
Overlaps between Transparency Regulation (TR) and Electricity Balancing Guideline (EB GL)

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In accordance with Commission Regulation (EU) No 543/2013 of 14 June 2013 (TR) Article 5 and Commission Regulation (EU) No 2017/2195 of 23 November 2017 (EB GL) Article 12.5, ENTSO-E has revised and amended the Manual of Procedures for its central Transparency Platform, taking into account the new publication requirements foreseen under EB GL Article 12. During this process, several overlaps between publications mandated by the TR and the EB GL have been identified.

Therefore, the purpose of this paper is to gather the opinion of ENTSO-E Transparency User Group (ETUG) members on the identified overlaps, and in particular to confirm that the correlated/alternative publications on the central Transparency Platform proposed in this paper still achieve the intent of both regulations.

Rules on balancing (TR article 17.1.a) and Terms and Conditions (EB GL article 12.3.g)

The Rules on balancing are deemed a sub-set of the Terms and Conditions. Therefore, the intention of ENTSO-E is to include the *Rules on Balancing* required by the Transparency Regulation under the *Terms and Conditions* required by the EB GL once they have been drafted, avoiding potential overlaps of identical sets of information on the platform.

Accepted aggregated offers (TR article 17.1.d) and Total volume of offered balancing energy bids (EB GL article 12.3.e.ii)

No meaningful distinction could be identified between “aggregated” and “total volume” and “bids” is deemed equivalent to “offers”.

However, some degree of uncertainty still remains whether “accepted” in article 17.1.d shall be interpreted as referring to *offered energy* or *activated energy*.

ENTSO-E believes that EB GL article 12.3.e offers a more accurate description of the requirement and seems to clarify the abovementioned ambiguity. As a result, ENTSO-E deems the publication of the EB GL requirement as more complete and more accurate compared to the Transparency Regulation requirement and therefore suggests the substitution of the first with the latter.

Volumes of activated balancing energy (TR article 17.1.e) and Total volume of activated balancing energy bids (EB GL article 12.3.e.iii)

ENTSO-E believes that the requirements set in these two different articles are actually the same because the aggregation of activated balancing energy bids effectively constitutes the volume of activated balancing energy.

On top of this, the publication under EB GL article 12.3 is more complete as it also offers the possibility to provide additional granularity per standard/specific products.

As a result, ENTSO-E deems the publication of the EB GL requirement more complete and efficient compared to the Transparency Regulation requirement and suggests its substitution.

Maximum and minimum prices of exchanged bids and offers in cross-control area balancing (TR article 17.1.j) and Prices paid by TSO for activated balancing energy (TR article 17.1.f)

With regard to the definition of ‘Cross-control area balancing’, the Transparency Regulation Art. 2.9 states that ‘Cross-control area balancing’ means a balancing scheme where a TSO can receive bids for activation coming from other TSOs’ areas.

Although the concept of ‘cross-control area balancing’ is not defined in the EB GL, chapter 2 of the EB GL describes the requirements for the European Platforms for the exchange of balancing energy, which include a more comprehensive elaboration of the abovementioned balancing scheme.

Furthermore, about the requirement in article 17.1.j to publish maximum and minimum prices of exchanged bids and offers per procurement time unit, in the revised MoP (version 3.1) ENTSO-E proposes the publication of separate prices for standard and specific products under Transparency Regulation article 17.1.f. (prices paid by the TSO for activated balancing energy per balancing time unit and per type of reserve).

As a result, the prices of the standard products as determined by the European Platforms will be published under TR article 17.1.f and not under 17.1.j as the latter is deemed outdated considering the introduction of the European Platforms for the exchange of balancing energy.

Volumes of exchanged bids and offers in cross-control area balancing (TR article 17.1.j) and Total volume of offered balancing energy bids (EB GL article 12.3.e.ii)

According to ENTSO-E, the requirement in article 17.1.j of the Transparency Regulation to publish the volumes of exchanged bids and offers in cross-control area balancing per procurement time unit coincides with the requirement set in art. 12.3.e.ii of the EB GL to publish the total volume of offered balancing energy bids separately per type of reserves.

ENTSO-E notes that the aggregated volume of offered balancing energy bids that will be submitted as standard products to the European platforms will be published on the Transparency Platform under EB GL article 12.3.e.ii. That publication is deemed to fulfil also the objective of TR article 17.1.j.

Volume of balancing energy activated in cross-control area balancing (TR article 17.1.j) and Total volume of activated balancing energy bids (EB GL article 12.3.e.iii)

According to ENTSO-E, the requirement in article 17.1.j of the Transparency Regulation to publish the volume of balancing energy activated in the concerned control areas coincides with the requirement set in art. 12.3.e.iii of the EB GL to publish the total volume of offered and activated balancing energy bids separately for standard and specific products.

ENTSO-E notes that the aggregated volume of balancing energy submitted as standard products to the European platforms and selected for activation will be published on the Transparency Platform under EB GL article 12.3.e.iii. That publication is deemed to fulfil also the objective of TR article 17.1.j.

Conclusion

With the revised Manual of Procedures v3r1 and for the reasons stated above, ENTSO-E suggests that the following publications under TR shall be phased out, due to the entry into force of the EB GL:

Article 17.1.a, Article 17.1.d, Article 17.1.e and Article 17.1.j.

ANNEX: Summary of requirements

Overlaps in Transparency Platform Regulation & Electricity Balancing Regulation requirements:

Transparency Regulation (n.543/2013)	Electricity Balancing Regulation (n. 2195/2017)
<p>Art. 17.1.a: For their control areas, TSOs or where applicable operators of balancing markets, where such markets exist shall provide the following information to the ENTSO for Electricity: (a) Rules on balancing including:</p> <ul style="list-style-type: none"> – processes for the procurement of different types of balancing reserves and of balancing energy, – the methodology of remuneration for both the provision of reserves and activated energy for balancing, – the methodology for calculating imbalance charges, – if applicable, a description on how cross-border balancing between two or more control areas is carried out and the conditions for generators and load to participate; 	<p>Art. 12.3.g: Each TSO shall publish the following information as soon as it becomes available: (g) The initial terms and conditions related to balancing referred to in <i>Article 18</i> at least one month before the application and any amendments to the terms and conditions immediately following approval by the relevant regulatory authority in accordance with Article 37 of Directive 2009/72/EC;</p> <p>(Art. 18: Terms and conditions related to balancing)</p>
<p>Art. 17.1.d: For their control areas, TSOs or where applicable operators of balancing markets, where such markets exist shall provide the following information to the ENTSO for Electricity: (d) accepted aggregated offers per balancing time unit, separately for each type of balancing reserve;</p>	<p>Art. 12.3.e.ii: Each TSO shall publish the following information as soon as it becomes available: (e) aggregated information on balancing energy bids no later than 30 min after the end of the relevant market time unit, which shall include: (i) total volume of offered balancing energy bids; (ii) total volume of offered balancing energy bids separately per type of reserves; (iii) total volume of offered and activated balancing energy bids separately for standard and specific products; (iv) volume of unavailable bids separately per type of reserves;</p>
<p>Art. 17.1.e: For their control areas, TSOs or where applicable operators of balancing markets, where such markets exist shall provide the following information to the ENTSO for Electricity: (e) the amount of activated balancing energy (MW) per balancing time unit and per type of reserve;</p>	<p>Art. 12.3.e.iii: Each TSO shall publish the following information as soon as it becomes available: (e) aggregated information on balancing energy bids no later than 30 min after the end of the relevant market time unit, which shall include: (i) total volume of offered balancing energy bids; (ii) total volume of offered balancing energy bids separately per type of reserves; (iii) total volume of offered and activated balancing energy bids separately for standard and specific products; (iv) volume of unavailable bids separately per type of reserves;</p>

Transparency Regulation (n.543/2013)	Transparency Regulation (n.543/2013)
<p>Art. 17.1.j: For their control areas, TSOs or where applicable operators of balancing markets, where such markets exist, shall provide the following information to the ENTSO for Electricity: (j) if applicable, information regarding Cross Control Area Balancing per balancing time unit, specifying:</p> <ul style="list-style-type: none"> – the volumes of exchanged bids and offers per procurement time unit, – maximum and minimum prices of exchanged bids and offers per procurement time unit, – volume of balancing energy activated in the control areas concerned. <p>Operators of balancing markets shall be considered as primary owners of the information they provide.</p>	<p>Art. 17.1.f: For their control areas, TSOs or where applicable operators of balancing markets, where such markets exist, shall provide the following information to the ENTSO for Electricity: (f) prices paid by the TSO for activated balancing energy per balancing time unit and per type of reserve; price information shall be provided separately for up and down regulation;</p>

Transparency Regulation (n.543/2013)	Electricity Balancing Regulation (n. 2195/2017)
<p>Art. 17.1.j: For their control areas, TSOs or where applicable operators of balancing markets, where such markets exist, shall provide the following information to the ENTSO for Electricity: (j) if applicable, information regarding Cross Control Area Balancing per balancing time unit, specifying:</p> <ul style="list-style-type: none"> – the volumes of exchanged bids and offers per procurement time unit, – maximum and minimum prices of exchanged bids and offers per procurement time unit, – volume of balancing energy activated in the control areas concerned. <p>Operators of balancing markets shall be considered as primary owners of the information they provide.</p>	<p>Art. 12.3.e.ii: Each TSO shall publish the following information as soon as it becomes available: (e) aggregated information on balancing energy bids no later than 30 min after the end of the relevant market time unit, which shall include:</p> <ul style="list-style-type: none"> (i) total volume of offered balancing energy bids; (ii) total volume of offered balancing energy bids separately per type of reserves; (iii) total volume of offered and activated balancing energy bids separately for standard and specific products; (iv) volume of unavailable bids separately per type of reserves;
<p>Art. 17.1.j: For their control areas, TSOs or where applicable operators of balancing markets, where such markets exist, shall provide the following information to the ENTSO for Electricity: (j) if applicable, information regarding Cross Control Area Balancing per balancing time unit, specifying:</p> <ul style="list-style-type: none"> – the volumes of exchanged bids and offers per procurement time unit, – maximum and minimum prices of exchanged bids and offers per procurement time unit, – volume of balancing energy activated in the control areas concerned. <p>Operators of balancing markets shall be considered as primary owners of the information they provide.</p>	<p>Art. 12.3.e.iii: Each TSO shall publish the following information as soon as it becomes available: (e) aggregated information on balancing energy bids no later than 30 min after the end of the relevant market time unit, which shall include:</p> <ul style="list-style-type: none"> (i) total volume of offered balancing energy bids; (ii) total volume of offered balancing energy bids separately per type of reserves; (iii) total volume of offered and activated balancing energy bids separately for standard and specific products; (iv) volume of unavailable bids separately per type of reserves;