

# **GEODE position on ERGEG draft GGP on transparency & disclosure of market information**

**Florence Electricity Regulatory Forum  
7 & 8 September 2006**



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## **Aim of ERGEG Guidelines:**

**“To provide market related information to wholesale market participants (suppliers, generators, energy traders, large customers and demand side participants) across Member States”**



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**GEODE** considers market information to be a prerequisite for a well-functioning market.

It is essential that relevant market information is made available to market actors.

The right level of information transparency will benefit transactions, contributing to create a single European Energy market.



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**GEODE holds the opinion that information  
confidentiality should be kept at a minimum.**

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- Market actors should have equal access to the same information to participate in the market on equal and fair conditions, especially information that may influence the market price.

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It is important that information on transmission capacity – including capacity on interconnections- is available to all market actors, as transmission capacity availability has a similar effect on prices as production capacity availability.

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- TSO's should publish information on the state of national power systems close to real time.
- TSO's should develop a uniform structure for this information by using best practices from the different countries.

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- Harmonised market information should be available in neighbouring power markets.
- The aim should be to create equal terms for actors on both sides of the market borders.

# **GEODE position on ERGEG draft GGP on transparency & disclosure of market information**

**GEODE** considers the aggregation level of data determines for DSO' s an administrative burden that is likely to increase with the level of detailed information requested to market participants.

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**GEODE** proposes to limit the level of detailed information requested, if the costs reflect unfavourably in the distributor costs

or,  
as the ERGEG Guidelines proposes, when there is  
“*a proven fact that the cost of providing the information is significantly higher than the expected benefit*”.

# GEODE position on ERGEG draft GGP on transparency & disclosure of market information

- **GEODE** asks the following aspects to be taken in consideration in the ERGEG guidelines :
  - Further clarification of the management of confidential data requirements at European level, to avoid differences between national markets.
  - Increased coordination between TSO's and other market parties involved, to ensure the fulfillment of any transaction at EU-level.

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- **GEODE** asks the following aspects to be taken in consideration in the ERGEG guidelines:
  - any additional administrative burden to DSO's - arising from fulfilling requirements on information transparency - will reflect financial costs that have to be recovered by the distributor through distribution tariffs.