

DRAFT RESPONSE TO EU CONSULTATION “GUIDELINES ON FUNDAMENTAL ELECTRICITY DATA TRANSPARENCY”

GENERAL COMMENTS

EDSO for Smart Grids welcomes and supports the ERGEG comitology guidelines on fundamental electricity data transparency as it recognizes that transparency is key to foster an efficient and integrated European wholesale electricity market.

EDSO for Smart Grids fully supports the path towards a common EU transparency platform to improve availability of data and enhance competitiveness in European wholesale markets. Nevertheless, roles and responsibilities should be further investigated and DSOs should be given a more important role alongside TSOs when it comes to data collecting.

EDSO for Smart Grids invites the European Commission to take into further consideration the role that DSOs can play and to further investigate who is responsible for collecting specific set of data, considering the different conditions in different member states and the fact that most data are provided to the TSOs by DSOs.

QUESTIONS

- 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?**

If a too stringent approach is taken towards network operators, data protection and privacy issues could endanger the sharing of relevant information and thus hampering the improvement regarding the transparency of the European internal energy market as addressed in the draft guidelines on fundamental electricity data transparency.

- 2. Do you consider that definitions are complete and clear enough to avoid any potential problems when applied?**

Clearer definitions and responsibilities should be provided in particular when it comes to the role that other actors play in providing information and other services to the TSOs, the draft guidelines is underrating the role that DSOs can play in this regard. It is worth recalling that DSOs are responsible for large data volumes and the data security and privacy provisions that need to be put in place when dealing with the information; DSOs support and define rules for the introduction of distributed storage, provide real-time access to energy balancing data and coordinate energy dispatching on distribution grids.

- 3. Points 4.1.3.7 and 4.1.3.8 of ERGEG’s guidelines 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 important change in a demand fundamental (e.g. by publishing data in aggregated form)?

4. Points 4.3.2.4 and 4.3.2.4 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)?
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 concern (e.g. by increased possibilities to monitor the behaviour of competitors, to enter into collusive strategies)? If yes, how 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)?

Overall, the more data that can be made available to suppliers and ESCOs the more competitive the market will be, to the benefit of consumers. As a consequence, the performance of the energy sector is reflected more transparently, the right signals can be given to involved actors and further steps will be taken towards a more integrated European internal market.

Providing data with in great detail could however endanger competition. In this regard it could be recommendable, when providing data for energy balancing purposes, that they are made available in aggregated form to ensure that signals are sent to the market.

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

Coherence and coordination between already existing platform and national rules should be ensured to avoid inconsistencies and overlaps that could endanger the performance of the system and consequently the information exchange. EDSO for Smart Grids recognises the leading role ENTSO-E could play in running a central European information platform but it must be ensured that all interested stakeholders are involved, particularly DSOs.

Finally, the implications of these guidelines in each national context should be carefully assessed with national regulators and competition authorities before adoption through the comitology procedure.