TO: ACER – Agency for the Cooperation of the Energy Regulators
TO: ENTSO-E – European Network of Transmission System Operators for Electricity

Public opinion about the establishment of European Network Code Stakeholder Committees

First of all, a lot of thanks to ACER and ENTSO-E for organising this important consultation.

This opinion represents an opinion of an individual citizen, not any legal entity.

This opinion does not contain:
   — any business secrets
   — any trade secrets
   — any confidential information.

This opinion is public.

ACER and ENTSO-E can add the PDF file of this opinion to a relevant web page.

Annex 1 holds information about previous consultations.
Annex 2 holds information about disclaimers and copyright.

Best Regards,

[Continues on the next page]
General: Previous consultations

I gave earlier opinions to ACER, and PDF files of those opinions are on the following page:

EN: Opinion 34: REMIT Registration Format
http://www.jukkarannila.fi/lausunnot.html#nro_34

EN: Opinion 43: Publication of extracts of the European register of market participants
http://www.jukkarannila.fi/lausunnot.html#nro_43

EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
http://www.jukkarannila.fi/lausunnot.html#nro_53

EN: Opinion 55: European Energy Regulation
http://www.jukkarannila.fi/lausunnot.html#nro_55

SO, in this Opinion there should be some new insights about the establishment of European Network Code Stakeholder Committees.

Limitation: Opinion of an individual citizen – not any legal entity

Since this opinion is created by an individual citizen, the knowledge base for this consultation is naturally rather limited, since there has not been a group of experienced experts writing this opinion.

About the proposed IT platform / This opinion is mostly about information technology

There are different opinions listed on the annex 1 page. In many cases opinions have been about information technology issues. It can be noted, that also this limited opinion presents some observations about information technology.

NOTE: This opinion is mostly about the proposed IT platform.

More and more different codes and/or identifiers (ID)

On previous consultation documents are different observations about different codes and/or identifiers (ID).

It can be noted, that the number of different codes and/or identifiers (ID) is increasing gradually in different application fields – some codes and/or identifiers (ID) are private and some codes and/or identifiers (ID) are public.

In reality different codes and/or identifiers (ID) are layered and there can be several versions for different codes and/or identifiers (ID).

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The following figure is a conception of different layered information systems.

Like the figure indicates, there can be several formats (FA-FD and FI-F6) to be used in different information systems. Different information systems have also internal identifiers (ID) and external identifiers (ID) for (possible) public usage. The added value for different stakeholders is provided by combination of different identifiers (ID) in a specific information system.

Proposal: The could be some assessment(s) based on different versions of different codes and/or different identifiers (ID).

It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible, that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers (ID), but this consolidation means some serious technical and administrative actions.

Like the next figure indicates, there are databases in different information systems. Then there are different documents for transmitting data between different system.

Here we can note especially following standardisation needs for different parts of the proposed IT platform:

* communication standards
* data standards (also document standards)
* database standards
* display / interface standards.

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Proposal: There could be different standardisation efforts for communication, data, document, database, display/interface standards.

Horizontal standards and vertical standards for system-to-system communication

In previous opinions I have advocated developing different horizontal standards.
Proposal: The could be some assessment(s) for comparing different horizontal standards.

Proposal: The could be some assessment(s) for comparing different vertical standards.

One example of an horizontal standard is the email standard, since there are several vertical systems, which comply with email standards, and email messages can be transmitted between different email systems based on very different technological solutions.

Proposal: Developing different horizontal standards could be favoured.

Different timeframes for different information systems

Like the previous figure indicates, there is difference between realtime systems and other systems.

Proposal: There can be different realtime systems, and the need for different realtime systems could be assessed.

Proposal: There can different systems with other timeframes, and the need for systems should with different timeframes could be assessed

In some cases there is a clear need for different replicated information systems.

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Need for different interfaces and different displays

Previous proposal leads to a need for different interfaces and different displays. It can be noted, that different stakeholder groups need different interfaces and different displays.

Proposal: There could be some serious assessment about different interfaces and different displays.

In previous consultations I have advocated standardising interfaces and displays.

Proposal: After some serious assessment there could be some serious work for standardised (SPEX) interfaces and displays.

It can be noted, that several systems could implement (SPEX) the same parts of different processes,
even though the technology in different systems can be totally different.

**Different life-cycles between different information systems**

In reality, there are different life-cycles between different information systems. Like previously noted, there can be different documents for transmitting data between systems – also system-to-system communication is possible.

In some cases extraction of data from an old system to a new system may be very difficult. Like noted before, there can be some legacy systems, and those systems can mean serious problems in the near future.

**Difference between requirements and features**

It can be noted, that network codes mean developing different information technology (IT)
solutions, and network codes mean different IT projects – this is not a news item. However, different requirements for an IT system can be described in many ways, and there can be mismatches between features and requirements. Also, the division of labour between humans and computers can cause problems, and there are always real possibilities for creating cumbersome IT solutions.

Note: Previously mentioned standardisation (SPEX) of interfaces and/or displays can be realised with very different information technology solutions.

There could be division for back-office systems and front-office systems. It is clear that the proposed IT platform is about front-office system, since it is proposed to be open for (all?) interested stakeholder groups.

Proposal: Back-office systems and front-office systems could be consolidated.

One example of back-office system and front-office system integration

In the previous consultations I have used web feeds as an example.

To be precise, there are some standards for web feeds: RSS 2.0 standard and Atom standards. There are different systems, which comply with these example standards (RSS and Atom) differently.

It can be noted, that different back-office systems (with a wide variety of different technologies) can implement RSS standards, and these RSS feeds can be used in the front-office systems. With this kind solutions front-office systems dont need direct system-to-system communications with back-office systems.

The current reality in different member states

Like said before, there can be a wide variety of different technologies to be selected to different information systems.

One problem is naturally complex system-to-system connections, and this can lead to very serious problems in the maintenance and development

2. http://www.rssboard.org/rss-specification,

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The next figure tries to describe this situation.

MSS = member state system

It can be possible in some member states (European Union), that the systems in a member state is highly interconnected.

One obvious solution is to have an European contact point, and different member state system could be connected.

MSS = member state system
EUCP = European Union contact point

In reality having one European Union contact point can lead to a situation with too many connections, and this can lead to different IT havocs when the European Union contact point is facing different problems.

Therefore it is better to have member state contact points. These member state contact points can

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collect needed information from different member state systems. In this way European Union contact point would have less pressure.

3

MSS = member state system
MSCP = member state contact point
EUCP = European Union contact point

It can be also noted, that different member state systems have different life-cycles. Some member state systems can be terminated in some timeframes. Also some new systems can be created to have more functions than the previously terminated systems.

Changes in the organising / organisational modes

Here can be noted, that there will be changes in different communities, and organising / organisational modes will change.

In many cases original community can grow larger. Then there is a question about communication problems and management problems in different communities. This problem can lead to division of the original organisation to smaller entities. Then these smaller entities can work more efficiently.

Note: The change in different levels will be a constant/enduring issue.

[Continues on the next page]
Proposal: Possibilities for reorganisations could be assessed when developing different codes for serious usage.

Owner, member or agreement?

Here we can note the difference between owners, agreements and members. In reality ownerships, agreements and memberships cause very complex networks, and those networks are changing all the time: divisions, mergers, ownership changes, agreement changes, cooperation with other entities, life-cycles, etc.

Question: Can different network codes take care of changes in ownerships, agreements and memberships?

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Proposal: There could be some considerations for assessing possible / future changes in
ownerships, agreements and memberships.

Different requirements for the proposed IT platform

In the previous consultations I have advocated following solution as the maximum solution for
different information systems:

* public sector institute owns the machinery and processor of the information system
* the machinery and processor are based on relevant open standards
* the operating system is based on an open-source solution
* public sector institute owns the source code of the information system
* public sector institute owns the database of the information system
* the database is based on open-source solution and on relevant open standards
* public sector institute owns all data in the information system.

Note: It is possible, that the maximum solution is not implemented for different
reasons.

In the previous consultations I have advocated following solution as the maximum solution for
different information systems:

Here we can note, that the proposed IT platform can be realised with different technologies – some
of those technologies are closed and open.

Proposal: There could be a more technical and more detailed consultation about the
technologies of the proposed IT platform.

One option is to create a detailed roadmap for different phases of the proposed IT platform. With
this roadmap it could be easier to develop the proposed IT platform.

Proposal: Detailed roadmap for the proposed IT platform could be created.

Proposal: Detailed roadmap for the proposed IT platform could part of more technical
and more detailed consultation about the proposed IT platform.

Note: In some consultations I have proposed a roadmap, which could gradually move
to the previously explicated maximum solution for different information systems

Good luck!!!

This opinion is quite limited. Hopefully, there are other constructive ideas presented in other
opinions. This remains to be seen.

[Continues on the next page]
ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the Commission of the European Union. General page to all consultations – both in English and in Finnish: http://www.jukkarannila.fi/lausunnot.html

EN: Opinion 1: Review of the rules on access to documents
http://www.jukkarannila.fi/lausunnot.html#nro_1

EN: Opinion 2: Schools for the 21st Century
http://www.jukkarannila.fi/lausunnot.html#nro_2

EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for Safe and Innovative medicines
http://www.jukkarannila.fi/lausunnot.html#nro_3

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
http://www.jukkarannila.fi/lausunnot.html#nro_5

EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
http://www.jukkarannila.fi/lausunnot.html#nro_6

EN: Opinion 8: European Interoperability Framework, version 2, draft
http://www.jukkarannila.fi/lausunnot.html#nro_8

http://www.jukkarannila.fi/lausunnot.html#nro_9

EN: Opinion 15: Collective Redress
http://www.jukkarannila.fi/lausunnot.html#nro_15

EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
http://www.jukkarannila.fi/lausunnot.html#nro_17

EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
http://www.jukkarannila.fi/lausunnot.html#nro_18

EN: Opinion 19: Official Acknowledgement by the Commission
http://www.jukkarannila.fi/lausunnot.html#nro_19

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EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
http://www.jukkarannila.fi/lausunnot.html#nro_20

EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
http://www.jukkarannila.fi/lausunnot.html#nro_21

EN: Opinion 23: Public consultation on the review of the European Standardisation System
http://www.jukkarannila.fi/lausunnot.html#nro_23

EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
http://www.jukkarannila.fi/lausunnot.html#nro_27

EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
http://www.jukkarannila.fi/lausunnot.html#nro_28

EN: Opinion 30: Internet Filtering
http://www.jukkarannila.fi/lausunnot.html#nro_30
NOTE: Organised by the European Committee for Standardization (CEN) 5

http://www.jukkarannila.fi/lausunnot.html#nro_32

EN: Opinion 34: REMIT Registration Format
http://www.jukkarannila.fi/lausunnot.html#nro_34
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) 6

EN: Opinion 35: Exploiting the employment potential of the personal and household services
http://www.jukkarannila.fi/lausunnot.html#nro_35

EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
http://www.jukkarannila.fi/lausunnot.html#nro_37

EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
http://www.jukkarannila.fi/lausunnot.html#nro_39

EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
http://www.jukkarannila.fi/lausunnot.html#nro_40

EN: Opinion 41: AT.39398: observations on the proposed commitments
http://www.jukkarannila.fi/lausunnot.html#nro_41

EN: Opinion 42: Opening up Education
http://www.jukkarannila.fi/lausunnot.html#nro_42


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EN: Opinion 43: Publication of extracts of the European register of market participants
http://www.jukkarannila.fi/lausunnot.html#nro_43
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 45: About ICT standardisation
http://www.jukkarannila.fi/lausunnot.html#nro_45

NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
http://www.jukkarannila.fi/lausunnot.html#nro_53
NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

EN: Opinion 59: Green paper on mobile Health
http://www.jukkarannila.fi/lausunnot.html#nro_59

EN: Opinion 60: Cross-border inheritance tax problems within the EU
http://www.jukkarannila.fi/lausunnot.html#nro_60

EN: Opinion 61: European Register of Products Containing Nanomaterials
http://www.jukkarannila.fi/lausunnot.html#nro_61

EN: Opinion 64: Corporate Social Responsibility - European Commission
http://www.jukkarannila.fi/lausunnot.html#nro_64

http://www.jukkarannila.fi/lausunnot.html#nro_66

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ANNEX 2

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7 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011
parliamentary elections in Finland challenge the three-party system, since three “old” parties were not traditionally
as the three largest parties. The is now a “new” party as the third largest party. We all must remain being interested
about this new development in Finland.

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