

Swissgrid response to the European Commission's public consultation on the Guidelines on Fundamental Electricity Data Transparency

European Commission
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Belgium

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Dear Sir or Madam,

As Switzerland's independent national grid company, Swissgrid is responsible for the safe, reliable and cost-effective operation of the country's transmission system. Swissgrid is also responsible for coordination and grid usage in the cross-border exchange of electricity with its European neighbours and an active member of the European Network of Transmission System Operators for Electricity (ENTSO-E). For nearly 60 years, Switzerland has held the role of the "Coordination Centre South" which includes France, Spain, Portugal, Italy, Austria and the countries of Southeast Europe. Switzerland is connected to its European neighbours with more than 30 transmission lines that transport 11% of total electricity exchanged between the ENTSO-E countries in continental Europe. Swiss infrastructure, such as the transmission grid and hydro storages, has been a historic corner stone for energy trading and will play a vital role for the future Internal Energy Market.

On behalf of Swissgrid, we are pleased to provide our response to the European Commission's public consultation on the Guidelines on Fundamental Electricity Data Transparency.

Question 1: Do you have any major problems or policy issues related to transparency which go beyond ERGEG's advice and which you think should be addressed in the Commission's proposal?

We welcome the establishment of a transparency platform as a vital means to provide a level playing field for market actors. However, providing this platform will cause initial costs to set it up as well as operating costs on behalf of the data providers and the operator of the platform. The guideline should detail how these costs will be covered.

Question 2: Do you consider that definitions are complete and clear enough to avoid any potential problems when applied?

No comment.

Question 3: Points 4.1.3.7 and 4.1.3.8 of ERGEG's guideline require publishing ex-ante information on planned and ex-post information on the unplanned unavailability of consumption units including the name of the consumption units, location, bidding area, available capacity during the event, installed capacity, etc. Do you consider that publishing this information on a unit-by-unit base would be likely to create any competition concerns (e.g. because of the commercially sensitive nature of information on energy consumption of individual companies)? If yes, for which industries, in which Member States, etc.? How does this concern relate to the potential benefit this information yields to participants of traded electricity markets? Could this concern be remedied in a way which would nevertheless enable market participants to properly assess such an important change in a demand fundamental (e.g. by publishing data in

aggregated form)?

We believe that the provision of aggregated consumption data per bidding area is sufficient to provide market actors with information on which to base their market expectations. We believe that the provision of detailed information on the consumption units does neither improve traders' ability to predict market developments nor will it contribute to levelling the playing field for market actors. On the contrary, evaluating and interpreting the detailed information might put smaller players who cannot dedicate a lot of resources to this task at a disadvantage.

Question 4: Points 4.3.2.4 and 4.3.2.5 of ERGEG's guideline require publishing ex-ante information on planned and ex-post information on the unplanned unavailability of generation units including the name of the generation units, location, bidding area, available capacity during the event, installed capacity, etc. Do you consider that publishing this information on a unit-by-unit base would be likely to create any competition concerns? If yes, how does this concern relate to the potential benefit this information yields to market participants? Could this concern be remedied in a way which would nevertheless enable market participants to properly assess such an important change in a supply fundamental (e.g. by publishing data in aggregated form, for instance per production type and balancing zone)?

Further to the evaluation of question 3, the publication of detailed data on generation units is problematic because small producers might face disadvantages in case they need to cover an unexpected shortage on short notice and other market actors are aware of their precarious situation.

The ex-ante information on planned generation, however, should be aggregated per fuel used (i.e. coal, lignite, gas, nuclear, hydro etc.) since the type of generation can have an impact on prices.

Question 5: Point 4.3.2.8 of ERGEG's guideline requires publishing actual unit-by-unit generation updated every hour. Do you consider that hourly publishing this information on a unit-by-unit base would be likely to create any competition concerns (e.g. by increased possibilities to monitor the behaviour of competitors, to enter into collusive strategies)? If yes, how does this concern relate to the potential benefit this information yields to market participants? How in your view could the concern be remedied (e.g. by publishing data in aggregated form, for instance per production type and balancing zone and/or by publishing with a longer delay than one hour)?

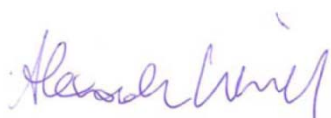
Even though we deem the impact of ex-post publication of the generation data less critical than the ex-ante information, we do not see the benefit of publishing the details of individual generation units for the market.

Question 6: Do you see any other issues arising from ERGEG' proposal which may in your view give rise to competition concerns?

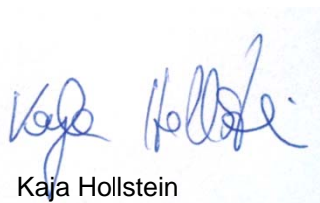
No comment.

Best regards,

Swissgrid Ltd.



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Head of European Affairs



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