8th ENTSOG Transparency Workshop Brussels, 11th December 2014



European Federation of Energy Traders

EFET perspective

New ENTSOG Transparency Platform Andrea Bonzanni Regulatory Advisor, EDF Trading







- 1. EFET feedback on Gas Roads
- 2. ENTSOG Transparency Platform: improvements
- 3. ENTSOG Transparency Platform: shortcomings
- 4. EFET transparency initiative
- 5. ENTSOG Transparency Platform: REMIT functionality

ENTSOG Transparency Platform: EFET feedback on Gas Roads



- Parameters to be published:
 - Near real-time gas flows, updated as a minimum on an hourly basis
 - Daily and within-day available capacity
 - Physical amount of gas in the system (linepack) on an hourly basis and estimation of end-of-day linepack level
 - Aggregate system balancing information updated on an hourly basis
 - Main gas quality parameters updated on an hourly basis
- Information to be presented on the basis of each Virtual Trading Point (VTP), not routes
- Information should be shown for all points, not only IPs
- Improve accuracy and reliability



- More user-friendly layout (using Internet Explorer v10+ or Firefox)
- Data are easy to scrape; can be exported/downloaded automatically
- Data search function by virtual trading point
- Comprehensiveness of data that can be accessed:
 - Storage points
 - Hourly data
 - Maintenance plans and outages
- Graph section for each point

ENTSOG Transparency Platform: improvements

- Graph section allows comparing indicators at both sides of a border ٠
 - Facilitates dealing with discrepancy in technical capacity or even physical flows

					Hourly data Daily data
•				150M	Current Timezone
				1901	CET
				140M	From Gas Day
					2014-11-05
<u>+</u>				130M	To Gas Day
					2014-12-04
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ENTSOG Transparency Platform: improvements



- Graph section allows comparing indicators at both sides of a border
 - Facilitates dealing with discrepancy in technical capacity or even physical flows





- IT could be improved:
 - Browsing can be very slow
 - Frequent need to refresh and restart search
- No longer possible to search data by route
 - Useful for alternative routes
- Some relevant points not available (e.g. VTPs)
- Quality of data
 - Inconsistencies
 - Fields not populated
 - Delays in publication

ENTSOG Transparency Platform: shortcomings

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Point	Operator	TSO Point Identifier	Direction	Period	Indicator	Value	Status	Last update date	CET
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	25/10/2014 05:00 - 25/10/2014 06:00	Nomination	0 kWh/h		23/10/2014 15:04	From Gas Day
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	25/10/2014 04:00 - 25/10/2014 05:00	Nomination	0 kWh/h		23/10/2014 15:04	2014-10-21
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	25/10/2014 03:00 - 25/10/2014 04:00	Nomination	0 kWh/h		23/10/2014 15:04	To Gas Day
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	25/10/2014 02:00 - 25/10/2014 03:00	Nomination	0 kWh/h		23/10/2014 15:04	2014-10-25
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	25/10/2014 01:00 - 25/10/2014 02:00	Nomination	0 kWh/h		23/10/2014 15:04	
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Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	24/10/2014 22:00 - 24/10/2014 23:00	Nomination	0 kWh/h		23/10/2014 15:04	RENOMIN. ALLOCATI
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry 🗲	24/10/2014 21:00 - 24/10/2014 22:00	Nomination	0 kWh/h		23/10/2014 15:04	PHYSICAL
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	24/10/2014 20:00 - 24/10/2014 21:00	Nomination	0 kWh/h		23/10/2014 15:04	GCV
Showing 1 to	o 10 of 166 entries							Show 10 - entries	WOBBE IN
									INTERRUPTIC

No nominations at Reckrod between OGE and GASCADE?

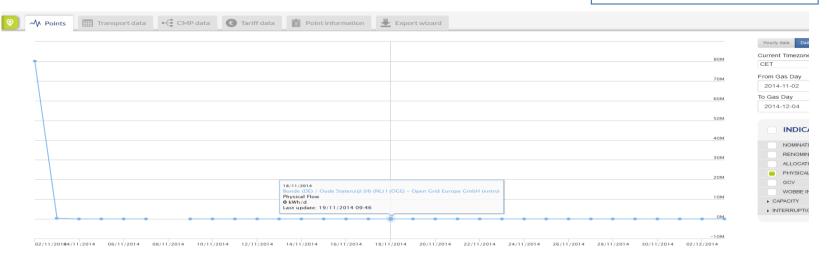
Lack of "status" indicator is confusing!

ENTSOG Transparency Platform: shortcomings



Point	Operator TA	TSO Point Identifier ▼▲	Direction	Period ▼▲	Indicator	Value ▼▲	Status ▼▲	Last update date
Point	Operator	TSO Point Identifier	Direction	Period	Indicator	Value	Status	Last update date
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	03/12/2014 06:00 - 04/12/2014 06:00	Physical Flow	28,366,444 kWh/d	•	04/12/2014 09:02
Reckrod	Open Grid Europe GmbH	37Z00000004923T	exit 🗪	03/12/2014 06:00 - 04/12/2014 06:00	Physical Flow	0 kWh/d	•	04/12/2014 10:32
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	02/12/2014 06:00 - 03/12/2014 06:00	Physical Flow	27,922,354 kWh/d	•	03/12/2014 09:02
Reckrod	Open Grid Europe GmbH	37Z00000004923T	exit 🗪	02/12/2014 06:00 - 03/12/2014 06:00	Physical Flow	0 kWh/d	•	03/12/2014 10:44
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	01/12/2014 06:00 - 02/12/2014 06:00	Physical Flow	21,103,715 kWh/d	•	02/12/2014 09:02
Reckrod	Open Grid Europe GmbH	37Z00000004923T	exit 🗪	01/12/2014 06:00 - 02/12/2014 06:00	Physical Flow	0 kWh/d	•	02/12/2014 10:10
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	30/11/2014 06:00 - 01/12/2014 06:00	Physical Flow	0 kWh/d	•	01/12/2014 09:02
Reckrod	Open Grid Europe GmbH	37Z00000004923T	exit 🗪	30/11/2014 06:00 - 01/12/2014 06:00	Physical Flow	0 kWh/d	•	01/12/2014 09:52
Reckrod	GASCADE Gastransport GmbH	37Z00000004923T	entry ←	29/11/2014 06:00 - 30/11/2014 06:00	Physical Flow	0 kWh/d	•	30/11/2014 09:04
Reckrod	Open Grid Europe GmbH	37Z00000004923T	exit 🗪	29/11/2014 06:00 - 30/11/2014 06:00	Physical Flow	0 kWh/d	•	30/11/2014 10:30

Missing data!



To Gas Day 2014-12-04 INDICATORS NOMINATION

Hourly data Daily data
Current Timezone
CET
From Gas Day
2014-11-02

RENOMINATION
 ALLOCATION
 PHYSICAL FLOW
 GCV
 WOBBE INDEX
 CAPACITY
 INTERRUPTION

ENTSOG Transparency Platform: shortcomings



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- Historical data
 - Not widely available
 - Data should be available from introduction of transparency requirement (March 2011) to facilitate analysis and comparisons
- CMP and Tariffs data
 - Same weaknesses as nomination & flow data
 - PRISMA already provides EU-wide platform
- Balancing data
 - Not available
 - Introduction of BAL NC should prompt publication of linepack and system balance on an hourly basis



Compliance with transparency guidelines:

"...The Forum welcomes the launch of the renewed ENTSOG transparency platform but notes that compliance by TSOs with existing transparency guidelines is not fully achieved. The Forum continues to insist that ENTSOG and TSOs must achieve this compliance under their legal obligations – including the hourly publishing of system imbalance information and including flow data updated in near real time – within the shortest timeframe possible. It remains the primary responsibility of ENTSOG to highlight non-compliance on which basis NRAs, ACER or Commission may take appropriate action."



- Two aspects were examined:
 - publication of near real-time physical gas flows at relevant entry/exit points
 - hourly updates of linepack or system imbalance data
- A few constructive responses received BUT majority of TSOs have:
 - ignored the spirit of the regulation requiring actual physical flows to be updated near real-time, citing concerns over data quality
 - relied on an alternative method of publishing actual and forecast aggregate imbalance information at the beginning of the day, but not updating this hourly within day



REMIT functionality:

"...The Forum invites ENTSOG to assess whether and to what extent the Transparency Platform could be made available and used for the publication of inside information more generally..."



- Data to publish: TSO maintenance, planned or unplanned outages, platform news, UMM (Urgent Market Messages), any other REMIT messages
- Aggregation platforms like the ENTSO-E fundamental data platform (EMFIP) and the ENTSOG Transparency Platform could be the main sources of fundamental data reporting under Article 8(5) of REMIT, without prejudice to the right of market participants to report such data directly to regulators



- Data and processes to feed the ENTSOG Transparency Platform must be clarified and standardized
- Presentation of information must be apt for effective dissemination: current "scrolling" format is not acceptable
- Specific attention is needed for inside information and fundamental data currently reported on network users' own websites
 - how this data is flowing to the ENTSO-E fundamental data platform (EMFIP) and the ENTSOG Transparency Platform
- Implementation must be accompanied by a detailed project plan, allowing all involved parties to prepare (and test) their systems



- Enhancement needed in data quality, availability and timeliness
- Additional information requirements under CAM NC, BAL NC and TAR NC
- TSOs should immediately publish on the Transparency Platform what they
 publish on their own website
- TSOs should support each other in achieving complete and timely publication
- Phased objectives and discussion with NRAs on investment cost is necessary
- Information is essential for the design of a sustainable gas market

Thank you for your attention! EFET



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