

Subject: CREG consultation on the market operators' assessment of the transparency of the freely available information on the wholesale gas and electricity markets
Date: 17 November 2017
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Introduction

On the 19th of October, 2017 the CREG launched a consultation ((PRD)1637) – with a questionnaire – on the market operators' assessment of the transparency of free available information on the wholesale gas and electricity markets. The deadline of the consultation is the 17th of November, 2017.

FEBEG welcomes this consultation and thanks the CREG for creating this opportunity for all stakeholders to express their comments and suggestions. The comments and suggestions of FEBEG are not confidential.

Importance of transparency

Transparency on market data, market functioning and price formation is key for market participants to be able to predict the market outcome in a consistent way and to have – as a consequence – **confidence in market rules and market functioning**. Market parties need to forecast market prices in order to take efficient short term and long term decisions, e.g. investments, maintenance scheduling, operational scheduling and dispatch. Making informed decisions results in a more efficient system and leads therefore to welfare gains.

FEBEG would like to thank the CREG for its continuous efforts to – at Belgian and European level – **improve transparency** in the wholesale gas and electricity markets.

Comments and suggestions

Transparency organized in an efficient way and based on a level playing field

FEBEG welcomes all improvements with regard to the transparency of information on the wholesale gas and electricity markets. In this respect, FEBEG fully supports the **establishment of a single European platform**: such a platform allows market operators to consult all relevant information in an easy, fast, efficient and user-friendly way.

FEBEG also wants to emphasize the **importance of a level playing field** as – beyond the question of fair competition – preferential treatment of certain market participants leads to suboptimal market outcomes. Therefore, FEBEG is of the opinion that the indicative threshold of ACER of 100 MW – applied at the moment – is very important. FEBEG prefers such a harmonization at European level: a case-by-case approach should be avoided.

Transparency with regard to gas infrastructure

FEBEG wants to point out that there is still some lack of clarity with regard to the approach for transparency of gas infrastructure:

- It should be the **responsibility of the owner of an asset** to publish all relevant information with regard to his asset: this is not a shippers' responsibility.
- The owners of gas infrastructure shouldn't only publish information on the availability of their infrastructure, but **also on the gas flows**.
