Transparency Stakeholder Expert Group (TSEG) Meeting 1 Minutes

Date: 31 January 2013
Place: ENTSO-E office

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| Participants |  |  |  |
|  | Adeline Lassource |  Florence School of Regulation, EUI |  | Kaija Niskala | ENTSO-E |
|  | Alain Taccoen | ENTSO-E |  | Marcus Mittendorf | EEX |
|  | Alexander Koistinen | ENTSO-E |  | Mark Csete | ENTSO-E |
|  | Alison Wedgwood | ENTSO-E |  | Mireille Tshibwabwa | Electrabel |
|  | Andy Spiceley | ENTSO-E |  | Natalie Frank | EPEX SPOT |
|  | Bernhard Walter  | EnBW Trading GmbH |  | Nicolas Roger-Machart | ENTSO-E |
|  | Cris Cotino | ENTSO-E |  | Nora Szabo | ENTSO-E |
|  | Dalius Sulga | ENTSO-E |  | Pavel Vagner | ENTSO-E |
|  | Emmanuel Renvoise | ENTSO-E |  | Peter Campbell | ENTSO-E |
|  | Fillip Sleeuwagen | EFET |  | Peter Claes | IFIEC |
|  | Frederik Johnsen | CASC |  | Peter Schmid  | Tiroler Wasserkraft AG |
|  | Ingmar Bergsten  | Vattenfall |  | Ralf Uttich | Eurelectric |
|  | Ioannis Retsoulis | ENTSO-E |  | Sven Kaiser | ACER |
|  | Jean Noel Marquet | EDF |  | Vassil Petev | Bulgarian PV Association  |
|  | Jean Trzcinski | Sia Partners |  | Jan Radesinsky | CAO |
|  | John Lucas | [ELEXON](http://www.elexon.co.uk/) |  | Christian Elste | E.ON Energy Trading SE |

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1. Approval of Agenda

The agenda is approved

1. Terms of Reference

ENTSO-E presents slides on the terms of reference including the purpose of the expert group, the scope of the tasks for the expert group, the role of participants and ENTSO-E, publication of information and the records of meetings.

The stakeholder group comments that the following should be included in the ToR:

* The expected timeline for the development of the manual of procedures
* Possibly modify the sentence …*shall not be bound to accept any suggestion provided by any stakeholder….*

The members list should be checked. It was also suggested that as it is a large group, it may be difficult to find common meeting dates therefore ENTSO-E is asked to provide telco/web conf facilities for the next meetings.

* Action (ENTSO-E) - Update the Terms of reference and circulate with the minutes for final approval
* **Action (ENTSO-E) -** Arrange telco/web conf facilities for the next meeting
1. Draft Manual of Procedures

ENTSO-E introduces the aims and objectives of the manual of procedures, the scope and proposed structure.

The manual will be developed specifying what is mentioned in Article 5 of the draft Regulation and will be developed under open and transparent consultation with stakeholders.

The content is described in some more detail including the Business Requirements Specification (BRS), the implementation Guides, the technical criteria for data providers and production types.

A question was asked to confirm what was in scope of the Manual of Procedures and what was out of scope? E.g. not in scope – anything considered to be confidential to ENTSO-E (such as contracts with IT suppliers), in scope – data security.

Clarification was sought on what was meant by ‘only the on-line copy will be definitive’? Response: Any downloaded pdf copies might not be valid some weeks/months after downloading, so only the on-line copy could be considered up to date.

There are short presentations and discussion on the data types, including Load, Generation, Transmission and Balancing highlighting the key requirements and identifying potential points for clarification or future discussion by the Stakeholder Expert Group.

It was mentioned that the descriptions of data should clarify ambiguity found in the regulation, for example, units for energy values in balancing (Art 17).

Some comments raised are as follows:

* Ensure consistency of terms used (e.g. bidding zone vs bidding area)
* There was a question about whether harmonisation was always required, or whether local rules will apply? Response: we don’t want to incur disproportionate costs, so local rules could be used.
* There was discussion about the ability of consumption units to provide data, and it was confirmed this would most likely be provided in aggregated form, but this could be discussed in future to be clear what is required of consumption units.
* A question was raised about whether generators or TSOs are the owners of forecast margin (e.g. if a power plant is offering, for example pumped storage, to the balancing market, they won’t know if the TSO will be using the facility, so the TSO should provide the data). Response: the definition will be more closely examined to see which participant needs to provide the case.
* As the presentation had mentioned the aim of avoiding double reporting, there was a question about how participants would know what information is already reported. Response: Agreements need to be formalised in contracts.
* It was noted that there are two thresholds: 100MW and 200MW
* ENTSO-E mentioned the possibility to disclosure additional information using "free text" in the case for UMM.
* Action (ENTSO-E and all) - ENTSO-E will send on 4th February a draft detailed description of data to stakeholders for comments before 22 February.
* Action (All) - ENTSO-E asks that experts send example of lists of production types as required by the Regulation if they already use one (deadline 22 February).
* Action (All) - ENTSO-E asks that experts to send an opinion on what the technical criteria should be for data providers before 22 February).
1. Stakeholder Expert Group Key Comments

There is a round table for key stakeholder comments which are summarised below. Some comments have been grouped to avoid duplication,

1. Roles and responsibility must be clearly defined
2. The manual may produce another variant of reporting standards. There is a risk of having more burdens on cost and efficiency.
3. No need for another data collection method. i.e. reporting should not be duplicated,
4. The data owners should not be responsible for errors in sending the information,
5. There are high IT development costs for delivering the data to the collector,
6. There should be a clear timeline for the project, the amount of documentation seems very ambitious. Cautions that rushing the implementation will cost more in the long term,
7. A list on the ENTSO-E platform of who complies with the requirements for being data provider should be made to have the same level playing field for everybody,
8. There should be both a top down & bottom up approach for requirements of the platform. It should be cost efficient,
9. Regional platforms are a good starting point,
10. Fall back solutions – e.g. If used for market monitoring (REMIT) the platform must be near 100% available,
11. Data security & confidentiality must be considered,
12. Will data from entsoe.net be available on the new platform ?
13. Cost efficiency – use of existing platforms ?
14. Impact on competition ,
15. The Manual of Procedures version for consultation should be quite stable,
16. There should be a feasibility assessment of the timely collection of data,
17. Historical data provided for 5 years. What is foreseen for accessing data older than this ?
18. Generation types – how do we classify these types ?
19. Who will be responsible for the evolution of manual of procedures ?
20. Clarity on thresholds 100MW etc.. For data owners.
21. Actual generation – wind/solar/hydro – who will be responsible for the measurement? TSO/Generator?
22. Who is responsible for aggregation?
23. Who will pay for investment required at DSO/local level?
24. There is a need to bring in DSO concerns on the implementation of the Transparency Guideline.
25. It is useful to have a cost/benefit approach to any further specification.
26. No requirement to send older data before EMFIP is established
27. A list on the ENTSO-E transparency platform of who complies with the data provider requirements (including TSOs) should be made to have the same level playing field for everybody.
28. Next Steps and AOB

4 Feb ENTSO-E sends detailed descriptions of data and is calling for inputs regarding the production types and criteria for being data provider.

22 Feb Stakeholders to answer ENTSO-E requests.

28 Feb 2nd TSEG meeting

Mid Mar 1st draft Manual of Procedures

21 Mar 3rd TSEG meeting

23 Apr 4th TSEG meeting

May Consultation draft for internal approval

May/June - Public consultation (following the publication of the final regulation) Duration ≈1-2 months

* Draft for final comments and internal approval
* Send draft to ACER as soon as possible (within 4 months of entry into force)
* Feedback and amendment before publishing
* Action (All) – Stakeholders are asked to confirm availability for the proposed next meeting dates.
* **Action (ENTSO-E) -** Circulate minutes next week for comment by 12 February.

Dates for the next TSEG meetings:

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|  | **Date** | **Location** |
| ~~Meeting 1~~ | ~~31 January~~ | ~~Brussels~~ |
| Meeting 2 | 28 February | Brussels |
| Meeting 3 | 21 March | Brussels |
| Meeting 4 | 23 April | Brussels |

There has been a new section added for information on the ENTSO-E web site.

<https://www.entsoe.eu/data/entso-e-transparency-platform/>