Transparency Criteria	Transpower (E.ON)		Amprion (RWE)		ENBW Transportnetze		Vattenfall Europe Transmission	
	Published?	Frequency	Published?	Frequency	Published?	Frequency	Published?	Frequency
Daily D-ahead transmission capacity	Yes - for German-Danish border: www.transpower.de/pages/tso_en/Transparency/Publications/Congestion_management/More_Information_about_the_daily_auction/index.htm, German-Czech (CEPS-TPS) border: http://market.e-trace.biz/offered_capacity.asp, German-Dutch border: www.tso-auction.org/capacity results/default.aspx	Daily	Yes - links for all borders: www.amprion.net/en/forecasts-of-transmission-capacity-available-to-the-market, German-Dutch border on TSO Auction website: www.tso-auction.org/capacity results/default.aspx	Daily Also to come soon on www.casc-cwe.eu/en/Market-data/Daily-Auctions-specifications/Daily-Products	Yes - for German-Swiss border: www.enbw.com/content/de/netznutzer/strom/auktion_d_ch/tagesauktion/index.jsp, for German-French and German-Austrian border, see links above	Day ahead, hourly data	Yes - http://market.e-trace.biz/offered_capacity.asp	Day ahead
Daily intra-day transmission capacity	Yes - for German-Danish and German-Dutch border: www.intraday-capacity.com/portal/php/main.php, German-Czech border: http://market.ceps.cz/intraday_tso_atc_limits.asp, no congestion on German-Austrian border.	Daily	Yes - links for all borders: www.amprion.net/en/forecasts-of-transmission-capacity-available-to-the-market	Daily	Yes - for German-Swiss border: www.enbw.com/content/de/netznutzer/strom/auktion_d_ch/intraday/index.jsp, for German-French and German-Austrian border, see links above	Daily, hourly data	Yes - http://market.ceps.cz/intraday_tso_atc_limits.asp	Daily

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Transparency Criteria	Transpower (E.ON)		Amprion (RWE)		ENBW Transportnetze		Vattenfall Europe Transmission	
	Published?	**Frequency**	**Published?**	**Frequency**	**Published?**	**Frequency**	**Published?**	**Frequency**
Interconnector project info/impact on cross border trade	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Information_on_long-term_development_of_the_transmission_infrastructure/index.htm	Planned projects up to 2020	Yes - www.amprion.net/en/long-term-development-of-the-transmission-system-structure	Ad hoc - last update 12/2007	Yes - through link on this page: www.enbw.com/content/en/system_user/power/market_information/index.jsp to this pdf on long term development of transmission infrastructure: www.enbw.com/content/de/netznutzer/media/pdf/Langfristige_Entwicklung_der_Uebertragungsinfrastruktur.pdf	Ad hoc	Yes - www.vattenfall.de/www/trm_en/trm_en/941233gridx/941395conge/941431cmxgu/index.jsp	Ad hoc
Capacity allocated by market time unit and its usage	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Cross-border_load_flows__Realised_schedules/index.htm	Daily (but three weeks in arrears for capacity allocated)	Yes - Yearly, monthly auctions results: www.casc-cwe.eu/en, daily auction results for each border at: www.amprion.net/en/auctions-germany-france, www.amprion.net/en/auctions-germany-and-switzerland, www.tso-auction.org/, Use/nomination on www.etsovista.org	Yearly, monthly, daily (daily also planned on www.casc-cwe.eu from autumn 2009)	Yes - in auction results for German-Swiss border: www.enbw.com/content/de/netznutzer/strom/auktion_d_ch/index.jsp, links for German-French border: www.enbw.com/content/de/netznutzer/strom/netzengpaesse/f/index.jsp, and at www.casc-cwe.eu/en	Yearly, monthly, daily	Yes - on auction result sites: www.e-trace.biz (for German-Polish-Czech border), www.nordpoolspot.com (for German-Danish border), intraday data for German-Czech border at: http://market.ceps.cz/intraday_statistics.asp	Yearly, monthly, daily

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PLATTS EUROPEAN POWER MARKET TRANSPARENCY ASSESSMENT: GERMANY

TRANSPARENCY TRACKER

Transparency Criteria	Transpower (E.ON) Published?	Frequency	Amprion (RWE) Published?	Frequency	ENBW Transportnetze Published?	Frequency	Vattenfall Europe Transmission Published?	Frequency
Real time update of capacity purchased, price	Yes - on the respective auction websites: www.e-trace.biz, www.eonnetz-eltra-auctions.org, www.casc-cwe.eu, www.tso-auction.org	As soon as available	Yes - see links above	Yearly, monthly, daily	Yes - see above	Yearly, monthly, daily	Yes - see above	Yearly, monthly, daily
Utilization of allocated capacity/capacity nominated	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Cross-border_load_flows__Realised_schedules/index.htm	Daily, but one week in arrears for capacity allocated	Yes - www.etsovista.org/ (Congestion management>Operational>Schedules)	Daily, registration required for Etsovista	Yes - links for all borders in German at: www.enbw.com/content/de/netznutzer/strom/grenz_lastfluesse/index.jsp, also on www.etsovista.org	Hourly, registration required for Etsovista	Yes - www.etsovista.org	Daily, registration required
Reserved balancing capacity	No - TSO says not required in Germany		No - TSO says not required in Ergeg's transparency report for northern Europe		No - TSO says not required in Ergeg's transparency report for northern Europe		No - TSO says not required in Ergeg's transparency report for northern Europe	
Interconnector bids/sales/utilization	Yes - www.etsovista.org, www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Cross-border_load_flows__Realised_schedules/index.htm	As soon as available, registration required for Etsovista	Yes - in auction results eg: www.amprion.net/en/auctions-germany-france	Yearly, monthly, daily	No - TSO says not required in Ergeg's transparency report for northern Europe		Yes - on auction result sites such as www.e-trace.biz, and www.etsovista.org (see before)	Yearly, monthly, daily

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Source: Platts

TRANSPARENCY TRACKER

Transparency Criteria	Transpower (E.ON)		Amprion (RWE)		ENBW Transportnetze		Vattenfall Europe Transmission	
	Published?	Frequency	Published?	Frequency	Published?	Frequency	Published?	Frequency
Interconnector priority bids/sales/utilization	No - TSO says no priority bids/sales or utilizations in Germany		No - TSO says not required in Ergeg's transparency report for northern Europe		No - TSO says not required in Ergeg's transparency report for northern Europe		No - TSO says not required in Ergeg's transparency report for northern Europe	
Capacity calculation								
Description of interconnection congestion management method	Yes - for German-Danish border: www.eonnetz-eltra-auctions.org/, German-Czech border: www.e-trace.biz/2006/index_rules.htm, German-Dutch border: www.tso-auction.org/rulesregulations/default.aspx	Ad hoc	Yes - overview in English for German-French border with EnBW/RTE: www.amprion.net/en/auctions-germany-france, German-Swiss border: www.amprion.net/en/auctions-germany-and-switzerland, German-Dutch border: www.tso-auction.org/	Latest German-French border coordinated auction rules published in English Dec 2007	Yes - overviews in English: www.enbw.com/content/en/system_user/power/grid_congestions/index.jsp with links to details for all borders	Latest German-French border auction rules published in English Dec 2007. German-Swiss border rules published in German in 2007.	Yes - for common borders with Czech Republic, Poland, Slovakia and Transpower: www.e-trace.biz/2006/docs/Auction_Rules_v1_1_2008.pdf and for intraday capacity: www.vattenfall.de/www/trm_en/trm_en/941233gridx/941395conge/941449intra/index.jsp	2008 coordinated auction rules published Nov 2007, intraday rules published Mar 2008
Interconnector capacity calculation method	Yes - for German-Danish border: www.eonnetz-eltra-auctions.org/, for German-Czech border: www.e-trace.biz/2006/index_rules.htm, for German-Dutch border: www.tso-auction.org/faq/capacity/default.aspx	Ad hoc	Yes - as above	Ad hoc	Yes - for German-Swiss border in German: www.enbw.com/content/de/netznutzer/media/pdf/engpass_auktion/Ergebnisse_der_AG_NTC_Version_1_0.pdf, link to RTE site for German-French border, no congestion on German-Austrian border	German-Swiss border method published December 2005	Yes - www.vattenfall.de/www/trm_en/trm_en/941233gridx/941395conge/941503metho/index.jsp	Ad hoc

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PLATTS EUROPEAN POWER MARKET TRANSPARENCY ASSESSMENT: GERMANY

TRANSPARENCY TRACKER

Transparency Criteria	Transpower (E.ON) Published?	Frequency	Amprion (RWE) Published?	Frequency	ENBW Transportnetze Published?	Frequency	Vattenfall Europe Transmission Published?	Frequency
Grid congestion management, capacity allocation method	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Congestion_management/Overview/index.htm	Ad hoc	Yes - auction rules in links above, overview at www.amprion.net/en/congestion-management	Ad hoc	Yes - for German-Swiss border: www.enbw.com/content/de/netznutzer/strom/auktion_d_ch/index.jsp, for German-French border: www.enbw.com/content/de/netznutzer/strom/netzengpaesse/f/index.jsp and at www.casc-cwe.eu/en	Yearly, monthly, daily	Yes - for German-Polish/Czech borders in German only: www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/SetWebsiteLanguage.xml?languagevariantid=ENG&lang=en&targetPage=120.htm. Methodology for implicit auction at German-Danish/East border to be published after regulatory approval	New German-Polish/Czech methodology planned this autumn
Times, procedures for applying for grid capacity	Yes - details for connection only: www.transpower.de/pages/tso_en/Transparency/Publications/Grid_connection/Grid_connection_regulations/index.htm	Ad hoc	Yes - contracts for connection and usage: www.amprion.net/en/grid-connection	Ad hoc, contracts in German only	Yes – under network access at http://www.enbw.com/content/en/system_user/power/network_access/index.jsp	Ad hoc	Yes - www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/106.htm	Ad hoc
Description of products offered	Yes - description of charges: www.transpower.de/pages/tso_en/Transparency/Publications/Network_charges/Overview/index.htm	Ad hoc	Yes - description of charges: www.amprion.net/en/grid-charges	Ad hoc	Yes - explanation of pricing for different grid services available in English at: www.enbw.com/content/en/system_user/power/network_access/price_components/index.jsp	Ad hoc	Yes - www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/126.htm	Yearly

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PLATTS EUROPEAN POWER MARKET TRANSPARENCY ASSESSMENT: GERMANY

TRANSPARENCY TRACKER

Transparency Criteria	Transpower (E.ON) Published?	Frequency	Amprion (RWE) Published?	Frequency	ENBW Transportnetze Published?	Frequency	Vattenfall Europe Transmission Published?	Frequency
Obligations, rights of TSOs and third parties	Yes - details for grid connection: www.transpower.de/pages/tso_en/Transparency/Publications/Grid_connection/Grid_connection_regulations/index.htm	Ad hoc	Yes - details for grid connection: www.amprion.net/en/grid-connection	Ad hoc, details in German only	Yes - details for grid connection: www.enbw.com/content/de/netznutzer/strom/netznutzung/technisch_anschluss/index.jsp	Ad hoc, details in German only	Yes - with grid access details: www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/106.htm	Ad hoc
Network operation								
Network availability/outage data	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Scheduled_and_unscheduled_outages_of_the_transmission_grids_with_market_relevance/index.htm	Ad hoc	Yes - www.amprion.net/en/market-relevant-and-planned-outages#	Ad hoc	Yes - English link to German detail: www.enbw.com/content/en/system_user/power/network_operation/overhauls_transmission_network/index.jsp	Ad hoc	Yes - planned outages at: www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/121.htm, unplanned outages at: www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/122.htm	Ad hoc
Import/Export balance	Yes - www.etsovista.org, www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Cross-border_load_flows__Realised_schedules/index.htm	Hourly/daily	Yes - www.amprion.net/en/cross-border-load-flows#, www.etsovista.org	Daily, on TSO site H+2 on Etsovista	Yes - links for all borders in German at: www.enbw.com/content/de/netznutzer/strom/grenz_lastfluesse/index.jsp, also on www.etsovista.org	1/4-hourly	Yes - TSO says can be calculated from aggregated realised commercial and physical flows per interconnection published on www.etsovista.org	Daily, registration required for Etsovista

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Transparency Criteria	Transpower (E.ON) Published?	Frequency	Amprion (RWE) Published?	Frequency	ENBW Transportnetze Published?	Frequency	Vattenfall Europe Transmission Published?	Frequency
Description of effect of TSOs corrective actions	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Cross-border_load_flows__Realised_schedules/Measures_for_the_rectification_of_network_or_system_problems/index.htm	Ad hoc	No - but TSO says in process	Planned for end-September 2009	Yes - www.enbw.com/content/en/system_user/power/network_operation/failures_and_restrictions_in_Transmission_Network/index.jsp	Latest info from 2008	Yes - www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/SetWebsiteLanguage.xml?languagevariantid=ENG&lang=en&targetPage=157.htm	Ad hoc
Network access procedure	Yes - www.transpower.de/pages/tso_en/Transparency/Publications/Grid_connection/Grid_connection_regulations/index.htm plus ad hoc reports: www.transpower.de/pages/tso_en/Transparency/Publications/Reporting_Service/Network_access/index.htm	Ad hoc	Yes - www.amprion.net/en/grid-customers	Ad hoc	Yes - www.enbw.com/content/en/system_user/power/network_access/index.jsp	Ad hoc	Yes - www.vattenfall.de/www/trm_en/trm_en/941233gridx/941287gridx/index.jsp, grid connection policy: www.vattenfall.de/www/trm_en/trm_en/941233gridx/941269gridx/index.jsp	Ad hoc

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Transparency Criteria	Transpower (E.ON)		Amprion (RWE)		ENBW Transportnetze		Vattenfall Europe Transmission	
	Published?	Frequency	Published?	Frequency	Published?	Frequency	Published?	Frequency
Network use data	Yes - annual peak load and load curve: www.transpower.de/pages/tso_en/Transparency/Publications/Network_figures/Annual_peak_load_and_load_curve/index.htm plus ad hoc reports: www.transpower.de/pages/tso_en/Transparency/Publications/Reporting_Service/Network_access/index.htm	Ad hoc	Yes - www.amprion.net/en/structural-characteristics	April 1 each year	Yes - www.enbw.com/content/en/system_user/power/network_access/network_data_tng/index.jsp	Latest info for 2008	Yes - www.vattenfall.de/cps/rde/xchg/trm_de/hs.xsl/124.htm	April 1 each year
Congestion report - where it exists and why	Yes - for borders only: www.transpower.de/pages/tso_en/Transparency/Publications/Congestion_management/Overview/index.htm	Ad hoc	Yes - www.amprion.net/en/grid-constraints	Ad hoc	Yes - for borders only: www.enbw.com/content/de/netznutzer/strom/netzengpaesse/index.jsp	Ad hoc	Yes - www.vattenfall.de/www/trm_en/trm_en/941233gridx/941395conge/941431cmxgu/index.jsp	Ad hoc

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Transparency Criteria	Transpower (E.ON)		Amprion (RWE)		ENBW Transportnetze		Vattenfall Europe Transmission	
	Published?	Frequency	Published?	Frequency	Published?	Frequency	Published?	Frequency
Network investment and planning								
System maps/grid expansion projects	Yes - quarterly grid development: www.transpower.de/ pages/tso_en/Trans parency/Publication s/Reporting_Servic e/Network_develop ment_and_status/in dex.htm, long term grid development: www.transpower.de/ pages/tso_en/Trans parency/Publication s/Network_figures/I nformation_on_long- term_development_ of_the_transmission _infrastructure/inde x.htm	Ad hoc and quarterly reports	Yes - most detail in German: www.amprion.net/n etzausbau	Ad hoc	No maps but on grid expansion: Yes - through link on this page: www.enbw.com/con tent/en/system_us er/power/market_in formation/index.jsp to this pdf on long term development of transmission infrastructure: www.enbw.com/con tent/de/netznutzer/ media/pdf/Langfrist ige_Entwicklung_der _Uebertragungsinfra struktur.pdf	Ad hoc last update March 2009	Yes - www.vattenfall.de/c ps/rde/xchg/trm_n et/hs.xsl/Netzausb auprojekte.htm	Ad hoc
Planned grid outages	Yes - www.transpower.de/ pages/tso_en/Trans parency/Publication s/Network_figures/ Scheduled_and_uns cheduled_outages_ of_the_transmission _grids_with_market_ relevance/index.ht m	Ad hoc	Yes - www.amprion.net/e n/market-relevant- and-planned- outages#	Ad hoc	Yes - detail in German only: www.enbw.com/con tent/de/netznutzer/ strom/netzbetrieb/r evisionen_ue_netz/i ndex.jsp	Info up to end-2009	Yes - www.vattenfall.de/c ps/rde/xchg/trm_d e/hs.xsl/121.htm	Ad hoc

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