

MINUTES

ENTSOG 7th Transparency Workshop

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at ENTSO-E Conference Centre, Av. de Cortenbergh 100

Company	Name	Company	Name
ENTSOG	Panagiotis Panousos	GIE	Marion Nikodym
ETNSOG	Davide Volzone	GRTgaz Deutschland GmbH	Mélissa Hilaire
ENTSOG	Anne-Marie Colbert	Eustream,a.s.	Milan Sedlacek
ACER	Juan De Miguel	Gestore dei Mercati Energetici	Natascia Del Papa
DG Energy	Andras Hujber	ENTSOE	Peter Campbell
Fluxys	Ils Guedens	BOG	Philipp Schlechter
National Grid	Robert Westmancoat	Platts	Siobhan Hall
UPRIGAZ	Alain Raoux	REN	Victor Baptista
Swedegas AB	Alexander Ehrensward	Transgaz	Wilhelm Untch
TIGF	Alexandre Martin	Eustream,a.s.	Miroslav Hajach
Shell Energy Europe	Amrik Bal	Bayernets	Björn Thiele
BP Gas Marketing Ltd	Andrew Pearce	FGSZ	Károly Jenei
Gasunie Deutschland Services GmbH	Annett Wilde	EDF	Amroze Adjuward
Gasum Oy	Anni Nuppunen	DG Energy	Tanja Held
Bulgartransgaz	Boryana Brangova	GASCADE	Niklas Schäfer
Transgaz	Carmen Pangalean	TU Delft	Irene Anastasiadou
Interconnector (UK) Ltd	Lucy Manning	GAZ-SYSTEM S.A.	Joanna Anisimowicz
CREG	Geert Van Hauwermeiren	Mutual Energy Limited	Lauren Skilen-Baine
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1. Opening

Mr Panagiotis Panousos, Business Area Manager System Operation, welcomed everybody in the 7th Transparency workshop.

2. Session 1: Upgrade of Transparency Platform and New Transparency Platform

P. Panousos, introducing the project, gave the background and motivation for this. Transparency Platform (TP) was originally introduced in 2007 (Madrid Forum) and launched in 2009 as a voluntary one. Amended TRA guidelines (24 Aug 2012) made TSOs' participation obligatory and defined fully the set of data to be uploaded. Still, interrelations between codes and guidelines developed, under development or foreseen for the future, are expected to make its scope wider in the future. Yearly TRA WSs are a good chance for ENTOSOG to present developments and receive stakeholders' feedback.

D. Volzone explained the legal obligations, the new features of the upgraded TP in detail and what is to be expected by the news TP (to be launched by Sep 2014).

J. de Miguel from ACER Gas Department presented the results of their monitoring of compliance with transparency requirements from Chapter 3, Annex 1 to Reg. 715/2009, for 2011 and 2012, the opinion on harmonized format for data publication, their preliminary views on ENTOSOG's upgraded TP and the latest developments. In conclusion J. de Miguel acknowledged significant efforts done by TSOs and ENTOSOG for improving transparency in the information published, but mentioned that still improvements are required in certain aspects (inclusion of all TSOs and relevant points in TP, export wizard, near real time data). ACER wants to rely on ENTOSOG to get data for their reports (market monitoring, monitoring of congestion at IPs).

Q&A from the Session 1

Q: Regarding CMP data in the TP, is it possible to see also future capacities surrendered or is it only for the past?

A (ENTOSOG): We will internally discuss this and a solution will be provided

Q: It is positive that the TP will also include REMIT requirements. Is there any distinction made between inside information and transparency data that have to be published?

A (ENTOSOG): In the regulation, it is a clear distinction what kind of information is considered to be inside and it has to be published in a website/platform and the data that market participants have to report.

Q: Sometimes data description used in the TP is misleading, like the "planned

interrupted capacity”.

A (ENTSOG): These come from the regulation and Transparency guidelines. Nevertheless, we will explore this and perhaps a commenting note can be used.

Q: Stakeholders request bigger granularity and shorter refresh rates for data in the TP. How do you respond to this?

A (ENTSOG): Current upgrade offers daily data which are updated on an hourly base. This is a big step forward if compared to the previous situation. The new platform in 2014 will offer the possibility for TSOs to upload hourly information and the refresh rate will go down to 15 min. EntsoG hopes this will cover the market expectations.

Q: Regarding the request for more data, can the market accept that these will only be provisional? Is there merit in publishing provisional values?

A (EC/TSO): Even provisional data can be better than no data at all. They can be published with a disclaimer (position expressed by EC). This is at least the outcome from the electricity market.

Q: Are there more statistical data available regarding access to the TP, like which tools, points are used more?

A (ENTSOG): Statistical tools give more details than the ones presented, but we have to explore how to use them and present.

Q: Can the TP accommodate hourly data or within the hour information?

A (ENTSOG): The current platform can only display daily data, but there is an hourly refresh rate. Hourly data will be possible in the new TP.

Q: Regarding CMP data, when TSOs had to implement IT solutions, it was discovered that definitions were not clear. TSOs discussed some of them within ENTSOG and through cooperation between ENTSOG and ACER, expectations were better defined. But there were much more not discussed. Could there be a future platform established where there is cooperation when it comes to implementation of regulation requirements?

A (ACER): By looking at the regulation, there is always room for different interpretations of the requirements. That's why the cooperation between ACER and ENTSOG was very useful. TSOs have to work within ENTSOG so that a common approach in implementation is reached, which is agreed with EC and ACER.

A (TSO): It is true that TSOs faced big difficulties when IT solutions for implementation had to be developed, and this caused delays. There are different IT systems behind and streamlining takes time. Finding the right definition is part of this exercise. An example is the definition of “interruption”. At national level this can be seen from a different perspective.

Q: Wouldn't it be better if for CMP monitoring report to be prepared by ACER, ENTSOG gathers the data for this year, as not all TSOs were able to upload their data in the TP?

A (ACER): Yes, this would be a good solution for ACER.

Q: Is there any vision for combining TP and NeMo tool used for TYNDP? Are there any technical data to be present in the TP?

A (ENTSOG): For the time being, two different data bases are used, but ENTSOG assures coherence. In the new TP, the data base will be the same as the one used for all ENTSOG reports. Regarding technical data, the TP is mostly the place for commercial related information. Technical data are very limited (like physical flows).

Q: Regarding transparency compliance table for TSOs presented by ACER, there is a shared responsibility between TSO and relevant NRA when there is no full compliance. Compliance should only be 100% for all, and when this is not the case, normally the NRAs should have reacted. Therefore the columns of this table should name both the TSO and the NRA.

A (ACER): TSOs are responsible for implementing the regulation, that's why they are named in the table. Of course the NRAs are expected to take actions. Data cannot be presented at a country level as there are countries with multiple TSOs.

3. Session 2: REMIT implementing acts

András Hujber gave a presentation of EC REMIT implementing acts, focusing on the data TSOs will be requested to send and the expected timeline.

Two TSOs, Fluxys and National Grid, presented their experience from their participation in ACER data collection pilot project for REMIT.

Q&A from the Session 2

Q: Regarding implementing acts, should transportation contracts between TSO and shipper considered as standard or non-standard? This of course is related to when data is to be reported. Is a platform for exchanges considered to be an organized market?

Will the TSOs have enough time to implement data provision, since ACER will have the responsibility to develop proposal for the format?

A (EC): There are separate tables that are developed especially for reporting gas transportation contracts and for secondary market. Basically they can be considered as standard, but it actually depends on the content. For the platforms it's the same. ACER will provide all necessary information in a timely manner. Nevertheless, if timeline for implementation is considered too strict, comitology members can propose a delay.

Q: First of all, as a TSO I would like to thank those TSOs that put some much effort and participated in ACER's pilot project for data collection. What should be clearer in the presentations is the bottlenecks confronted, like availability of resources, external data to be collected. It is foreseen that TSOs activity related to transparency and REMIT will increase dramatically in 2014. Are all NRAs aware of this, as costs will be generated for the market?

A (TSOs): The scope for TSOs participation in the pilot project was limited either to dummy data or to one IP/shipper. So, there was no extra involvement or investment from IT. But, it was clear that, now that the implementing acts require data reporting for all bookable points and disaggregated per shipper, and if this is to be done next day, there will be considerable effort and investment related to IT. Being ready in the end of 2014 is a big challenge for TSOs.

Q: Has there been any CBA for REMIT?

A (EC): This was performed at the beginning. Now we are only talking about the implementation details. For sure NRAs shall consider all involved costs, as they will be the ones finally receiving the relevant data and be responsible for proper market operation.

Q: Some TSOs have to send data both to their NRAs and ACER. This is double reporting. Will there be any harmonization to that?

A (EC): This has to be fixed. Perhaps when data reporting to ACER starts, NRAs will realize that they can rely on the data made available through this reporting mechanism and not ask for more.

Q: As said, implementation of data reporting from TSOs to ACER is very challenging. Will the draft implementing acts, sent for comitology, be made available for information? Will timeline change?

A (EC): For the time being, timeline will remain unchanged. It can change during comitology process. The draft is to be sent to comitology members, but might also be sent to REMIT WS participants.

Q: What are the non-standard transactions to be reported by TSOs?

A (TSO): TSOs consider that they have to report only fundamental data.

Q: Regarding frequency of reporting for TSOs, reporting on the next day requires significant costs. Data will be analyzed when checking for market abuse cases. Is it so urgent this to be done next day and not next month?

A (EC): There has to be a balanced way to treat this which is related to data from financial market. We are not asking for real time data and this is already a compromise for damages that can come from market abuse.

Q: Could the analysis be based on aggregated data per point and if there are signals for market abuse, then ACER could request disaggregated data from the TSO?

A (EC): Regulation requires monitoring the behavior of market participants and this cannot be done with aggregated data. It has to be understood that these checks will be performed automatically by intelligent IT tools.

Q: Do intra-group transactions / contracts have also to be reported?

A (EC): No, these are of no interest, unless they are performed in an organized market.

Q: If in a single IP there is only one shipper involved, can there be market abuse?

A (EC): In a perfectly isolated environment, no. But, this is not the case for current systems. One point is related to others.

Q: When a market participant reports under financial market it is not expected to report under REMIT. Is it true also for the other way round, when you report under REMIT you don't have to report under financial market?

A (EC): This is not easy, as then the financial market should be able to receive ACER data.

Q: For reporting fundamental data should there be a non-disclosure agreement with shippers?

A (EC): No, this was the case only for the pilot project. When the implementing acts are in force, this will not be necessary.

Q: ACER will have to launch a huge IT project. Will they be ready?

A (ACER): Yes, ACER is working hard to be ready by the deadline. It's a challenging task with big costs and resources involved.

Q: Is there a definition of the standard framework agreement?

A (EC): This is in the draft, nothing has been changed.

4. Session 3: FG Tariff requirements on Transparency

Ann-Marie Colbert, ENTSG subject manager on Tariff network code project, presented briefly the framework guidelines' requirements on transparency regarding tariffs and gave the basic milestones and expected stakeholder involvement in the process.

J. de Miguel from ACER gave more details for Transparency requirements in the Tariffs FG, saying that the objective is to allow network users to be fully aware of the costs underlying transmission services and obtain a reasonable degree of tariff predictability.

Q&A from the Session 3

Q: TSOs have to publish tariff related data on their websites. Will they have also to publish on ENTSG TP?

A (ACER/ENTSG): There shall publication at national level as well as European level. This will of course be consulted during the development of the network code. It is true that the framework guidelines foresee a lot of related information to be made publicly available.

Q: Apart from publication, will there also be data provision to NRA or ACER?

A: Framework Guidelines foresee data to be provided to ACER to perform implementation monitoring. Data to be published will be the necessary for network users to perform their activity.

5. Conclusions

P. Panousos gave the conclusions of the WS (included in the slides), thanked the

participants and invited all stakeholders for feedback on the TP.

