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Sent via email to: Remit.PublicConsultations@acer.europa.eu

Public consultation of common schema for the disclosure of inside information

Dear [REDACTED]

TenneT welcomes ACER's efforts to produce a proposal for the enhancement of the disclosure of inside information and the opportunity for us to provide input to this in order to contribute to a higher level of transparency in Europe's energy markets.

General comments

The processes for the disclosure of inside information affect a big share of our organization directly and accordingly do adjustments of these processes triggered by changes of the corresponding requirements. In order to implement the requirements in an effective and efficient way we try to automate the processes as much as possible – not least to ensure the consistency of published information. Therefore we would like to stress that any change of the requirements leads to necessary changes of our internal processes which in turn requires financial and human resources. It is also disadvantageous that after having adapted many processes for alignment with the 3rd ACER Guidance the new suggestions might require further updates. This seems inefficient in terms of costs and resources.

Additionally, a high degree of automation is necessary to make sure that the inside information is disclosed as fast as possible. Increasing the level of detail of the requirements goes along with an increasing level of complexity of our implementation which makes a publication of UMMs in a timely manner more difficult. In summary we would like to raise ACER's awareness to the costs that result from changes of the requirements.

The complexity also implies that any implementation of an updated Guidance will take considerable time. Based on experience with previous adaptations the Guidance should provide for an implementation period of at least one year.

Consultation questions:**1. Would you add any other field not included in the current proposal? If so, please explain your reasoning.**

From TenneT's view no additional field is necessary.

2. Would you remove any field represented in the current proposal? If so please explain your reasoning.

All of the following suggestions refer to transmission assets:

- #3 Event Status: This data field is not necessary. The included information is the same as in #2 *Update ID* and should therefore be removed.
- #10/a *Unavailability capacity*: This data field is redundant. The included information can be obtained by *Nominal Capacity* and *Available Capacity*. Furthermore, for all capacity information it is not clear how their influence should be evaluated, cf. answer to question 3.
- #18 *Market participant code* and #19 *Market participant*: The necessity of both pieces of information is not obvious. From our point of view the information regarding the *Market participant* (#19) should be sufficient for the identification of the market participant and more informative. Therefore data field #18 should be removed.

3. Would you change any of the descriptions, accepted values or applicability? If so, please explain your reasoning. Are the schemas or values that you are suggesting based on any industry standard? Which one(s)?

General question: In the consultation paper you explicitly mention "On the one hand, the Implementing Regulation defines new details on the publication of inside information and thus the 3rd edition of the ACER Guidance on the application of REMIT (ACER Guidance) needs to be amended accordingly."

It is not obvious for us which "new details" are referred to. Please explain which new details are meant.

We recommend reusing so far binding data fields according to ACER's 3rd guidance to minimize implementation efforts. Comparing ACER's 3rd Guidance with the description given in the consultation paper, the reuse potential seems rather limited.

In order to avoid inconsistencies with other publications and also to avoid double reporting we recommend to harmonize the definitions in general, e. g. for unavailable capacity under regulation 543/2013. Today, there are already different definitions:

- a) estimated impact on cross zonal capacity (EMFIP)
- b) affected Capacity of asset concerned (REMIT).

The definition under REMIT has probably been derived in analogy to that of power plant unavailability, where it is certainly applicable. However we would like to point out that for transmission assets the situation is partly different. The analogous treatment, especially with respect to the unavailable capacity, should not be taken too far. To explain this further:

- 1) In a meshed grid the unavailable capacity of one transmission line most of the time has no impact on the market as the power can be transmitted via other lines.

- 2) Planned unavailabilities of transmission lines connecting power plants are coordinated between TSOs and power plant operators. Maintenances, i. e. planned unavailabilities, of lines and plants usually happen at the same time. Thus there is no impact of the planned line unavailability (and in particular its unavailable capacity) on the possible feed-in of the connected power plant.
- 3) Planned transmission line unavailabilities are often discontinuous. This means that the line is unavailable e. g. only for the day-time while it is switched on again for the night. This makes it difficult to deal with the data fields #15 Event Start and #16 Event Stop.

These issues should be considered for the proper set of definitions of the information details published for an event as well as for answering the question which events have to be published in the first place.

4. Do you agree with the use of RSS or ATOM feeds to fulfill the requirement under article 10(1) of the REMIT Implementing regulation?

RSS and ATOM are the web feed techniques mostly used.

Sincere regards, (Kind regards,)
TenneT TSO GmbH

