

# ACER



Agency for the Cooperation  
of Energy Regulators

## **ACER and the Transparency Platform**

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# The legal basis of transparency obligations

- Annex I of Regulation 715/2009 (Chapter 3), as modified by:
  - Commission Decision of 10 November 2010 (to apply as of 3 March 2011)
  - Commission Decision of 24 August 2012 (to apply as of 1 October 2013)
  - Commission Decision (EU) 2015/715 of 30 April 2015 (to apply as of 20 May 2015)



- Specific information has to be made available by TSOs on the ENTSOG Transparency Platform ('TP'), starting from October 2013.






- ACER uses intensively data coming from the TP for its analyses and publications (Congestion Report in particular, but also MMR)
- WE use two tools:
  - the TP directly
  - An export bulk file from the TP



## How we understand it?

- Data completeness: the data is available;
  - Data plausibility: within a reasonable range;
  - Data correctness: it is accurate (small error range);
  - Data interpretation: might be still needed, in some cases.
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- ENTSOG plays a key role in putting the Agency and TSOs in contact with each-other. These interactions complete the understanding of data, data quality.

## What can you do if data...

- ...is missing  Use other sources (BP, TSO websites), but it takes more time.
- ...is not usable  Solve individually TSO by TSO and NRA by NRA -> takes more time even to ACER to solve it.
- ...is not accurate  Problem might remain unnoticed.
  
- ENTSOG plays a key role in managing data quality issues on the TP.

Item	Importance for the Agency
Inclusion of non-offered capacity products (Congestion Report)	High importance (awaiting)
CAM & CMP filters (based on latest CAM & CMP IP scope lists)	High (filtering improved, tool exists, plausibility not checked)
Pipe-in-pipe filter	High (filtering improved, tool exists, plausibility not checked)
Balancing zone filter	High (tool exists, plausibility not checked)
Methodology of reporting – operation and balancing data included in transport data	High (in progress)
Reasons for change of technical capacity	Medium (no commitment yet), despite the information would improve the quality of data analysis.
Booking Platform used at each IP side	Medium (in the new bulk files)
Unlimited interruptible capacity	Low (both in the bulk and on the live charts) (completed)



## Data beyond Regulation - Stakeholder Requests



Functionality	Feature	User benefit
Periodisation of capacity and interruptions	Display the <b>capacity</b> values per day, or per period when capacity is constant*	Increased <b>data usability</b> for users comparing with daily data
Publication of hourly updates of physical flows in hourly granularity	Increased <b>data granularity and frequency</b> , published voluntarily for <b>daily balancing regimes</b> at all cross border IPs.	Increased data granularity and frequency, published voluntarily for daily balancing regimes at all cross border IPs.
Pipe-in-pipe setup	Display of pipe-in-pipe situations	Clear <b>overview</b> of <b>pipe-in-pipe situations</b> in charts and exports
Booking platforms information	Display of booking platform information and <b>direct links</b>	Faster overview and <b>access to the right booking platforms</b> for CAM-relevant points
CAM and CMP relevance per IP side	Denotation of <b>CAM and CMP relevance</b> per IP side	<b>Awareness</b> of applicable market rules per IP side
TP User Manual	Comprehensive manual describing <b>all</b> TP functionalities	<b>Easy access</b> to explanations of the available sections and features
'Submit a question' form	Question form to send transparency questions to ENTSOG and TSOs	<b>Assistance from</b> ENTSOG and TSOs for functionalities and data interpretation

## Open Requests beyond Regulation



Topic – who	Feature	Potential user benefit	~ cost
Hourly line pack – EFET	Information about hourly line pack on TSOs'/MAMs' websites	Potential benefit to the market in general has not been described by EFET.	+/-40 projects (TSOs)
More frequent physical flows – EFET	Information about physical flows every 5-12 minutes.	Potential benefit to the whole market has not been described by EFET. In general, hourly data are provided today.	48 IT projects (ENTSOG + TSOs)
CMP unavailable firm products – ACER	<b>Which</b> products are affected when firm capacity products with a duration of one month or longer are not available (for Congestion Report).	As this information is already published on the booking platforms, ENTSOG questions the <b>added value</b> of repeating the information on the Transparency Platform considering cost involved.	Major ENTSOG IT project <b>or</b> 47 smaller TSO projects +minor ENTSOG project
Bundled versus unbundled products – ACER	Publication of products' bundling status	As this information is already published on the booking platforms, ENTSOG questions the added value of repeating the information on the Transparency Platform.	Major ENTSOG project <b>or</b> 47 TSO projects + minor ENTSOG project
Allocations – ACER	Publication of allocations for ACER's monitoring activities.	Renominations and Nominations (already available) are good alternatives to using Allocation data; ENTSOG questions the value of publishing allocations.	10 TSO IT projects Some TSOs are publishing on voluntary basis

## **Appearance**

- The TP has an appealing and clear interface
- Several filtering options available also on the map

## **User-friendliness**

- Interactive charts provide useful immediate visual information
- export files require elaboration → ACER, «special user», asks for a customized bulk file

## **Robustness and reliability of the engine**

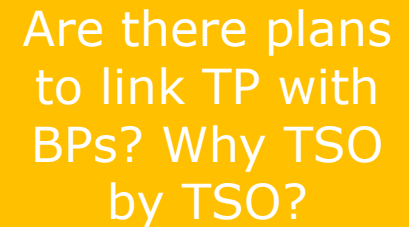
- The engine allowed exporting up to 23,000-row files
- Users' feedback on reliability and performance should be closely and regularly monitored

How is the TP performing during downloads?



## Summary results on CMP exports files

1. Unsuccessful requests:
  - Completeness and readability issue
2. Unavailable firm:
  - Same as above (BPs as secondary source)
3. Auction Results:
  - Need to introduce distinction bundled/unbundled (BP)
4. Capacity made available → errors and additional collections
5. Point information:
  - CAM/CMP relevant filter;
  - its accuracy will be checked at the occasion of the next Congestion Report (in the past it did not return the right number of IP sides).



Are there plans to link TP with BPs? Why TSO by TSO?

The TP has grown over time.  
Initial design may not be in line with the more recent requirements.

## Balancing in the TP

- Relevant information (nomination and renomination) is shown at different levels of disaggregation
  - Hourly frequencies are a challenge
- According with current obligations, linepack and aggregated system imbalance positions per balancing zone are not shown on the TP.
  - These data are published on the TSOs' websites



Legal basis - Annex I: Point 3.4: TSO publication  
But Annex I: Point 3.1.1 defines the general framework and says:

- website available to public (TP)
- which is downloadable,
- allows quantitative analysis (<-> accuracy)
- data availability on a cost-efficient basis

## Overview

Summary statistics	2014			2015		
	CAM.1	CAM.5	CAM.6	CAM.1	CAM.5	CAM.6
TOTAL border sides	128	130	130	135	136	136
Nº of #VALUE!	0	-4	-12	0	0	-14
Nº of #DIV/0!	-5	-50	-44	-10	-50	-46
Value = 0	-8	-5	-11	-12	-5	-8
IPs part of multiple zones in a single MS	-7	-7	-7	-6	-6	-6
Excluded IP borders with no-EU countries	-13	0	0	-12	0	0
USABLE border sides	95	64	56	95	75	62
Percentage of usable border sides	74%	49%	43%	70%	55%	46%

Summary statistics	2016	
	CAM.5	Nominations/Booking
TOTAL IPs	181	170
IPs with errors	-91	-84
USABLE IP sides	90	86
Percentage of usable IP sides	50%	51%

Out of 366 CAM points only 181 points covered the full period with daily data, only 269 points identified by TP as CAM relevant. (2016)

The assessment for 2014/5 is based on border sides, while 2016 is based on IP sides. The results for 2014/15 are not directly comparable with the results reached in 2016. For 2014/15 the third country IP borders were excluded, but that is not a data error issue.

CAM 1 is the aggregated yearly averages of daily technical firm capacities at EU IP sides;

CAM 5 is the ratio of booked over technical capacity;

CAM 6 is the ratio of physical flows / technical capacity

Calculations for 2016 include CAM.5 and a ratio similar but not the same as CAM.6, namely a ratio on nominations/bookings.

## Transport data: export files

- In the last three consecutive years we had problems getting to right number of IP sides (see slide before)
- Building the **CAM IP Scope list** into the TP looks convenient. Updates will be on track and without limitations to multiple and frequent updating. (Reasons for CAM/CMP relevance somehow should be accommodated by TP to simplify the regular review process.)

### CAM and CMP IP lists on the TP

- **Capacity**
  - On charts values are clearly displayed;
  - Misreported data and data harmonisation might be still relevant to impose;
  - Uniform methodology for data collection: flow data for pipe-in-pipe, TSO balancing actions eliminated from shipper data.
- **Nomination, Renomination,**
  - Updates happen soon enough for hourly and daily data?
  - Are both values available?
- **Allocation (not required by the Transparency Annex)**
  - This was requested as back-up value by the Agency due to the data quality problems occurring for nominations & renominations.

## Several exchanges at managerial level to prepare working level discussions....

- Occurred this year both physically and in form of letter exchanges, which described where we perceived the problems.
- Discussions on the working/ experts level are planned to look into these requests more specifically and discuss possible refinements:
  - Data standards and format;
  - Data quality.

Workshop on data quality foreseen for January 2018

## ▪ For the TP:

- Establish indicators and publish data quality results to users
- We are less confronted about performance issues on
  - The capability of the TP export engine,
  - The capability of the API tool and the user-friendliness of the instructions,
    - Although we used the above tools at certain occasions our data request was often rejected,
    - That coincides with the performance request users made in the satisfaction survey.

## ▪ For the bulk export file:

- Full data availability,
- Possibility to pre-screen the data set,
- Readability and plausibility of the data set.

## **Clarification needs, handled as early as possible**

- Smooth and fast communication about the data, using the knowledge accumulated.
- Improvements are expected for:
  - Data filtering,
  - Data explanation/checks.
- An earlier communication of the data would allow pre-screening by ACER (e.g. list, data structure) -> From previous experiences: large datasets never came without errors.

**Thank you for your attention!**



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