

IBERDROLA'S RESPONSE TO ERGEG DRAFT COMITOLGY GUIDELINES ON FUNDAMENTAL ELECTRICITY DATA TRANSPARENCY (REF: E10-ENM-02-07)

27th October 2010

IBERDROLA welcomes and appreciates the work carried out by ERGEG in order to create such a high quality document about the necessary requirements on Fundamental Data Transparency. We consider this document essential in order to establish a minimum common level of publication of the defined data on a fair and non-discriminatory basis across all Member States. This work will definitely contribute to trigger the discussion of the necessary improvements to be established in order to ensure transparency and market integrity.

From IBERDROLA, we support EFET's response in every of the aspects subject to consultation. However, we would like to add a few more aspects in some of the ERGEGs questions for public consultation that, in our opinion, are key elements to contribute the document reach a better focus on the transparency guidelines needed nowadays throughout all the Member States.

General issues

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

Taking ERGEGs Comitology Guidelines as a starting point, it is established that it should be the TSO the responsible for gathering the information from all the generators, and the responsibility of these last ones is to provide that information to the TSO. Therefore we believe that the timescale needed to implement the Comitology Guideline, as the TSO should have that information already, is a short period of time, as soon as possible in any case.

We also think that, being the TSO the responsible of holding and publishing the data in a central platform, not only will save in time, talking about the issue of this question, the timescale, but it will also mean a costs save as it does not require any additional investment, as it would require if the solution was new ways of publication instead of via the TSO.

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

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

IBERDROLA believes that a more firm specification of roles should be done, both for market participants and for the TSO, by firmly establishing that the generators are responsible for providing the data to the TSO but not for its publication.

In the sense of determining whether a system of penalties should be established or not in case of data manipulation or prolonged non-compliance to transparency provisions, IBERDROLA proposes to establish a system of objective and harmonized indicators on the reliability and correctness of the information provided to the platform. These indicators should be monitored by the regulators, and, overall, by an European Regulatory Agency, so that a level playing field can be achieved in all Member States

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

IBERDROLA agrees with the 3 year storage proposed by ERGEG. We do consider it establishes a sufficient database to be able to develop acceptable historical reports.

We also support EFET when it concerns the form of publication, we agree that download shall be facilitated, the platform shall be available in English and free of charge and it should be possible to download historical data using simple queries.

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

IBERDROLA believes that an hourly basis publication would be enough and sufficient to reach the required level of transparency. A more detailed market time basis could incur in more costs that we believe would not be covered by the benefits from this detailed publication.

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

See answer to question number 2.

Generation

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

Ex-ante information on planned unavailability of generation and ex-post information on planned and unplanned unavailability should be provided at unit level. The Transmission System Operator requires this information to be provided at unit level in order to carry out its duties and thus this information could be provided by the TSO to the central information platform. The costs of data collection will be lower if information is provided by each TSO to the central information platform rather than by each transmission connected generator. This is in line with the reasons stated in our answer to question number two.

It is proposed that ex-ante information on planned unavailability and ex-post information on planned and unplanned unavailability should only be provided for generation units exceeding 100 MW. We support this being the minimum requirement for all Member States and that all generation units over 100 MW are required to provide this information to their TSO. However where a TSO is provided with unavailability information for generation units below 100 MW located in its control area then this information should also be provided to the central information platform by the TSO.

It must be recognised that information provided to the TSO by a transmission connected generator after the start of an unplanned outage on the duration of the unplanned outage can only be an estimate. This estimation would be of course based on the best effort, but it must be taken into account that the generator is only liable to give the best estimation and can not assure the exact information on unplanned outages. If this information is provided promptly by the TSO to the central information platform then the estimated nature of this information should be made clear to parties accessing it from the central information platform.

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

We do not consider appropriate for the TSO to provide the central information platform with actual unit by unit generation output for generation units equal to or greater than 10 MW installed generation capacity, updated as changes occur, at least every 15 minutes. It is not clear that the benefits of having this information provided every 15 minutes can justify the costs of doing so and thus it would be more appropriate to provide this information on an hourly basis.

IBERDROLA thinks that a sound and reliable information about intermittent generation should also be published by the TSO, consisting on aggregated generation forecast and a real-time wind and solar production per bidding area, as this kind of generation can affect significantly the price in a short period of time.