

To:

Konstantin Staschus, Secretary General
Athanasios Troupakis, Market Advisor
ENTSO-E

Cc:

Alberto Pototschnig, Director
Christophe Gence-Creux, Head of the Electricity Department
ACER

Klaus-Dieter Borchardt, Director General
Matti Supponen, Policy Coordinator
European Commission, DG Energy

Friday, 16 October 2015

Subject: EFET concerns over the functioning of the ENTSO-E Transparency Platform (EMFIP)

Dear Mr. Staschus, dear Mr. Troupakis,

Since beginning of this year, data providers and owners in the European Union have the obligation to submit fundamental information related to electricity generation, load, transmission and balancing through the ENTSO-E Transparency Platform (EMFIP). The European Federation of Energy Traders¹, as a representative group of market participants and users of the fundamental data, welcomed the setup of the ENTSO-E Transparency User Group (hereinafter ETUG). We fully support and welcome this initiative and are grateful for the opportunity to participate in this project. We are ready to provide ENTSO-E with all the support needed and to work together to further develop a transparency platform that will be useful for all market participants.

We believe that an active leadership of ENTSO-E is crucial for the success of the ETUG initiative, and that progress is needed in that respect to meet the deadlines agreed in the group. Although we are aware that this project is complex and may consume significant ENTSO-E resources, we are concerned that the level of cooperation between TSOs observed over the last few months will not be sufficient to achieve the goals of the project.

¹ EFET promotes and facilitates European energy trading in open, transparent and liquid wholesale markets, unhindered by national borders or other undue obstacles. EFET currently represents more than 100 energy trading companies, active in over 27 European countries. For more information: www.efet.org.

At the first ETUG meeting in April, the data quality and data download problems were clearly identified as the most important challenges for the platform users. The group members' comments and suggestions were submitted to ENTSO-E shortly after the meeting to provide ENTSO-E with enough time to consider the comments and prepare its feedback for the second meeting in June. However, the feedback from Unicorn on the Data Download subgroup suggestions was never shared with members of the group. Nor was any clear plan disclosed on what features could be implemented in the near future.

At times, we have been disappointed by the lack of communication on the side of ENTSO-E. The active discussion of the group members rarely receives any feedback, and on occasion, e-mails have remained unanswered. The FTP solution was strongly supported by the group as a quick-win achievable by the end of 2015. However, the internal ENTSO-E considerations concerning this proposal and possible other solutions have not yet been shared with the ETUG members. The discussion on specifications was postponed to the third ETUG meeting (which was itself postponed from September to October).

A list of selected data quality and presentation issues can be found in the appendix below.

We would like to encourage ENTSO-E to take a more active approach to address the suggestions to improve the data download and data quality issues, and to coordinate TSO cooperation in that regard, keeping in mind that some quick-win solutions are essential, and should be implemented as soon as possible.

We would also like to highlight that some data remains entirely missing from the platform, despite the fact that the corresponding legal obligation applies since January this year. We urge ENTSO-E to take action to remedy this situation and ensure individual TSOs' compliance with the legal framework regarding data publication as soon as possible.

Yours sincerely,



Jan van Aken, Secretary General

Appendix

Selected data quality and presentation concerns to be addressed:

- The day-ahead data for cross-border commercial schedules are being overwritten with intra-day values instead of being published separately.
- Unavailabilities of sub-periods are not appropriately published on EMFIP whereas national platforms publish them in a correct way. For example, with hydro, maintenances are usually done in precise slots during several weeks. Thus the asset is not unavailable during the overall period but during sub-periods only.
- It is not possible to pair the original announcement of an unavailability of certain assets with further updates. There is no indicator that would identify the files containing data on the same outage.

Note that this list of concerns is not exhaustive and further concerns may be raised at the occasion of the next ETUG meeting(s).