

EFET response to ENTSO-E consultation on Amendments to the Manual of Procedures of the Transparency Platform

Brussels, 14 August 2023 - The European Federation of Energy Traders (EFET) welcomes the opportunity to provide comments to ENTSO-E's consultation on amendments to the Manual of Procedures (MoP v3r4) of the Transparency Platform.

EFET acknowledges that the proposed amendments to the existing documents Detailed Data Descriptions and Business Requirements aim to better reflect the new requirements of the Transparency platform.

Key messages

1. Ensure deanonymisation of all the constraints that have an impact on available cross-zonal capacity. ENTSO-E should request the Nordic region TSOs to identify and remedy all the limitations to the publication in accordance with transparency requirements.
2. Include in this amendment process the publication of information on available capacity of batteries, electrolysers, P2G, demand response, and resistors.

General comments

In general, the proposed amendments to the Manual of Procedures seem sensible and EFET supports them. However, we consider that this process should be used to introduce additional services, as outlined in our response to the ENTSO-E Transparency Platform survey, from 23 December 2022.¹

Providing full transparency and deanonymising constraints

Available cross-zonal capacity is one of the most important fundamental information in an integrated European electricity market. Constraints that limit the level of cross-zonal capacity should be made publicly available, so that market participants can adequately bid in the market and contribute to electricity price formation.

¹ [EFET response to ENTSO-E Transparency Platform survey, 23 December 2022](#)

With the application of the flow-based capacity calculation methodology, deanonymisation of all the constraints becomes crucial. ENTSO-E should insist that the TSOs/regions (in particular in the Nordic region) anonymising constraints avoid such practice and focus on providing the necessary identification that enables market participants proper assessment of available cross-zonal capacity.

There is no alternative to transparency around all the constraints that affect cross-zonal capacity.

Publication of information on available flexible capacity

With the growing share of renewable, distributed generation, different types of storage technologies, and improvement in telecommunications (smart meters, “virtual” power plants), more information should be made available with regard to flexible capacity.

This amendment process should include the publication of information on available capacity of batteries, electrolysers, P2G, demand response, and resistors. More information is also needed on hourly CO2 emission levels for different technologies. This would facilitate a fully integrated, interconnected, and digitalized EU energy market that promotes innovative technologies and a modern infrastructure.

Transparency around flexible capacity and granularity related to CO2 emission levels for different technologies would set a new standard that supports decarbonization.

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