Public consultation taking place from 19 October to 17 November 2017

Questionnaire on the market operators' assessment of the transparency of the freely available information on the wholesale gas and electricity markets

Note

This questionnaire follows on from the non-confidential study (F) 1637 of 5 Octoberr 2017 published on the CREG website and is intended for all market operators

The meaning of some of the acronyms and explanations of the legislation can be found in the above-mentioned non-confidential study

The responses to this questionnaire must reflect your experience or that of your business

Information on the market operator

1 What are your contact details

Company: Centrica Energy Limited

2 In which other countries are you involved in the gas and electricity markets? (several responses can be given)

Germany
England
France
Luxembourg
Netherlands

Other countries:

3 Are you an operator in the energy markets? (several responses can be given)

Supplier
Stock exchange/broker
Transmission manager
Storage manager
Distribution manager
LNG manager
Platform manager (ENTSO, GIE, etc.)
Aggregator
Shipper
Regulator
Academia

Other operators:

4 Are you involved in the following markets?

gas
electricity
gas and electricity
financial

5 Which legal requirements apply to you? (several responses can be given)

Belgian electricity law of 29/04/99
Belgian gas law of 12/04/65
REMIT (1227/2011 and 1348/2014)
Transparency (2009/72/EC, 2009/73/EC, 713/2009, 714/2009, 715/2009 and 543/2013)
EMIR (648/2012)
MiFID I (2004/39/EC)
MiFID II (2014/65/EU)
MiFIR (600/2014)
MAD (2003/6/EC)
MAR (596/2014)
CSMAD (2014/57/EU)

6 Are you registered as a market operator under REMIT?

☑ Yes
☐ No

7 Do you declare your own data?

☑ Yes
☐ No

Do you carry out reporting for other market operators and how do you do this?

No

Which third party do you use to declare your data?

Our Group discloses inside information according to REMIT through our dedicated website http://www.centricaremit.com/index.asp?pageid=1131

What costs do you pay?

-

For which activities?

-

The market operator's experience

8 Have you already experienced market abuse? If yes, what kind and what did you do?

9 Has a *Compliance Officer* been appointed in your company/group? If yes, what are their contact details?

Market operator's assessment based on experience

10 How do you guarantee the publication of inside information (REMIT)?

What criteria do you use to determine whether or not information is classed as inside information (REMIT)?

How do you ensure that the inside information published under REMIT relates to the "price influence" criterion? Can you describe the processes you have implemented?

11 On a scale of 1 to 5 (where 1 is poor and 5 is excellent), how do you assess **the European platforms** on the transparency of the wholesale gas and electricity markets?

Transparency platforms	frequency of your consultations (Day/Month/Year)	presentation of data and ease of use	frequency of updates - updating of data	availability	quality of data (correct, missing, within deadlines, etc.)
ENTSOE	D	2	4	1	2
ENTSOG	D	3	5	5	3
ALSI	D	2	2	5	3
AGSI+	D	2	2	5	3
Others (please specify)					

Please explain your scores and suggest ways in which these platforms could be improved.

ENTSOE: Very slow web site. API limits number of returns leading to multiple telephone calls. Does not seem to implement the most up to date ACER Schema. Would like to be able to query outages by publish date only and see overlapping outages
ENTSOG: RSS for REMIT Outages doesn't appear to be populated. Unplanned outages frequently have no end date.
AGSI: No versioning of outages. Few mins delay between stated publish date and appearing on website. Does not seem to use ACER Schema
ALSI: No versioning of outages. Few mins delay between stated publish date and appearing on website. Does not seem to use ACER Schema
ELIA: Hard for computer reading. Mainly relies on ENTSOE for publications. Also frequently see outages disappear and re-appear.

Do you use other information channels besides the transparency platforms to inform these markets? If yes, which?

Bloomberg, Reuters, Fluxsys, Engie, Electrabel

Do you have a transparency platform? If yes, what is the address?

No. we do not manage a transparency platfrom. Our Group discloses inside information according to REMIT through our dedicated website
http://www.centricaremit.com/index.asp?pageid=1131

What additional sources of information do you use to make your transactional decisions?

We also use transparency systems from bordering locations to look at flows, nominations and outages.

12 On a scale of 1 to 5 (where 1 is poor and 5 is excellent), how do you assess the data provided on the transparency platform of the wholesale **electricity markets**?

ENTSOE	frequency of your consultations (Day/Month/Year)	usefulness for optimising your activity	frequency of updates - updating of data	availability	quality of data (correct, missing, within deadlines, etc.)
Load	D	4	4	2	2
Generation	D	5	4	2	2
Transmission	D	5	4	2	2
Balancing	D	2	4	2	2
Outages	D	5	4	2	2
Congestion management	D	5	4	2	2

Please explain your scores and try to make your responses complete.

Please see comments to question 11

What data is missing and should be published?

Long term transmission capacities
List of reporting units

How do you assess the *user manuals* provided? Please explain your response.

No comment

How do you assess the tools available for processing data/information (*News & archives, Dashboard, table, mao, chart, Export Data, Data Pre-5.1.15, etc.*)? Please explain your response.

See comments to question 11

What are your three favourite qualities when you consult the ENTSOE platform?

None in particular.

Please list three improvements you would like to see implemented on ENTSOE.

1) rethink API, document limitation makes no sense (you cannnot say whether number of outages is a given range will be more or less than 200)
2) Improve responsiveness of website
3) Implement full ACER schema

13 On a scale of 1 to 5 (where 1 is poor and 5 is excellent), how do you assess the data provided on the transparency platforms of the wholesale *gas markets* ?

ENTSOG	frequency of your consultations (Day/Month/Year)	usefulness for optimising your activity	frequency of updates - updating of data	availability	quality of data (correct, missing, within deadlines, etc.)
TP Map	D	5	5	5	5
Point Data	D	5	5	5	5
Transport Data					
Tariff data					
CMP data					
Referentials reprenant les données par :					
o *Interconnection Points*					
o *Operators*					
o *Balancing Zones*					
o *Operator Point Directions*					
o *Interconnections*					
o *Aggregate Interconnections*					
Point Information					

Please explain your scores and try to make your responses complete.

Useful as an end user tool.
In general we would liek to see more TSOs publishing into this platform (beyond Fluxs)

What data is missing and should be published?

No comment

How do you assess the *user manuals* provided? Please explain your response.

> No comment

How do you assess the tools provided by ENTSOG for processing data/information (*recently viewed items, graphs, charts, export option, API, UMM, RSS notification, Calendar, etc.*)? Please explain your response.

> RSS does not appear complete. API could improve by allowing more refinement on search parameters.

What are your three favourite qualities when you consult the ENTSOG platform?

Please list three improvements you would like to see implemented on ENTSOG.

> 1) Improved RSS reporting of outages
> 2) API improvements for search and outages
> 3) More TSO input

14 On a scale of 1 to 5 (where 1 is poor and 5 is excellent), how do you assess the ALSI and AGSI+ platforms for the transparency of the wholesale **gas markets**?

	frequency of your consultations (**D**ay/**M**onth/**Y**ear)	presentation of data and ease of use	frequency of updates - updating of data	availability	quality of data (correct, missing, within deadlines, etc.)
AGSi+	D				
Storage data	D				
Storage unavailability	D				
ALSI	D				
LNG Data	D				

Please explain your scores and try to make your responses complete.

> Please refer to answers given in question 11

What data is missing and should be published?

How do you assess the *user manuals* provided? Please explain your response.

How do you assess the tools provided for processing data/information?

What are your three favourite qualities when you consult the AGSI+ and ALSI platforms?

Please list three improvements you would like to see implemented on the AGSI+ and ALSI platforms

15 Several market operators have developed a transparency platform for all or part of their own data.
On a scale of 1 to 5 (where 1 is poor and 5 is excellent), how do you assess these transparency platforms on the wholesale gas and electricity markets?

Transparency platforms	frequency of your consultations (**D**ay/**M**onth/**Y**ear)	ease of use	amount of data available	update frequency	quality of data (correct, missing, within deadlines, etc.)
ELIA	D	2	2	2	1
Fluxys					
EEX	D	2	3	2	3
Other 2 (please specify)					
Other 3 (please specify)					

Please explain your scores and try to make your responses complete.

> ELIA: Frequently see outages disappear and re-appear. Without versioning this can appear as cancellations.
> FLUXYS: Not aware of an API from Fluxsys. This would be a welcome addition. User Interface difficult to use and not user friendly
> EEX: Would like ACER schema adopted and RSS for outages

What data is missing and should be published? Please explain your response.

How do you assess the *user manuals* provided? Please explain your response.

How do you assess the tools provided for processing data/information?

What are your three favourite qualities when you consult the following platforms:

FLUXYS

ELIA

Other

Please list three other improvements you would like to see implemented on the following platforms:

FLUXYS

See comments to Q15

ELIA

See comments to Q15

Other

See comments to Q15

16 What suggestions do you have for improving the transparency of the markets?

Data should be made available in near real time. Force system operators to publish transparency information and inside information to centralised platforms in a standardised format. Incentivise other market players to do so limiting the responsibility on market participants in case of technical failure of the platform.

To what extent can the CREG improve the transparency of the markets and clarify the legislation in force?

In the context of ACER and CEER, CREG should pursue the above

17 This last section allows you to share any other comments you would like to make during this public consultation.

In relation to ENSTOE and ENTSOG administered platforms and data other asset owners in Belgium we are not fully satisfied with the level of quality of the data published as fundamental data and the technical way these information are made available to be consumed by market parties acting in the market like us. More attention should be given by ACER and CEER on the improvement on quality for fundamental data.

Please send the completed questionnaire as an Excel document to the following email address: **consult.1637@creg.be**.
CREG thanks you for taking the time to complete this questionnaire.