

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 October 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: ENGIE

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?

es

no

7 Do you declare your own data?

es

no

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

For the publication of inside information, ENGIE only publishes information related to assets that it owns or operates. For the reporting of market data, at this stage, ENGIE only reports for its own transactions.

Which third party do you use to declare your data?

For the publication - we are doing it ourselves via our own REMIT inside information publication portal. For the reporting - ENGIE uses EFETnet

What costs do you pay?

As explained in our letter to CREG on 22nd December 2016: For ENGIE REMIT transparency portal, the annual costs over the period 2014-2016 were in the order of 300.000 euros (low range). About 1/3 were CAPEX (mainly development costs), about 2/3 were OPEX (including maintenance, 24/7 support, infrastructure and licensing costs). These costs do not represent the initial cost of developing the site and our internal tools for the launch in 2011.

For which activities?

na

The market operator's experience

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

As explained in the answer to question 9, ENGIE has put in place a specific organization in order to prevent and monitor any risk of market manipulation. ENGIE is committed to reply to any request of information sent by the regulators. ENGIE has not been convicted for market abuse so far.

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

The implementation of relevant regulations referred to in point 5 is coordinated within ENGIE essentially by its Business Unit Global Energy Management (BU GEM) and is mainly ensured by BU GEM Regulation / Legal / Compliance departments.

BU GEM is the ENGIE business unit in charge of the Group's assets management and all the trading activities for the Group. It includes a MIFID-regulated entity, named ENGIE Global markets which is placed under the supervision of banking and financial regulators, including the French ACPR and AMF and the Belgian FSMA. Due to its specificities, BU GEM has put in place a dedicated organizational set up to ensure its compliance with market abuse related matters for its trading activities, which involves the following teams:

- Market regulation for the monitoring of market developments
- Internal Control & Compliance, focused on ethics via prevention & controls;
- Trading Surveillance/Risk Department dedicated to the detection of market abuse;
- Legal, in charge of regulatory watch and enquiries.

Please note that our CREG Contact for market conduct topics: LST-GEM-Market RFI / market.rfi@engie.com

Market operator's assessment based on experience

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

Publication of inside information under REMIT is ensured by BU GEM for ENGIE Group using the ENGIE transparency platform.

ENGIE has established and implemented internal procedures and policies to comply with any obligation to publish inside information to which ENGIE may be subject to. This includes operational guidance for publication of the inside information and monitoring to detect any failure to comply with the obligation to publish in an effective and timely manner. Monitoring of the effective and timely publication of the relevant information is based on so-called key performance indicators (KPI).

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

Pursuant to REMIT regulation, inside information satisfies four cumulative criteria, namely it is information :

- Of a precise nature; and
- Which has not been made public; and
- Relates, directly or indirectly, to one or more wholesale energy products; and
- Would be likely to significantly affect the prices of those wholesale energy products if it were made public.

In order to determine whether or not these four criteria are met, we have drawn internal guidance to provide operational teams with details and clarification about each of these criteria in light of the ACER guidance and implementation by the national regulators .

For power activities we apply the indicative threshold of 100MW provided by ACER, which we believe is fully relevant and appropriate with a view to disclose inside information in Belgium.
For gas activities, as indicated in the answer 10.1, ENGIE is not the owner of the inside information. In any case, ENGIE refers to the threshold provided by national regulators when available.

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?

As indicated in our reply to answer 10.2, for power activities, ENGIE relies on the indicative threshold provided by ACER in order to assess the price influence of the unavailability.

- First, the current level of 100MW is deemed relevant and appropriate based on market conditions in Belgium
- Secondly, the price influence criteria should not be let to individual case by case human assessment
- Thirdly, from a practical point of view it is indispensable to have an harmonized threshold across maturities and across power markets in Europe.

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	4	4	5	4
ENTSOG	Day	4	4	5	3
ALSI	Day	5	3	5	4
AGSI+	Day	5	3	5	3
Others (please specify)					

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

Since its launch on 1st January 2015, the ENTSOE transparency platform (TP) has gone through major positive evolutions, both content and IT-wise. Primordial in this development, was the launch in April 2015 of the ENTSOE Transparency User Group ETUG (grid operators, market participants & analysis companies), with the aim to collect, analyse and prioritise data user issues regarding both the usability and content of the platform, with a view to agree and recommend solutions and action plans for ENTSO-E assessment and possible implementation. The User Group has identified, together with ACER, key areas for improvement and evolution : user interface, data downloads and data quality. The revision of specific data topics within the 6 major TP datasets (load, generation, transmission, balancing, outages and congestion management), as well as the improvement of the graphical user interface (including the download solutions) gained momentum as of 2016 and is a continuous concern of ENTSOE. Regarding gas, both ALSI & AGSI+ platforms are considered easy to use, while navigating in the ENTSG platform can be tricky and require some experience. Regarding Frequency of updates for those gas platforms: see answer to Q14. Regarding Quality of data for those gas platforms: see answers to Q13 & Q14

Regarding Quality of data for those gas platforms: see answers to Q13 & Q14.

We also consult many operator's websites (REMIT websites of utilities, TSO websites) to access information absent from TP.

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

<http://transparency.engie.com>

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

- weather data, generic/specialized news, commercial vendors, other players' REMIT websites, TSO website

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	M	4	4	4	4
Generation	D	5	4	4	2
Transmission	D	5	4	4	2
Balancing	D	5	4	5	4
Outages	D	5	4	5	4
Congestion management	M	5	4	5	4

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

Though considerable efforts have been made in the domains mentioned under question 11, data quality remains a major topic, especially concerning data completeness and the linked data quality check. E.g. : on 10th May 2017, there was a news message that in the Netherlands the GEMINI offshore windfarm was completely commissioned with 150 turbines and 600 MW overall capacity (http://geminioffshore.com/e_home.html). But, at that moment, there was no data at all published on the ENTSO TP within the production units section. Another example: in UK there's a windfarm called Thanet (wind offshore, 48 WSTN000THNTQ) where the "current installed capacity" is shown with 300 MW but the installed capacity at the beginning of the year is shown with "N/A"! A quick "Google-research" shows that this wind farm is operational since 2010 (status 10th May 2017).

What data is missing and should be published?

Engie's 3 priorities are : (1) generation data per unit available on website and on FTP with higher refresh rate (at least on a hourly basis), (2) all transmission outage data available on website and live refresh on FTP, (3) and need for data timestamps for each new publication.

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

The quality of the user manuals (the so-called Manual of Procedures and related documents) is high, in terms of level of detail and technical description of implementations. Positive is that it is continuously updated in close cooperation with ACER and the ETUG members. Point of improvement is that these revisions should be adopted faster : modifications to data descriptions and their related TP implementations are part of a too intensive negotiation process in between TSOs and regulators (mainly ACER), preventing a faster tackling of the previously mentioned attention areas.

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

[only experience with "News & archives, Dashboard" sections]
Clear communications in the "News" section within the "Dashboard", though not confident that all events are announced. A modernized, more user-friendly graphical user interface (TP Vision Project) has been announced one and a half year ago, the design phase (after a 1st unsuccessful implementation attempt) will be only communicated during the latest ETUG meeting on 15th November.

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

1. central collection and publication of electricity generation, transportation and consumption data and information for the pan-European market.
2. consistency of data
3. user-friendliness

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

Next to Engie's 3 priorities mentioned above :

1. stable performance of the platform (no time out or unavailability of the platform, and loading speed of the webpage)
2. decrease the level of missing data items (e.g. wind and solar generation and forecast data, higher transparency on transmission network)
3. increase the correctness of data (e.g. DA commercial exchanges not in line with transfer capacities / DA prices and load missing or wrong format, DST issues) > data quality check

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** ?

ENTSG	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					
Point Data					
Transport Data	Day	5	4	5	3
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	Month				

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

For gas :

- regarding quality of data, we consider that ENTSG data lack comparability between operators. For instance, some TSOs report their technical capacity net of planned interruptions (and report no planned interruptions) while others report technical capacities and planned interruptions thereof separately. For the sake of transparency, all TSOs should adopt the same definitions. Also, we sometimes notice obvious inaccuracies in forward-looking data (eg seasonal capacities displayed over several years and then suddenly flat capacities at 0 over the remainder of the considered period). Regarding planned outages, information sometimes simply isn't reported on the platform or is out of date (compared to information available on the TSO's website).
- regarding the frequency of updates, we can express satisfactory for some TSOs, while the frequency is lower for others.

What data is missing and should be published?

Regarding need for further data publishing, Engie's 2 priorities are :

- (1) data relating to exits to end consumers (LDZ, industrial, gas to power), which is frequently absent,
- (2) and forward-looking data (capacities technical / booked / available...), which is often provided for only limited periods of time, whereas 10 years should be a minimum.

Furthermore, tariff data seems to be altogether missing although foreseen in the platform architecture.
We also think that the history of the REMIT messages should be published.

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

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

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

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

Improve data quality (see above); add missing data (see above)

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 (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.)
AGSI+					
Storage data	Day	5	4	5	4
Storage unavailability	Month	5	5	5	5
ALSI					
LNG Data	Day	5	4	5	5

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

Frequency of updates: the data on ALSI and AGSI+ could be updated faster than the current 2-day delay.
Quality of data: it is annoying that some SSOs may publish incoherent data without any timely explanation (e.g. NAM for Norg in summer 2017). Data consistency should be checked before publication.

What data is missing and should be published?

The provided data is overall sufficient. Efforts should be made to increase the number of participants to

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

Extend the scope of AGSI+ (number of participating SSOs)

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 (Day/Month/Year)	ease of use	amount of data available	update frequency	quality of data (correct, missing, within deadlines, etc.)
ELIA	D	4	3	4	4
Fluxys	D	4	4	5	5
Other 1 (please specify)					
Other 2 (please specify)					
Other 3 (please specify)					

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

- REMIT messages: history of messages is not available
- Transmission lines outages: there are sometimes discrepancies between ELIA website and ENTSOE. It is then difficult to know which source to trust. Publication date of the messages is not available.
- Frequency of updates: the data on ALSI and AGSI+ could be updated faster than the current 2-day delay.
- Quality of data: it is annoying that some SSOs may publish incoherent data without any timely explanation (e.g. NAM for Norg in summer 2017). Data consistency should be checked before publication.
- Ease of use : data tables are not fully displayed on the screen. The need to scroll horizontally and vertically makes it difficult to view the tables in their entirety.
- Amount of data available : the amount of extractable data is limited to a certain amount at once.

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

- History of messages (REMIT, transmission lines) should be available, with timestamps
- "Report date" of REMIT message page should include a hourly timestamp instead of only the date

Gas: The provided data is overall sufficient. Efforts should be made on increasing the number of participants

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

For load / wind / PV forecasts, it seems that the meteo data source is not mentioned
The user manual on Fluxys' platform provides a detailed explanation of the platform's content and is therefore well appreciated.

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

Gas: Graphic views of the data can be a plus

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

FLUXYS

The exhaustiveness of published data. The organization of the platform.
The availability of the platform.

ELIA

high availability, fast browsing, well structured

Other

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

FLUXYS

The possibility of extracting larger amount of data.
The possibility to view data tables on one screen.
The possibility to reduce the loading time of the data.

ELIA

include history of messages / on the unavailability of grid components, include exact timing of unavailabilities / include timestamps for the publication date on the unavailability of grid componenets

Other

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

REMIT messages: ENGIE has deployed substantial effort to ensure the quality and the clarity of its publication in compliance with the specific data structure requested by ACER. ENGIE regrets that other players do not satisfy the same requirements.
TRANSMISSION: make sure the info on the grid outage is reliable. It is essential to ensure that TSO publish precise unavailability information in due time and ensure consistency with publication on ENTSO-E platform.
FBMC: FB describes implicitly the whole transmission network so there should be full transparency on all lines (not just the lines describes in FB but all the ones that can change the PTDF matrix). All market moving information should be public.

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

ENGIE supports the call for more transparency. However ENGIE considers that this matter should be tackled at European level.

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

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.