

**bne-Statement on:**

**Public consultation document  
Guidelines on fundamental Electricity data transparency**

**Answers to Questions:**

Q1: No, all relevant policy issues in the scope of the advice have been addressed.

Q2: Yes, the definitions are clear enough and complete.

Q3: An aggregated form of publishing the data would be adequate, if information about the region of the unavailability is published. Regions should in this case be defined along network restrictions. The data should enable market participants to understand the consequences of planned or unplanned unavailabilities on NTC or other corrective measures by the network operator.

Q4: A publication per balancing zone is not adequate, as it would not enable market participants to understand the implications of the unavailabilities on NTC or other corrective measures of the network operator and anticipate their operations accordingly. A publication per production type is not adequate, as the technical – and thus the economic – characteristics of the production units are quite different, e.g. differing with the age of the unit. Market participants would therefore not be able to understand the implications on market price. We do not believe, that the unit-by-unit publication will create competition problems that are beyond today's problems. In that sense, the unit-by-unit publication will improve competition.

Q5: The hourly update is essential to foster the intraday-market. Any longer time-period would deteriorate the information needed to make rational decisions in the intraday-market, therefore increase risks and weaken competition in this market. Please also see Q4.

Q6: No.

### **Further comments:**

In section 4.2.1 the provisions read: "This information must be given for projects with a relevant effect on transfer capability (NTC) between bidding areas. A relevant effect is considered to be an effect that equals or exceeds 100 MW at least during one market time unit." This wording would imply, that several projects with less than 100 MW effect on the NTC per project would not be published. The sum of the effects on the NTC of all projects could be higher than 100 MW per time unit and therefore have relevance for the market. In that occurrence, an aggregate of these measures should be published.

In section 4.3.2.10 the ex-ante forecast of wind and solar power is to be published by 18h00 D-1. This information is far too late for adequate reactions of the market participants on the day-ahead market. In case of very high wind or solar power availability or in case of very low availability, other generation has to be reduced or increased. This reaction should be mapped in the decisions of the day-ahead market in order to achieve an efficient allocation. A consistent market-wide information is essential to trigger the adequate reaction on the day-ahead market.

**Berlin, 16.09.2011**