



Open letter to CWE regulators regarding the transparency of data provided by TSOs in the framework of flow-based market coupling



31 October 2018

Dear CWE NRAs,

EFET, IFIEC Europe and the Market Parties Platform have carefully read the position paper issued by CWE NRAs in August 2018. We welcome the clear request for transparency on the flow-based parameters, for which NRAs were setting a deadline on 15th of October 2018.

Unfortunately, while we acknowledge that some efforts have been made over the last weeks by TSOs on the publication of pedagogical information¹ on JAO website and on the translation of CBCOs, we regret to see that six out of the seven transparency requirements requested by NRAs have not been implemented or fully implemented in time by TSOs.

Market Parties therefore call CWE NRAs for immediate action to enforce their decision of August 2018.

For each of the seven elements requested by NRAs, we provide feedback below on the achievements of TSOs, or regrettably in most cases, lack thereof.

¹ DC load flow; Nodal PTDF computation; Net position forecast; Qhull algorithm.

1. “CWE NRAs urge for completeness of the published data with unique physical names and EIC-codes of both CBs and COs before 15 October 2018”

Recently, the average rate of CBCO published in a non-anonymous basis has increased. This is a step in the right direction. However, fundamental issues remain, and compliance with the NRA request is far from complete:

- there is still **no translation** at all for the CBCOs located in Austria and at the Austrian-German border, although some of the Austrian lines were translated before the split !
- there is still **no automated process** in place to ensure the publication of CBCOs and their translation as soon as they are issued;
- the quality and accuracy of publications remain insufficient², with the consequence that market parties cannot use historical data.

BorderAlias	CriticalBranchReadabl..	Timeline						
		2017			2018			
		Q2	Q3	Q4	Q1	Q2	Q3	Q4
AT	NoCBReadableName							90
BE	CBReadableName	1,357	1,611	1,535	2,733	1,663	1,619	1,433
	NoCBReadableName	270	414	649	808		68	68
BE-NL	CBReadableName	332	340	340	857	591	616	462
	NoCBReadableName	16	20	409	510		3	
DE	CBReadableName	932	936	930	1,259	1,441	2,915	2,726
	NoCBReadableName	12	25	1,485	1,125		124	429
DE-AT	NoCBReadableName							129
DE-FR	CBReadableName	46	48	46	166	180	220	189
	NoCBReadableName			278	292		2	5
FR	CBReadableName	8	15	16	11	17	19	11
	NoCBReadableName		3	6	6		20	1
FR-BE	CBReadableName	374	385	392	747	413	392	380
	NoCBReadableName	25	42	44	55		2	
NL	CBReadableName	147	147	147	291	387	501	504
	NoCBReadableName		66	974	573		17	
NL-DE	CBReadableName	298	314	306	714	716	674	598
	NoCBReadableName	28	25	1,069	1,097			12

Market participants fail to understand why 18 months after the NRA decision to publish CBCOs in a non-anonymous basis, there is still no structural progress made despite repeated requests by market participants.

For the lines at the DE-AT border, market participants request to have publication of the mapping between previous and current code.

² Inconsistencies, format modifications, no common naming convention, same ID used to designate different lines, etc.

A pragmatic solution to solve the issue would be to abandon the anonymisation process and to request TSO to publish CBCOs directly with the TSO IDs (similar to the table displayed in the “SPAIC” analysis for the DE-AT split). This would solve the problem of CBCO translation and avoid facing the issue of historical data not being useable. Another alternative would be to use the EIC code to ensure a direct link with ENTSO-E transparency website.

In the meantime, market parties request that the data published everyday are stored in a “FTP” server, allowing to keep good track of historical data. This practice was used during the parallel run in 2015 and has unfortunately been abandoned.

2. “The publication of the full RAM-breakdown, i.e. Fmax, Fref, FRM, FAV and the Adjustment for Minimum RAM (AMR) which is currently proposed by CWE TSOs to implement the 20% minRAM”

Full RAM-breakdown is correctly published for all dates later than 29th May 2017. History prior to this date is not included.

3. “The inclusion of the reference program of all CWE and non-CWE borders of the involved bidding zones”

The reference programs are published for all the border of continental Europe. It is not published for borders with Nordic countries and United Kingdom while being directly connected to CWE countries. During discussions with TSOs over the summer, TSOs explained that they do not intend to include them in the daily process.

4. “In the case of derogation from the min 20% rule, publication of the justification”

So far, there is no justification published by TSOs in case of derogation to the 20% min ram rule. There is a notification published on JAO website, but this contains only a short information on the root cause of the suspension, such as “IT issue” or “security assessment”. Moreover, there is no detail on whether the min ram derogation is applied to all lines or to specific lines. We consider this kind of message as non-compliant with the request formulated by NRAs in their position paper³.

We refer to our separate letter on the subject for more details.

³ “CWE TSOs shall timely and duly justify any derogation from the minimum 20% RAM requirement towards NRAs for monitoring and towards market parties for transparency (see Transparency section). “

5. “The publication PTDF and RAM-values before and after LTA-inclusion”

With the recent increase of LTA-inclusion patch activation, this request becomes more and more important. Indeed, when the LTA patch is activated, the clearing point is often situated on a “virtual branch” (i.e. a branch that results from the activation of the patch). Therefore, full transparency is required on how the PTDF have been modified by the patch. The publication of information on the algorithm is not sufficient to help market participants perform probabilistic analysis accounting for the future activation of the patch and adjust hedging strategies or maintenance operations. Without the publication of the PTDFs before the activation of the patch, market participants are not able to associate physical reality (e.g. wind, temperature, nuclear availabilities, line thermal limits) with flow-based parameters, since they only see “virtual” flow-based parameters – the ones created by the patch, thanks to remedial actions usage on which there is no transparency. Understanding how the model behaved before the activation of the patch, how far the LTA-patch drew the flow-based results away from the initial clearing point, and linking all this to the physical conditions in the hours when it was activated is fundamental to assess what level of import/export the market can expect depending on the physical situation. Full transparency on PTDFs and RAM values before and after the LTA-inclusion will enable market participants to improve their operational decisions and hence increase social welfare.

So far, this request has not been achieved, and no feedback from TSOs has been given on when it could be put in place. To our knowledge, the data exists and does not require TSOs to perform analysis.

6. “The timely publication of all outages considered in the market coupling”

We still observe errors or inaccuracies in the publication of outages.

For illustration purpose, we saw that Elia reported an outage on one line from 8th to 19th of October, however no reference to such outage was found on ENTSO-E website.

41-42	08/10/2018	19/10/2018	D&N	VAN EYCK (B) - Maasbracht (NL) black	380	Scheduled works	Elia
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In another example, ENTSO-E reported several concomitant planned outages of parallel lines/circuits on its transparency platform (EMFIP). These concomitant planned outages of parallel lines/circuits are not very plausible and also were not reported by the respective TSOs at the same time. The repeated occurrence of such events highlights that ENTSO-E transmission outage information is unreliable (possibly as IT interfaces to TSOs do not work correctly), while TSO information does not seem to be complete / difficult to access in an automated fashion.

Clear **processes** need to be put in place by TSOs to ensure that the information available through different channels is fully coherent. NRAs should keep these processes in check.

7. “The publication of up-to-date static grid models”

Country	TSO	Update	400 kV	220 kV	150-110 kV	Transformer	PST	Topology	Imax
AT	APG	2015/09	Yes	Yes	N/A	No	No	No	Yes
BE	Elia	2015/09	Yes	Yes	No	Yes	Yes	No	No
DE	50Hz	2018/01	Yes	Yes	No	Yes	No	No	Yes
DE	Amprion	Old	Yes	No	No	Yes	No	No	Yes
DE	Tennet	2018/01	Yes	Yes	No	Yes	No	No	Yes
DE	Transnet	2018/05	Yes	Yes	No	Yes	N/A	No	Yes
FR	RTE	2015/05	Yes	Yes	N/A	Yes	No	No	Yes
NL	Tennet	2018/10	Yes	Yes	No	No	No	No	Yes

Static grid models are for most TSOs out dated. Their publication is not consistent across TSOs in both format and content. Detailed substation topology (Switch/Breaker/Connected Generation) is never published (TSOs refused to document this, stating it was too complicated). Transmission lines below 400kV and Transformers/PST should be published if modelled in the operational grid model (D2CF).

Market participants call on CWE regulators for action

The go-live of CWE flow-based market coupling in May 2015 was contingent on a number of transparency requirements laid down by CWE regulators in a document published in March of that year, to be fulfilled by November 2015. Despite intense exchange between market participants and TSOs, many of these requirements have not been fulfilled to this date, or not satisfactorily.

CWE regulators expressed their frustration with this situation at multiple occasions. However, these statements did not result in the necessary leaps on the TSO side: CWE flow-based transparency remains well below market participant expectations, and is still not compliant with the 2015 Approval Package.

With the review of the Approval Package in the summer of 2018, CWE regulators took the opportunity to renew and update their transparency requirements, along the lines of market participant requests. However, once again, the deadline set by the regulators has passed and TSOs are very far from complying with these requirements.

While we value the recent announcements by ENTSO-E of their strategy on transparency, the experience of market participants in technical forums like CCG is general defiance and constant questioning about our requests, despite the fact that they correspond to obligations set on TSOs by their regulators. We will continue to work with TSOs in such forums, hoping for a more constructive dialogue and significant leaps in TSO efforts on transparency. But we need more than hopes at this stage. Therefore, we believe it is time for stronger action by the regulators. We believe it is time to hold TSOs to the same standard as market participants when it comes to transparency.