

European Regulators Group
for Electricity and Gas (EREG)
c/o Council of European Energy Regulators (CEER)
Rue de Titien 28
B-1000 Brussels

28.10.2010

Draft Comitology Guidelines on Fundamental Electricity Data Transparency Swissgrid response to public consultation

Dear Sir or Madam,

On behalf of Swissgrid, the Swiss TSO, we are pleased to hereby provide our response to the public consultation on "Draft Comitology Guidelines on Fundamental Electricity Data Transparency".

General issues

Question 1: Are there additional major problems or policy issues that should be addressed by the draft Comitology Guideline on Fundamental Electricity Data Transparency?

Answer 1:

- The guideline should specify how the costs for implementing the transparency requirements are dealt with in general, and especially in the case of TSOs. This includes as well the question of who should bear the costs (end users? market participants?) and how they are recovered.
- The guideline should specify the procedures in case TSOs are not allowed to publish certain information due to national legislation or national regulatory decisions (e.g. prices of balancing resources).

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

Answer 2: 3 to 5 years is a realistic timeframe, considering:

- Swissgrid currently does not have available all the information required by the guideline (e.g. monthly/yearly load, unavailability of consumption units, forecast of wind and solar power).
- Guideline 4.1.3.7-8: To make these data available the national Transmission and Distribution Code have to be amended accordingly. Market participants may not be ready to implement the new demands at short notice.
- Some of the data required by the guideline is not public under the current arrangements in Switzerland (e.g. production per generation unit). Market participants would have to give their previous opposition and to agree to the publication of these data...

Question 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?

Answer 3: TSOs and ENTSO-E should not have any disadvantage if they do not get the necessary input. Therefore a process should be established for the case of non-compliance by market participants not delivering transparency data.

Question 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?

Answer 4: Yes, as there isn't a direct link between market participants and ENTSO-E. In this regard, please also take into account our answer to Question 3.

Question 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?

Answer 5:

- 3 years seem to be sufficient from a cost/benefit perspective. Market data older than 3 years do not have a significant value because of the rapid market developments. If some market participants should need longer-term analyses, they can store the data themselves.
- The guideline states quite clearly that the access to the information should be free. However, it does not say anything on the distribution of costs that TSOs (and market participants delivering data) face (see Answer 1)

Questions 6 and 7: No comment.

Load issues

Question 8: Do you see a need for publication of load data linked to different timeframes or an update of load data linked to different timeframes than those suggested in the draft document?

Answer 8: The total load is available after the end of a month + 25 working days. This is defined in SDAT (Standardised Data Interchange for the Swiss Electricity Market).

Questions regarding definitions:

Does the guideline contain a definition of :

- "relevant data"?
- "hourly actual vertical load"?

What is the meaning of:

- "value" ..of MW of the vertical load?
(Most probably the MW of the vertical load could be published within reasonable time.)

What is the meaning of:

- "the GWh value of the vertical load"?
(The GWh value of the vertical load as a real-time system can't be provided in the proposed time-frame (integration of a value).

Question 9: The draft document suggests that the information on unavailabilities of consumption units is disclosed in an anonymous manner identifying the bidding area, timeframes and unavailable load. Do you consider these pieces of information sufficient for the transparency needs of the internal wholesale electricity market or should also the name of the consumption unit be published?

Answer 9: No comment.

Transmission and Interconnectors

Question 10: Should the publication obligations regarding planned or actual outages of the transmission grid and interconnectors require the publication of the location and type of the asset (i.e. identify the part of transmission infrastructure that due to planned outage or a failure is facing a limitation in its transmission capacity) or should the information on transmission infrastructure equipment outage be non-identifiable? Please justify your position why either identified information would be necessary or why only anonymous information on the transmission infrastructure outages should be published.

Answer 10:

- Transmission grids are generally considered as critical infrastructure, susceptible to terrorist attacks. Therefore, only the publication of anonymous information about the transmission equipment outages is acceptable.

Questions regarding definitions:

Does the guideline contain a definition of

- "interconnector capacity"? (Is "interconnector capacity" maybe equal to "Net Transfer Capacity"?)
- "Asset", Guidelines 4.2.1: What is an "asset" in this context? (Line? Tower? Etc.)

Questions 11 and 12: No comment.

Generation

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

Answer 13: "unit". The information should be given in a common and European-wide harmonised manner. Swissgrid made good experience with the unit-approach. Only a few smaller generating companies asked for the plant-approach for hydraulic close coupled units.

Question 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?

Answer 14: Some of the older, smaller generation units (10-50MW) may not be equipped with real-time measurements and/or data transmission equipment. The needed adaptations could lead to various problems for the generation companies: high costs, technical impracticability, loss of operation permit. Compared to the additional value for the market the effort to provide these data may be considered as inappropriate.

Question 15: The requirement to disclose hourly information on actual aggregated generation output is now related to generation type. Should this threshold be linked to fuel requirements or generation technology?

Answer 15: No comment.

Balancing and wholesale data

Question 16: The transparency requirements on balancing have been widened compared to the Transparency Reports prepared within the framework of the Electricity Regional Initiatives. Is the proposed list of data items sufficient - also taking into account the evolution towards cross-border balancing markets?

Answer 16:

- Overall, please consider that the terms “primary”, “secondary” and “tertiary” reserves are not used in the same manner in the different market design regimes applied across Europe. To have a more harmonized way of publishing information, general terms are defined by the Ad Hoc Team Operational Reserves of ENTSO-E where the different types of balancing energy are defined as:
 - Frequency Containment Reserves;
 - Frequency Restoration Reserves;
 - Replacement Reserves.

Question 17: The transparency requirements on wholesale market data have been deliberately left outside the draft Guidelines as they will most likely be addressed by other legal measures that are currently under preparation. Should some basic wholesale data, i.e. information on aggregate supply and demand curves, prices and volumes for each standard traded product and for each market timeframe (forward, day-ahead, intraday) as well as prices and volumes of the OTC market still be part of the Comitology Guideline on Fundamental Electricity Data Transparency?

Answer 17: No comment.

Best regards,
Swissgrid Ltd.



p.p. Alexander Wirth
Head of European Affairs



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