

## **MINUTES**

### **ENTSOG 8<sup>th</sup> Transparency Workshop**

**11 December 2014, 10:00 – 16:00**

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

#### **1. Opening**

Mr. Vittorio Musazzi, ENTSOG General Manager, welcomed everybody in the 8<sup>th</sup> Transparency workshop.

#### **2. Session 1: 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. A New Transparency Platform was launched by ENTSOG on 1<sup>st</sup> October 2014 with the use of the last IT technologies available. Yearly TRA WSs are a good chance for ENTSOG to present developments and receive stakeholders' feedback.

D. Volzone explained the legal obligations, the new features and tools of New TP in detail.

M. Gerova from Bulgartransgaz described the efforts done by the Bulgarian TSO in order to participate in the New ENTSOG TP on time.

A. Bonzanni from the EFET showed the traders' views on ENTSOG Transparency Platform. Lewis Hodgart from ACER Gas Department presented the results of ACER assessment on data publication in the ENTSOG TP and the possible improvements to be done.

Francois Levelle from CRE and Valerie Handschuh from BNetzA presented the French and German NRAs' views on the New ENTSOG TP with useful advices for ENTSOG TP improvements.

In conclusion the EFET, ACER and NRAs acknowledged significant efforts done by TSOs and ENTSOG for improving transparency in the information published, but mentioned that still improvements are required in certain aspects (data quality, inclusion of all TSOs and relevant points in TP and export wizard).

### **Q&A from the Session 1**

- Q (CEFIC): Who can now upload Urgent Market Messages in the platform? Can market participants do it or is it just for TSOs? What is the delay for that? According to the regulation it must be within an hour.
- A (ENTSOG): For the time being only TSOs. TSOs upload their messages as soon as they have such kind of information
- Q (ICIS): Transparency data are now published on the ENTSOG platform and also on the TSOs websites. What will happen in the future? Will TSOs stop publishing on their websites and everything will be only on the platform?
- A (ENTSOG): No, ENTSOG platform has a specific role for the publication of a set of data described in the regulation. TSOs publish much more information on their websites and this will remain in the future.
- Q (BNetzA): ENTSOG declares as an ambition to be responsive to market needs. What is the channel for this when it comes to transparency requirements?
- A (ENTSOG): There is no specific channel, but through workshops and bilateral meetings we are trying to collect all requests, and also discuss and exchange views on the costs and benefits of such requests. We always prefer to have a dialogue instead of web-based consultations.

- Q (Swedegas): There is now a possibility for TSOs to upload hourly data on the platform. Will this be mandatory in the future?
- A (ENTSOG): This actually depends on the national framework.
- Q (ICIS): There is some feedback received by platform users and it seems that data is not always uploaded quickly enough; they are not always sure about accuracy. So, users prefer to get data from the TSOs' websites.
- A (ENTSOG): We are trying to solve issues related to downloading speed. We have already updated our platform. Regarding accuracy, this depends on the TSOs. Normally they upload the same data both on the platform and their websites, so it should not be a problem.
- Q (ONTRAS): Market needs data the soonest, so they ask for speed. TSOs give priority to quality, as market decisions are based on their data. How is this safeguarded?
- A (ACER): Both are necessary. But roles are defined. ENSTOG has to make sure that the tools are available and functional. And then TSOs are responsible for the accuracy and speed of uploading their data.
- Q (ICIS): Have you harmonised the units for the data in the platform?
- A (ENTSOG): We have created a table which exactly defines the data that has to be uploaded and the units to be used. This table is available through the platform, so that users can understand the data they see.
- Q (ICIS): How does inside information affect trading?
- A (EFET): Trading is based on information. So there is a risk when you trade on information that might not be correct, or when you do not have information that another party has. The platform now has a part for publication of market messages by TSOs, but a lot of work is necessary if we finally want to have all relevant information on only one platform.
- Q (CEFIC): Do the TSOs want to finally have only one platform for all market

messages?

- A (ENTSOG): We are discussing on that. The idea seems valuable. But there are two main issues which have to be investigated: technically this platform should always be available, and this is not the case for the current, as regular maintenance will cause unavailability; then the administration of the platform should create the confidence that the users have the right and responsibility of their published messages.
- Q (Sisman): Through the discussion it seems that we need new regulation for the correct provision of data through the platform. Aren't all the regulatory tools already there? It is clear that through the implementation of the new rules coming from the network codes market requirements for timely information will grow. Hourly indications will be a necessity. Shouldn't we be pro-active to these needs? And first of all, shouldn't we solve all technical problems?
- A (ACER): Nobody really said that we need new regulations. We need to implement what already exists.
- A (ENTSOG): Technical problems will be solved by the end of January. Regarding the hourly data, this actually depends on the national systems in place, and this will not be harmonised even with the implementation of the network codes (different implementation deadlines, possibility for different models foreseen). But, if TSOs should be pro-active to market needs depend very much on the agreement they must have with their regulatory authority.
- Q (ICIS): It seems that accuracy of the data is a big issue. What does ENTSOG intend to do about it? Increase resources perhaps?
- A (ENTSOG): It is in our plans to create certain software tools for TSOs to be able to check the quality of the data they upload. Perhaps we will have also a tool to check availability. But, of course accuracy remains a TSO responsibility.
- A (TIGF): The platform provides direct contact links of the responsible person within

each TSO. Users that face problems with accuracy or data missing should contact directly the TSOs and ask for information. Many times the reasons behind are quite simple.

- Q (BnetzA): In the previous platform, if a TSO had no re-nomination to upload, this appeared to be a gap in the data table, as if the TSO uploads no data. Has this been solved in the new platform?
- A (ENTSOG): We will solve such issues soon. For example we have cases where some data fields are not applicable to a number of TSOs and this should be indicated in the data.

## **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.

Ilse Guedens from Fluxys presented its experience from its participation in ACER data collection pilot project for REMIT.

## **Q&A from the Session 2**

- Q (GCA): If a national regulatory authority requests data reporting similar to that foreseen by REMIT, isn't it double reporting, since similar data will also have to be reported to ACER by the implementation deadline?
- A (EC): We are aware that in some countries parallel reporting is foreseen, perhaps with different deadlines and different set of data. This should be avoided and can be harmful to the correct implementation. REMIT implementing acts, when adopted, will be directly applicable at national level. When reporting according to REMIT is implemented, national regulatory authorities will be able to get the data they want through ACER.

- Q (ITG): In REMIT it is foreseen that a market participant can provide the data through a third party. Are there specific rules for that?
- A (EC): This is left to the market participants. EC does not plan to issue any details. Perhaps ACER could include it in guidelines. The main thing is that there must be an agreement between the parties. It is clear that both become responsible. Also in financial market similar things are foreseen.
- Q (UPRIGAS): If there are abnormal transactions in market places, who is responsible to report?
- A (EC): When you operate a market place you are responsible for monitoring its operation. And then it is ACER that should have the full overview.
- Q (GCA): Will the xml message created for the TSOs reporting to ACER be made available?
- A (Fluxys): Yes, it will most probably be part of the manual.

### **Session 3: FG Tariff requirements on Transparency**

Arthur Malcolm, ENTSOG subject manager on Tariff, gave the background and motivation for the Tariff NC. Irina Oshchepkova presented the requirements on transparency regarding tariffs and showed the stakeholders' expectations.

### **Q&A from the Session 3**

- Q (Sisman): Regarding tariffs setting, users want to have full transparency in all charges included. They want to understand the basis of the dedicated services costs. ENTSOG proposes TSOs to give a simplified model for the users to be able to calculate the tariffs. But this will not give them the chance to replicate the tariffs and have a full understanding of what they are expected to pay. They need more than estimation.
- A (ENTSOG): TSOs cannot provide a full model, because this can include all their systems and commercial sensitive information. Nevertheless, the simplified model should use the same

engine and should produce a very good estimation, as well as the trends till the end of the regulatory period.

- Q (CEFIC): Still, with the TAR NC proposed, there won't be harmonisation of tariffs, as different methodologies are foreseen and a lot of parameters.
- A (ENTSOG): True, but the number of methodologies is restricted.