

Consultation report

(B)1637

21 December 2017

on

“a questionnaire on the market operators' assessment of the transparency of the freely available information on the wholesale gas and electricity markets”

conducted in application of Article 23, § 2bis, of the Act of 29 April 1999 on the organisation of the electricity market and of Article 15/14, § 4, of the Act of 12 April 1965 on the transport of gaseous and other products through pipelines, in conjunction with Article 46, § 1, of the Rules of Procedure of CREG's Management Committee.

Non-confidential

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1. INTRODUCTION

The COMMISSION FOR THE REGULATION OF ELECTRICITY AND GAS (hereafter: CREG) organised a public consultation on the market operators' assessment of the transparency of the freely available information on the wholesale gas and electricity markets.

This consultation was held from 19 October until 17 November 2017. CREG referred to on its website. Respondents could send their comments to CREG by e-mail. The documents used for this consultation are included in Annexe 1 of this document.

This report contains three sections: the purpose, the responses received by CREG and its conclusions.

A copy of all the comments received by CREG is appended in Annexe 2 of this report.

CREG's Management Committee approved this report at its meeting of 21 December 2017.

2. PURPOSE

1. Well-functioning wholesale gas and electricity markets require fully transparent information. A lack of market transparency led to the 2008 financial crisis, which highlighted major weaknesses in the operation and transparency of the financial markets and, as a result, accelerated the incorporation of several new, more coercive rules into the regulations and directives. Adaptations to certain Regulations and Directives have already been scheduled for the coming months and years. The public consultation only related to the current Regulations and transposed Directives on Transparency, REMIT and the Financial Instruments.

2. At national level, the successful achievement of European transparency objectives regarding the monitoring of the market by its own operators, will supplement CREG's periodic monitoring of the market's operation and the changes in Belgian wholesale natural gas and electricity prices. The gas and electricity laws allow CREG to monitor "the degree of transparency, including that of wholesale prices" and to check "compliance with the transparency obligations" by electricity and natural gas companies.

3. CREG organised this public consultation, using this questionnaire, to assess the actual level of Transparency in these markets, including the Regulations/Directives on Transparency, REMIT and the Financial Instruments, and to find out the market operators' tangible experiences and concrete suggestions for improving the operation of the markets. This consultation follows from CREG's non-confidential study (F) 1637 of 28 September 2017, which aimed to inform the market of the many legal requirements, implications and consequences of the current European regulations and transposed European Directives on Transparency, REMIT and the Financial Instruments.

3. THE RESPONSES

3.1. PRESENTATION OF THE RESPONDENTS

4. CREG received responses from 4 respondents (in alphabetical order): CENTRICA, ENGIE, FEBELIEC and FEBEG

3.1.1. CENTRICA¹

5. “CENTRICA’s headquarters are in the United Kingdom. The company has expertise across the entire energy value chain: negotiation, exploration, production, storage, distribution and trade of energy.

6. CENTRICA is a major energy supplier in the British, Irish and North American markets. Moreover, CENTRICA offers residential consumers a wide array of products for connected homes (including: smart thermostat, connected appliances, and so on).

7. CENTRICA's Distributed Energy & Power Business supplies products to professional customers that allow them to be more energy-efficient and have tools for greater energy flexibility.

8. CENTRICA’s Energy Marketing & Trading (EM&T) Business operates in all the European energy markets, including in the electricity and gas trade.

9. CENTRICA has production units in the United Kingdom and Ireland and operations in the North Sea. CENTRICA has no Belgian production unit.

10. CENTRICA also has a gas storage site in Rough, in the United Kingdom.

11. In November 2017, CENTRICA acquired REstore, with registered office in Antwerp. REstore is a demand response aggregator for very large industrial electricity consumers, offering demand side management software and monetising consumer flexibility in the primary and tertiary reserves markets. Currently, the peak load made available to the network operators (Belgium, France, Germany and the UK) by REstore amounts to 1.7 GW”.

3.1.2. ENGIE²

12. “ENGIE has a presence in 70 countries around the world. The group has expertise across the entire energy value chain, in the businesses of electricity, renewable energy, natural gas and energy services.

ENGIE has 24 Business Units (BU), five of which also work for the group (Exploration and International Production BU, Global LNG BU, Global Energy Management BU, Tractebel Engineering BU, Gastransport and Technigaz BU).

ENGIE's electricity supply chain incorporates the centralized production of low carbon electricity and electricity produced from renewable sources like hydroelectricity, biomass, wind power, and solar power. The is supplemented by production from the *trade* and sale of electrical energy.

¹ <https://www.CENTRICA.com/>.

² <https://www.engie.com/en/group/> and <http://www.engie.be/en/>.

In the gas sector, ENGIE's activities incorporates activities related to the supply, distribution, *trade* and sale of gas and the use of new gas technologies.

ENGIE's activities in Belgium include the production³, storage, negotiation and sale of energy to consumers under the ENGIE-Electrabel brand ".

3.1.3. FEBELIEC

13. "FEBELIEC is the "Federation of Belgian Industrial Energy Consumers" and represents the industrial energy consumers (electricity and natural gas) in Belgium in issues about energy and climate politics on the Belgian and European level.

14. FEBELIEC set itself a double objective:

- perform competitive electricity and natural gas prices for businesses in Belgium;
- contribute to the security of the supply of energy in Belgium."

3.1.4. FEBEG

15. "FEBEG represents electricity producers and the traders and suppliers of gas and electricity as well as the laboratories in the electricity and gas sector.

16. FEBEG's mission is to:

- promote a sustainable, more secure and competitive energy supply by means of:
 - a free and properly operating gas and electricity market;
 - stable, favourable and non-discriminatory legal, regulatory and economic preliminary conditions for activities relating to the production, trade or supply of electricity and gas, offering energy services and the laboratories needed for these activities.
- group the companies in the electricity and gas industry and defend their general interests, more specifically on the social, economic, tax, legal and environmental level;
- study, encourage and achieve anything that may contribute to the normative, scientific or industrial development of Belgian gas and electricity companies;
- promote the quality and security of the data traffic and transactions between its members and other market players, more specifically by providing administrative support for the financial reconciliation in the Belgian electricity and gas market ".

³ <http://corporate.ENGIE-electrabel.be/wp-content/uploads/2017/02/productiepark-voor-website.pdf>.

3.2. RECAP OF THE RESPONDENTS' RESPONSES

17. The respondents who answered the questionnaire and contributed to the publication of this survey thanked CREG for its efforts to improve market transparency.

FEBELIEC congratulated CREG on the quality and clarity of the study which led to the consultation. FEBELIEC hopes that CREG can organise a workshop in the next few months for all the stakeholders (producers, suppliers...) during which it presents this study and can receive feedback from market players on the application of transparency legislation in Belgium.

18. CENTRICA answered CREG's questionnaires as a user of the transparency platforms. CENTRICA's Energy Marketing & Trading (EM&T) business uses the information on unavailability, availability and flows to better understand the interaction between supply and demand and manage the risk associated with its portfolio accordingly.

19. ENGIE answered the questionnaire as an energy supplier in the Belgian market. ENGIE filled out the entire questionnaire, and discussed the problem of inside information and its assessment of transparency platforms.

20. While FEBELIEC did not actually fill out the questionnaire, it did send a letter with feedback about the study to which the questionnaire refers.

21. FEBEG did not fill out the questionnaire but gave comments in a letter, focussing essentially on market transparency.

22. The various responses or comments of respondents to the questionnaire focus on the following:

- the ENTSOE transparency platform;
- the ENTSOG transparency platform;
- the ALSI and AGSI+ platforms;
- the TSOs' transparency platforms;
- the problem of the public disclosure of inside information;
- suggestions for improving market transparency.

3.2.1. The ENTSOE transparency platform

3.2.1.1. CENTRICA

23. CENTRICA finds the ENTSOE platform very slow. The API⁴ limits the number of returns leading to multiple telephone calls. ENTSOE does not seem to implement the most recent ACER Schema.

CENTRICA is not entirely satisfied with the overall presentation and user-friendliness of the ENTSO platform. CENTRICA highlighted problems with the availability and quality of the data for all six data themes and problems with the exploitation of the supplied data in terms of balancing.

CENTRICA would like to be able to query outages by publish data only and see overlapping outages.

⁴ Application Programming Interface.

CENTRICA would also prefer to have information about long-term transmission capacities and a list of reporting units.

CENTRICA wants ENTSOE:

- to rethink the API as the document limitation makes no sense;
- improve the site's responsiveness;
- implement the full ACER Schema.

3.2.1.2. ENGIE

24. According to ENGIE, the ENTSOE transparency platform has changed in a good way since its launch in 2015, both in terms of the content and IT-wise.

The establishment in April 2015 of the ENTSOE Transparency User Group (ETUG) in which all the grid operators, market players and analysis companies participate, was a vital step in the development of the ENTSOE platform. This group aims to collect, analyse and prioritise data user issues regarding the platform's use and content, with a view to agree on and recommend solutions and action plans to assess the ENTSOE platform and possible implementation. The user group identified key areas for improvement and evolution: the user interface, data downloads and data quality.

The revision of specific data in the six main 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.

While considerable efforts have been made for all the above, data quality continues to be a major concern, more specifically the exhaustiveness of the data and the data quality check.

Specific attention should be paid to the data quality of the generation and transmission data:

- the generation data per unit available on the website and the FTP should be refreshed more regularly. ENGIE suggests a higher refresh data, at least once every hour.

The two examples below explain their concerns about the data quality of the generation data:

- on 10 May 2017, a news message⁵ was published stating that the GEMINI offshore windfarm, which has 150 wind turbines and an overall capacity of 600 MW, was completely operational. At the time, no data was published to the ENTSOE transparency platform in the production units section;
- in the UK, a windfarm called Thanet with a "current installed capacity" was listed as having a capacity of 300 MW but the installed capacity at the beginning of the year is listed as "N/A" on the ENTSOE platform! A quick Google search reveals that this windfarm has been operational since 2010.

- the transmission outage data on the website and the FTP should be refreshed in real time.

ENGIE would also like each new publication to come with a timestamp.

ENGIE also mentions that the user manual of the ENTSOE platform is of very high quality, in terms of the level of detail and the technical description of implementation. The manual is updated with the cooperation of ACER and ETUG members. Nonetheless, ENGIE would like to see faster

⁵ http://geminiwindfarm.com/e_home.html.

updates/revisions. The fact that changes are made so slowly to the data descriptions and their implementation is entirely due to the very intensive negotiation process between the TSOs and their regulators (mainly ACER).

Regarding the "News & archives, Dashboard" section, ENGIE does not trust that all the events are actually announced. A modern, more user-friendly graphic interface (TP Vision Project) was announced one and a half year ago and the design phase (after a first unsuccessful attempt to implement it) was announced at ETUG's last meeting on 15 November.

ENGIE stated the ENTSOE platform had the following qualities:

- central collection and publication of data on electricity generation, transport and consumption and of information on the pan-European market;
- the data are consistent;
- the tool is user-friendly.

ENGIE indicated three improvements it would like to see implemented on ENTSOE:

- stable performance of the platform (fewer time-out or unavailability of the platform and faster loading speed of the webpage);
- reduction of the number of missing data items (e.g., the wind and solar generation and forecast data, more transparency about the transmission network);
- more accurate data (e.g., DA commercial exchanges are not in line with transmission capacities/DA prices, missing load data, wrong format, DST issues) thanks to a better data quality check.

3.2.2. The ENTSOG transparency platform

3.2.2.1. CENTRICA

CENTRICA thinks the ENTSOG platform is useful as an end user tool.

CENTRICA would like to see more TSOs publishing to this platform.

CENTRICA also wants ENTSOG:

- to allow RSS reporting on unavailability, in accordance with REMIT;
- to change the API so more refinement on search parameters is possible;
- wants outages to have an end date.

3.2.2.2. ENGIE

25. According to ENGIE, navigating the ENTSOG platform can be tricky and requires some experience.

Regarding the data, ENGIE feels that ENTSOG data lack comparability between operators. For instance, some TSOs report their net technical capacity of planned interruptions (and do not report planned

interruptions) while others report technical capacities and planned interruptions. For the sake of transparency, all the TSOs should adopt the same definitions.

In addition to this, ENGIE has noticed obvious inaccuracies in forward data (e.g., seasonal capacities reported over several years, followed by sudden flat capacities at 0 for the remainder of the period in question).

Regarding planned outages, the information is sometimes not reported to the platform or is outdated (compared to the information on the TSO's website).

ENGIE estimates that the frequency of updates is sufficient for some TSOs while the frequency is lower for others.

ENGIE would like to see the following improvements made to the ENTSOG platform:

- data relating to exits and to end consumers;
- extension of the availability of forward data (technical capacity, availability) to a minimum of 10 years;
- tariff data seem to be missing altogether in the platform's architecture;
- the history of the REMIT messages should also be published.

Moreover, ENGIE wants ENTSOG to improve data quality and reduce the missing data.

3.2.2.3. The ALSI AND AGSI+ platforms

3.2.2.4. CENTRICA

CENTRICA is not happy with the presentation of data and the frequency of updates of the ALSI and AGSI+ platforms.

CENTRICA observed a delay between the stated publication date and the actual date of publication to the website.

CENTRICA also noted that:

- ALSI and AGSI+ do not give access to unavailability data;
- the platforms do not use the ACER schemas.

3.2.2.5. ENGIE

26. ENGIE finds the ALSI and AGSI+ platforms very user-friendly.

The data on the ALSI and AGSI+ platforms could be updated faster than the current two-day delay.

Regarding data quality, ENGIE finds it annoying that some SSOs may publish incoherent data without any timely explanation (e.g., NAM for Norg in summer 2017). According to ENGIE, data consistency should be checked before publication.

ENGIE consider the provided data to be sufficient overall. Nonetheless, efforts should be made to increase the number of participants to these platforms (e.g. the number of SSOs on AGSI+).

3.2.3. The TSOs' transparency platforms

3.2.3.1. CENTRICA

3.2.3.1.1. *Elia*

CENTRICA finds the ELIA site difficult to read on a computer, meaning it is not user-friendly.

According to CENTRICA, the available data is insufficient, the frequency of updates not adapted and data quality is also insufficient.

CENTRICA mainly relies on ENTSOE for publications.

CENTRICA also notes that outages disappear and reappear on the Elia website. If there is no history, disappearing outages may be interpreted as cancellations.

3.2.3.1.2. *Fluxys*

CENTRICA finds the user interface difficult to use and not very user-friendly.

3.2.3.2. ENGIE

3.2.3.2.1. *Elia*

27. According to ENGIE, sometimes there are discrepancies between the ELIA website and the ENTSOE platform concerning transmission line outages. ENGIE finds it difficult to determine which source can be trusted.

The meteo data source is not mentioned for load/wind/PV forecasts.

According to ENGIE, the three qualities of the Elia website are:

- good availability of the data;
- fast navigation;
- the platform's structure.

ENGIE feels the following improvements could be made:

- include the REMIT message history;
- include an accurate calendar for the unavailability of grid components;
- include timestamps for the publication date on the unavailability of grid components.

3.2.3.2.2. *Fluxys*

The user manual on the Fluxys platform provides a detailed explanation of the platform's content and is therefore very useful.

According to ENGIE, the three qualities of the Fluxys website are:

- the exhaustiveness of the published data;
- the platform's organisation;
- the platform's availability.

ENGIE feels the following improvements could be made:

- the option to extract larger data amounts;
- the option to view data tables on one screen;
- the addition of a graphic interface to visualise data;
- the reduction of the data loading time.

3.2.4. The problem of the public disclosure of inside information

3.2.4.1. ENGIE

Within ENGIE, the implementation of relevant regulations is mainly coordinated by the group's Global Energy Management BU (BU GEM) and is mainly ensured by its regulating departments BU / GEM / Legal / Compliance.

BU GEM is the ENGIE business unit in charge of managing the group's assets and all its trading activities. The group has a MIFID-regulated entity, called ENGIE Global Markets, which is under the supervision of the banking and financial regulators, including the ACPR in France and the AMF and the FSMA in Belgium. Due to its specificities, BU GEM has put in place a dedicated organisational set-up to ensure its compliance with market abuse related matters for its trading activities. The following teams are involved:

- market regulation for the monitoring of market developments;
- internal control and compliance, focussing on ethics with prevention and controls;
- trading / Risk Department, for detecting market abuse;
- legal, in charge of regulatory surveillance and investigations.

The publication of inside information under REMIT is the task of its Global Energy Management Business Unit for the ENGIE Group, using ENGIE's transparency platform.

ENGIE has established and implemented internal procedures and policies to comply with any obligation to publish inside information that is applicable to ENGIE. This includes operational guidelines for the publication of inside information and monitoring to detect any failure to comply with this obligation to publish it in an effective and timely manner. The monitoring of the effective and timely publication of relevant information is based on key performance indicators (KPIs).

ENGIE distinguishes between electricity and gas:

- for electricity: ENGIE has put in place internal policies and procedures for the publication of inside information on ENGIE's transparency platform by dedicated teams for the power plants managed by ENGIE or for which ENGIE concluded specific agreements, requiring it to report inside information;
- for gas: the implementation of REMIT for ENGIE's gas activity is different, compared with electricity, as ENGIE is not the owner of the inside information for gas. As set out in the ACER Guide, "*the disclosure obligation is [...] related to inside information in respect of business or facilities which the market*

participant of the respective undertakings own(s) or control(s), [... and] in respect of business or facilities for whose operational matters the market participant or respective undertaking is responsible". Consequently, ENGIE considers that this information must be published by the transmission system operators, who are the only ones in possession of aggregated and relevant information for the market.

Pursuant to REMIT regulations, the inside information must fulfil four cumulative criteria, i.e., the information must:

- be precise; and
- not have been publicly disclosed; and
- is linked, whether directly or indirectly, to one or more wholesale energy products; and
- in all likelihood would significantly affect the prices of wholesale energy products if publicly disclosed.

To determine whether these four criteria are met, ENGIE has drawn up internal guidelines, to provide the operational teams with details and precisions for each of these criteria, in light of the ACER guidelines and the indicators of the national regulators.

For electricity activities, ENGIE applies the indicative threshold of 100 MW provided by ACER. ENGIE estimates that this threshold is fully relevant and appropriate for the disclosure of inside information in Belgium.

For gas activities, ENGIE is not the owner of the inside information. In any event, ENGIE always refers to the threshold provided by national regulators, when available.

3.2.5. Suggestions for improving market transparency

3.2.5.1. CENTRICA

CENTRICA feels that the data should be made available in near real time.

System operators should also be forced to publish transparency information and inside information to centralised platforms, in a standardised format. The other market players should be encouraged to do this, by limiting the responsibility of market players in case of technical failure of the platform. CREG, CEER and ACER should pursue this.

In relation to ENSTOE and ENTSOE administered platforms and other data asset owners in Belgium, CENTRICA is not entirely satisfied with the level of the quality of the data published, as fundamental data, and the technical manner in which this data is made available to be used by market players. ACER and CEER should pay more attention to improving the quality of fundamental data.

3.2.5.2. ENGIE

In terms of the REMIT messages, ENGIE has made substantial efforts to ensure the quality and the clarity of its publication, in compliance with the specific data structure required by ACER. ENGIE regrets that other market players fail to comply with these requirements.

Regarding transmission data, ENGIE asks that information on grid outages is reliable. Ensuring that the TSOs publish accurate unavailability information in due time and that this information is consistent with the publication on the ENTSOE platform is crucial.

For Flow-Based Market Coupling, flow-based implicitly refers to the entire transmission network, meaning there should be full transparency on all lines (and not just on the lines described in Flow-Based but on all the ones that may affect the PTDF matrix). All market information should be publicly disclosed.

3.2.5.3. FEBEG

FEBEG fully supports the establishment of a single European platform, which would allow market operators to consult all relevant information in an easy, fast, efficient and user-friendly manner.

FEBEG also stresses 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 which is currently applied is very important. FEBEG prefers a European harmonisation rather than a case by case approach.

FEBEG points out that there is still some lack of clarity regarding the transparency of gas infrastructure:

- publishing all relevant information about an asset should be the owner's responsibility and not the shipper's;
- the owners of gas infrastructure should not just publish information about the availability of their infrastructure, but also about the gas flows.

4. CREG'S CONCLUSIONS

28. CREG will take into account the various concerns of the respondents in the exchanges it has within ACER and CEER but also in the interactions with the two TSOs, i.e., Elia and Fluxys.

29. CREG notes that the market players indicate that there is still some room for improvement to the European transparency platforms.

The ENTSOE platform can be improved as follows:

- the platform must become more stable and more reactive;
- more exhaustive;
- the accuracy of the data can be improved;
- compliance with the ACER schema;

The ENSTOG platform can also be improved in terms of:

- the comparability of the data;
- the accuracy of certain data (e.g.: forward data);
- the completeness and updates of information on grid outages and implementation Of RSS;
- the frequency of data updates;
- the range of search parameters;
- participation with the TSOs.

The ALSI and AGSI+ platforms can also be improved in terms of:

- information publication times;
- number of participants of these platforms;
- schema used to comply with ACER's criteria;
- data consistency.

30. The sites of the Belgian TSOs are considered to be well-structured, with good availability.

The Elia site could incorporate the history of the REMIT messages, more detailed information (timestamp) on the publications and a calendar of unavailability of network components. It should include the weather data reference used to specify the load or the renewable production forecasts. Elia's site could still be improved, in terms of data quality, the frequency of updates and the stability of unavailability data.

The Fluxys site can make improvements in terms of load time, increase the volume of the loaded data and the visualisation of data and the user-friendliness of the user interface.

31. As far as the publication of inside information is concerned, the market players are all in favour of a European threshold and feel the information should be published to a European platform, in a standardised format. Various European working groups are currently discussing the publication thresholds.

32. CREG will continue to inform market players about regulatory changes and will contact the national TSOs to discuss the requested improvements.

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For the Commission of Electricity and Gas Regulation:

Laurent JACQUET
Director

Andreas TIREZ
Director

Marie-Pierre FAUCONNIER
President of the Management Committee

ANNEXE 1

Documents used in the framework of this consultation

Public consultation by questionnaire on the market operators' assessment of the transparency of the freely available information on the wholesale gas and electricity markets, available online at <http://www.creg.be/fr/consultations-publiques/consultation-publique-au-moyen-dun-questionnaire-sur-lappreciation-par-les>.

Consultation document(s):

- Public consultation document (PRD)1637 of 19/10/2017;
- Questionnaire on the market operators' assessment of the transparency of the freely available information on the wholesale gas and electricity markets.

ANNEXE 2

Copy of all the versions of the received responses

CENTRICA

ENGIE

FEBEG

FEBELIEC

<http://www.creg.be/fr/consultations-publiques/consultation-publique-au-moyen-dun-questionnaire-sur-lappreciation-par-les>.

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: 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 platform. 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, map, 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 cannot 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 like to see more TSOs publishing into this platform (beyond Fluxys)

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 (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+	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 (Day/Month/Year)	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

ELIA

Other

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

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

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.

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://geminwindfarm.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 extracable 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.

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
Contact: [REDACTED]
Phone: [REDACTED]
Mail: [REDACTED]

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**.

From: febeliec [<mailto:febeliec@febeliec.be>]

Sent: vendredi 1 décembre 2017 10:57

To: [REDACTED]

Cc: [REDACTED]

Subject: Studie over de toepassing van de Europese en Belgische wetgeving in het kader van de transparantie van de Belgische groothandelsmarkten voor elektriciteit en aardgas

Beste [REDACTED],
Beste directeurs,

We hebben met veel belangstelling van uw studie 1637 over de transparantiewetgeving, en wensen u te feliciteren met de kwaliteit en overzichtelijkheid ervan. We blijven hierover regelmatig vragen ontvangen van onze leden, en hopen dan ook dat de CREG in de volgende maanden een nieuwe workshop voor de betrokken partijen (ook producenten, traders, ...) kan organiseren om deze studie voor te stellen en om feedback te ontvangen van de marktpartijen over de toepassing van de transparantiewetgeving in België.

We zijn graag bereid hierover verder van gedachte te wisselen.

Met dank,

Beste groeten,



Do you have the solution for our
country's energy challenges ?
Send it in for the
FEBELIEC ENERGY AWARD 2017 !

DEADLINE FOR APPLICATION EXTENDED TILL 15 DECEMBER !

[REDACTED]
on behalf of **Febeliec**

Federation of Belgian Industrial Energy Consumers

BluePoint Brussels

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[REDACTED]
Febeliec represents the industrial consumers of electricity and natural gas in Belgium.