

Malta's Replies to the Public Consultation 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?

In principle, Malta has no major issues with regard to ERGEG's advice. However, there is a substantial amount of data from a number of sources that has to be submitted within very tight stipulated timeframes. How will failure to submit this data be handled to ensure smooth operation?

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

Malta would like to suggest that the definition of 'generation unit' could be improved. Currently, this is defined as "a single electricity generator belonging to a production unit". In this regard, Malta believes that a reference to the actual connection to the grid may be inserted in order to avoid having to report a number of small units which have a common connection to the grid.

Malta also believes that the term 'power transfer distribution factor (PTDF)' should be defined.

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)?

Malta believes that publishing this information on a unit-by-unit basis would be likely to create competition concerns.

Provision of this information would affect industries in general as this would provide insight on the associated production levels, which is not the purpose of providing this data. In general this concern would be valid for all Member States.

Individual data on consumption units will not provide extra benefits to participants. The potential benefit to participants would still be available if the information is provided in aggregate form.

Yes, Malta believes that this concern may be remedied through publishing data in aggregated form.

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)?

Malta believes that publishing this information on a unit-by-unit basis would be likely to create competition concerns.

Information on planned unavailability of generation units can help market participants better judge the available capacity. On the other the ex-post information on the unplanned unavailability of generation units can explain how the market reacted. Nonetheless market participants can still have these benefits if the data is published in aggregate form by bidding area.

Malta believes that the publishing of data in aggregated form could avoid such commercially sensitive situations.

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)?

Malta believes that publishing this information on a unit-by-unit basis would be likely to create competition concerns.

Market participants would still have benefits if the information is published in aggregate form besides that publishing such detailed information may increase the administrative burden on operators unnecessarily without gaining extra benefit to the market participant.

Malta believes that the publishing of data in aggregated form could avoid such commercially sensitive situations.

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

Malta believes that all the data should be uploaded at the same time on the central information platform to avoid that one generator takes a decision based on the data already submitted by its competitor.