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The Danish Competition and Consumer Authority's response to the public consultation on 'Guidelines on Fundamental Electricity Data Transparency'.

The ERGEG Advise calls for increased transparency in the European electricity market. Regarding transparency in the Nordic region most recommendations in ERGEG's guidelines are already fulfilled.

Data for the electricity transmission infrastructure and market fundamentals are publicly available in real time and in forecasted values mainly on the exchange Nordpoolspot.com and partly on Energinet.dk (the latter is the Danish TSO).

Forecast data, however, is not available in more than day-ahead values with regards to production data. The Danish Competition and Consumer Authority do not consider this a problem, since there appears to be a well-functioning private market for forecasting. Further, the Danish Competition and Consumer Authority does not see a possibility for making a simple and authoritative forecast for a timeframe corresponding to the one in the guidelines (up to one year ahead), which makes forecasting unsuitable for regulation. This hinges among other things on the relatively high level of wind power production in the Nordic region where weather forecasts are of significant importance. In conclusion the Danish Competition and Consumer Authority cannot recommend regulation on long run forecasting of production data. On a contrary regulation might destroy the private market for forecasts.

The experience with public access to market data on aggregated form in the Nordic region have brought more favourable effects than damaging effects. However, data on more detailed form should be made public with caution, as this could lead to anti-competitive behaviour.

The transparency in the Nordic region has been a source of great satisfaction among energy market operators. The Danish Competition and Consumer Authority would therefore recommend a similar transparency in other European countries.

**DANISH COMPETITION AND
CONSUMER AUTHORITY**

**MINISTRY OF ECONOMIC AND
BUSINESS AFFAIRS DENMARK**

Kind regards

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