

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

Florence Electricity Regulatory Forum
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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.

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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”.

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- **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.