CONSULTATION RESPONSE

EFET
European Federation
of Energy Traders

ENSTO-E Transparency Platform survey

23 December 2022

The European Federation of Energy Traders (EFET) welcomes the opportunity to provide comments to ENTSO-E public survey for users.

Market participants access the Platform on a regular basis, sometimes multiple times per day. Most companies often have IT departments that support their gaining automatic access; often, data are retrieved automatically and integrated into an internal database.

Some market participants have dedicated staff or even teams working only on transparency data and are members of the ENTSO-E Transparency Group.
The problems that market participants encounter include completeness and accuracy of data by different TSOs. For trading, timelines and user friendliness is also of essence.

Key messages

1. In the short term: fill the compliance gaps with EU Regulation 543/2013 and highlight Data Providers with contact points that are the cause of the issues

2. In the medium term: include batteries, electrolysers, P2G, demand response, and resistors in the platform. Increase volume granularity and CO_2 level disclosure for the different technologies.

Detailed answers

Which category of ENTSO-E TP users do you belong to?

(Required)

 Research

 Regulatory

 Consulting

 Industry

 NGO or journalism

 <mark>Energy Trader</mark>

 DSO

 BRP

How experienced would you consider yourself in using the Transparency Platform?

Limited experience   Intermediate   Frequent user <mark>Expert</mark>

Which datasets from the Transparency Platform have you been using the most? (please mention the exact name and article number)

- Outages
- Load
- Transmission
- Generation
- Ancillary services auction and regulation power

What do you use Transparency data for?

<mark>Fundamental power system modelling</mark>

Econometric analysis

<mark>Statistical analysis</mark>

<mark>Energy Trading</mark>

Balancing Markets

Which other online data publication sources do you use to retrieve electricity market data?

- Elexon
- National TSO's websites
- NEMO's websites (JAO, NordPool, EPEX, …)
- Weather / meteorological data
- ERA, TYNDP scenarios
- Static Grid models

Do you rely on Transparency data to make business decisions?

<mark>Yes</mark>

No (please specify)

Do you find Transparency Platform data to be inconsistent with other sources? If so, which data and which other sources?

<mark>Yes</mark> (please specify)

No

- Tennet NL claims they cannot publish Solar and Wind actuals but they are members of an initiative (EnergieOpwek) that does exactly so and charges 20k€/year for it.
- There are no generation outages publication in Croatia.
- Generation outages in some countries (e.g. Hungary, Slovakia, Romania) are not consistent with the publications of the TSOs on their own platforms.
- There are no outages publication in Slovakia beyond the current year, not even for nuclear power.
- Germany and Netherlands do not publish actual generation by unit of offshore wind farms, even if some are >100MW.
- A lot of countries (e.g. BE) do not publish consumption of pumped storages.
- German load gets randomly republished without any precise definition of the perimeter.
- In general, the compliance with the regulation's requirement of publishing "Actual Total Load" seems very patchy, with several TSOs (e.g. Tennet NL, APG, …) publishing what looks more like a vertical Load. The Detailed Data Description is not so detailed in this respect. As a first step, the TSOs should publish a detailed description of the perimeter (losses, self-generation, …) of what they publish.
- TSOs do not provide, on the transparency platform, complete information on transmission outages plans (e.g. outage data is inconsistent compared to Inside Information Hungary, Transelectrica).
- Load data is inconsistent with PSE (PL). EMS has a longer history of data for RS on their Energy Flux platform.
- Outages of the Transparency platform and changes in data formats are often not announced in advance.

Within what timeframe do you need electricity market data?

Intraday

Day-ahead

Within one week

Within one month

Do you find data on the platform to be available when you need it?

Data is rarely available

Data is usually available

Data is always available

Is finding data on the Platform intuitive?

1   2   3   4   5

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It is not intuitive to understand the "Updated (UTC)" time indication in the Outages / Unavailability of Production and Generation Units dataset (which is a pop-up window, see visual below for reference). It appears to indicate the time of publication on the ENTSO-E platform.

Nevertheless, what matters under the REMIT regulation is the time of publication on the national transparency platform. The time of publication on the national transparency platform is a key parameter to assess REMIT compliance practices. As such, we are interested in carrying out an assessment of REMIT publications practices across European countries but could not do so due to a lack of information.

We would strongly encourage ENTSO-E to indicate the time of disclosure of a REMIT information on the national transparency platform on top of (or instead of) the time of publication on the ENTSO-E platform.

In some countries, there is not even a national platform (NL).

Do you find the user guides that are published on the Help Page of the Transparency Platform insightful?

Yes

No (please specify)

How would you rate the segmentation of the data, the naming conventions, and the navigation on the platform?

1   2   3   4   5

Which of the following options do you use for accessing data?

Website GUI

FTP server

Restful API

Subscriptions

Web services

ECP

Why did you choose your current method of accessing the data?

No comments.

How satisfied are you with your current method of accessing the data?

1   2   3   4   5

Would you find it useful to be able to select multiple data items and/or download it/them in an aggregated format?

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==Yes== (please specify)

No

There is a block on the platform in data download after certain number of requests. That complicates the data availability.

We would like to select multiple data items and download them in an aggregated format. Currently, it is only possible to download data for one control area/bidding zone at a time. We would like to be able to select all data items and to download them in an aggregated format at once.

Visual:

Also, if outage versions are consecutive, that would be very helpful. Otherwise, they look like missing versions. In the below case, our process considers them as missing versions and keeps on looking for the data which is not present.

What can ENTSO-E improve in terms of granting automatic data excess (e.g., API documentation, etc.?)

We wish to have more examples of using API.

Also, ENTSO-E has suggested to use either SFTP or API for outages. However, we can never use SFTP for Outages because it has data for both BZN and CTA for all areas, that is duplicate data which cannot be identified. So when we look at SFTP data at any point of time, there are two rows which are talking about the same outage.

It would be helpful to have a column telling the user which is Master/Replica.

Are you already aware of the TP MoP documentation?
https://www.entsoe.eu/data/transparency-platform/mop/

Yes

No

Do you find the documentation to be of sufficient quality?

Yes

 No (Is there something missing from the data documentation?)

Is the data license for information obtained from the Platform clear? ("List of Data available for free re-use" on the TP Help Page)

1   2   3   4   5

Has the data licensed prevented you from using the data for any purpose?

Yes (please specify)

 No

Please put the following items in priority order from your perspective (1 being top priority):

Platform availability **3**

Graphical user interface quality and responsiveness **5**

Data download options **6**

New (perhaps non legally mandated) data **1**

Data quality **2**

Higher API limit **4**

Do you contact ENTSO-E Service Desk for TP data-related questions?

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Yes

No

Not aware of the service

If you answered yes to the previous question, how satisfied are you with the service?

1   2   3   4   5

EFET regrets the lack of answers and/or the quickness of the answers (around 3 months)

What suggestions do you have to improve the service desk services?

We would expect an answer within 1 week.

What suggestions do you have for improving the Transparency Platform?

Completeness, accuracy, timeliness and user friendliness are the criteria mentioned in Regulation 543/2013 to guide the Transparency Platform. We comment on each point further below.

Detailed requirements

Full transparency and availability of data in the following categories, for the following countries – either current day data is missing, or no data is available:

- Total Load – Day Ahead/Actual: AL, RS (reporting for a different perimeter without XK since 14/12/2020, can RS and XK have separate load data in the past as well?)

- Actual Generation per Production Type: AL, HR (most recent data looks to be less granular), MD, MK. Missing pumped storage consumption in BA, RS, SI.

- Actual Generation per Generation Unit: AL, CZ, HR, LT, MK, PL, RO, RS, SK, SI.

- Production and Generation Units: HR.

- Unavailability of Production and Generation Units – 2023 outages are unavailable for: AL, BA, EE, HR, MD, ME, MK, SK, SI, XK

- Unavailability in Transmission Grid – 2023 outages are unavailable for (in both directions) on the following borders: AL_GR, AL_ME, AL_RS, AL_XK, BA_HR, BA_ME, BG_GR, BG_MK, BG_RO, BG_TR, MD_RO, ME_IT, ME_XK, MK_GR, MK_XK, SI_IT.

Completeness

Generation outages publications are still missing or are inconsistent with the TSOs publications on their own platforms. This is also the case for generation by bidding zone.

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Data back feeding should be available since 2015, including gaps in the time series with the latest methodology.

Transmission line outages is missing in certain countries.

Scheduled flows and NTCs for complex areas (e.g. virtual bidding zones) are not published.

Actual generation by unit of offshore wind farms is missing in certain member states, even if some are >100MW. The same applies for consumption of pumped storage. In addition, it was pointed out that the 100 MW reporting threshold for individual units seems to be applied inconsistently—sometimes to entire power stations, in other cases to individual electricity generators.

Unavailability Of Production And Generation Units is inconsistent. Some countries publish only production units, other only generation units and some publish both. It is also inconsistent in time. Some outages get cancelled without new update. For instance, a week after the outage is over information gets deleted from the web, and market participants cannot check the history.

Forecasted Transfer Capacities – Day ahead, Week ahead and month ahead data are wrong/not published (non-compliance with art. 11 of Regulation 543/2013). Unpublished capacities for all aforementioned timeframes appear for various interconnections, particularly newer ones.

Additionally, we would like to underline that criteria mentioned in Regulation 543/2013 are mandatory requirements that TSOs should comply with: TSOs which already have additional and more detailed information published on the Transparency Platform should refrain from reducing such level of transparency.

<u>Accuracy</u>

In general, the compliance with the regulation's requirement of publishing "Actual Total Load" seems still patchy, with several TSOs publishing what looks more like a vertical Load. The Detailed Data Description is not so detailed in this respect. As a first step, the TSOs should publish a detailed description of the perimeter (losses, self-generation, …) of what they publish.

The ENTSO-E definition of load data is clear. TSOs should therefore be transparent about why they are not complying and, where applicable, outline what steps are being taken to address non-compliance.

Publication of REMIT messages from 2015 on generation have misleading dates.

Generation by production unit does not match generation by fuel type.

<u>Timeliness</u>

Data should be published as soon as possible and not '*no later than…*''. Issues with timeliness are most relevant for users working on a close-to-real-time basis, especially market participants.

User friendliness

ENTSO-E should improve the data publication formatting. Currently the Excel download files contain data in text format (should be in number format) and contains multiple breaks within the data, which makes processing it quite difficult.

Here is a proposal:

22:30 - 22:45	30476	30473			
22:45 - 23:00	49480	49821			
23:00 - 23:15	48498	49114			
23:15 - 23:30	47469	48440		30.12.2020	23:15 - 23:30	47469
23:30 - 23:45	46580	47699		30.12.2020	23:30 - 23:45	46580
23:45 - 00:00	45679	47199		30.12.2020	23:45 - 00:00	45679
				31.12.2020	00:00 - 00:15	46494
31.12.2020				31.12.2020	00:15 - 00:30	46076
				31.12.2020	00:30 - 00:45	45681
00:00 - 00:15	46494	46179		31.12.2020	00:45 - 01:00	44900
00:15 - 00:30	46076	45311		31.12.2020	01:00 - 01:15	44554
00:30 - 00:45	45681	44493		31.12.2020	01:15 - 01:30	43957
00:45 - 01:00	44900	44022		31.12.2020	01:30 - 01:45	43725
01:00 - 01:15	44554	43329				
01:15 - 01:30	43957	42800				
01:30 - 01:45	43725	42531				

Time series should be harmonised further. Big consumption (net/gross generation) from CCGTs may not be consistent with the methodology.

A proposal for a new standard for transparency to support decarbonisation

The Platform reflects an idea of a powers system of the late nineties, but tend to ignore recent developments such as batteries, even utility scale ones, that are completely ignored, since there is no "Production Type" for them. The same applies for electrolysers, P2G, demand response, and resistors.

With the growing share of renewable and distribute generation, and improvement in telecommunications (smart meters, "virtual" power plants). More information should be published on hourly CO_2 levels for different technologies. This proposal would help a fully integrated, interconnected and digitalised EU energy market that promotes innovative technologies and modern infrastructure.

With net metering more and more encouraged by governments, TSOs should also provide their best estimates of industrial and residential self-generation, consistent with the Total Load requirements outlined above.

On balancing integration, ENTSO-E should ensure the publication of aggregated data of accepted volumes and prices by bidding zone. Data related to cross-border balancing bids placed on the TERRE, PICASSO and MARI platform and bids dedicated to the national ancillary services and balancing market should be reported separately.

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Contact

Lorenzo Biglia
l.biglia@efet.org

www.efet.org