

Iberdrola Response to EC Enhanced data transparency on electricity market fundamentals

IBERDROLA welcomes and appreciates the work carried out by EC in order to establish a minimum common level of publication of the defined data on a fair and non-discriminatory basis across all Member States. We believe that symmetry and level playing field principles justify applying these requirements to all markets, boosting long-term competition benefits and participation of new market entrants.

We would like to express our concerns about (just) some of the questions of the EC public consultation:

- **Question 3** (ex-ante information on planned and ex-post information on the unplanned unavailability of consumption units)

Although Iberdrola supports the level of transparency proposed by EC, understands that individual companies can consider that information on its energy consumption is commercially sensitive.

If the data are published in aggregated form as a second option, the information should be published by voltage level, type of customer and location.

- **Question 4 & 5** (ex-ante information on planned and ex-post information on the unplanned unavailability of generation units and actual unit-by-unit generation updated every hour)

Iberdrola supports the level of transparency proposed by EC as units can impact differently in the market. However, we could accept that data were published in aggregated form as a second option.

Besides, even if the immediate information about unplanned unavailability is based on the best effort and the generator is only liable to give the best estimation, it could be compensated for the benefits of immediate transparency.

We do not see risk that players enter into collusive strategies. On the contrary, to monitor the behavior of competitors can have more benefits for competition because reduces the possibilities of market manipulation of one player using strategic behavior, because the rest of players will react.