

ENTSO-E Annual Work Programme 2019 – Comments received during the public consultation ran from 6 August to 17 September 2019 & Answer by ENTSO-E

Page number / Section	Text	Stakeholders' comments	ENTSO-E's answer
Whole report	n/a	From: ELEXON Comment: The highest priority should be the continuing implementation of European Network Codes and Guidelines, including the publication and consultations on the many methodologies required. These are legal obligations with set deadlines and of key interest to, and impact on, all stakeholders in the European electricity markets.	Indeed, as stated in the executive summary “The role of network codes and guidelines within ENTSO-E’s mandates cannot be underestimated. To flag out the importance and the workload related to the codes this work programme puts them centre stage (Chapter 1).”
Page 13	<i>[EB Guideline] ENTSO-E submitted the monitoring plan for the EBGL to ACER for opinion on 6 June 2018. Next steps include the elaboration with ACER of the list of relevant information to be communicated to ACER.</i>	From: ELEXON Comment: On page 13 of the draft Annual Work Programme, we note that ENTSO-E has submitted the draft EBGL monitoring plan to ACER. Has this been published? Is it possible that non-TSO delegated operators like ELEXON who operate, for example, imbalance settlement, may be asked to provide data to ENTSO-E/ACER under this plan? If so, we would like visibility of what the plan contains.	The proposal is still under finalisation. The monitoring plan is not published, and the detailed parameters are still to be agreed upon. Certainly, the relevant data owners will be involved in time.
Page 17	<i>[NC ER] Moreover, the expert team will also establish widely applicable guidelines for the rules for suspension and restoration of market activities, which in turn</i>	From: ELEXON Comment: On page 16, it is noted that ‘the expert team will also establish widely applicable guidelines for the rules for suspension and restoration of market activities, which in turn are the responsibility of each TSO to be implemented’. It is important that these guidelines are	Agree with the point being made however the guidelines are for the situation in which (system state) the markets should be suspended or restored, rather than for the rules to be applied when the markets are suspended or restored. The point will be clarified in the AWP.

	<p><i>are in the responsibility of each TSO to be implemented.</i></p>	<p>developed in close cooperation with all key stakeholders including industry participants, NEMOs and non-TSO delegated operators like ELEXON, as we all have various responsibilities under the EBGL and national rules when markets are suspended and restored.</p>	
Page 26	<p><i>[Deliver a vision for 2030] ENTSO-E launched two parallel and coordinated projects in 2018, to develop visions for 2030 from the perspectives of market design and of system operations. To address current challenges and meet future needs, different options for market design models - ranging from simple evolutions of the current EU target model to more substantial changes - are being identified and will be evaluated. From a system operations perspective, the project aims to build on existing ENTSOE project work to provide a consensual and proactive TSO vision for operation in 2030, which will better shape future public debate. Both projects are expected to conclude with the publication in end 2019 of a joint market and system operations vision for 2030, including the findings of</i></p>	<p>From: ELEXON Comment: The Vision for 2030 market design models (page 25) should be developed with the involvement of all stakeholders, not TSOs alone as TSOs have only one view of the markets and do not operate in all of them. Involving non-TSO stakeholders from the start will give a more robust set of options more quickly.</p>	<p>The project will develop in 2 phases, in the first phase (during 2018) ENTSO-E is focussing on 2030 challenges from TSOs perspective. To this extent, identifying alternative policy options requires a first general alignment within the TSOs community. In the second phase, during 2019, a dialogue with interested stakeholder organised as soon as the set of options is sufficiently clear. It should be noted that it is current practice of all major European associations (of regulators, generators, suppliers, consumers, distributors, etc.) to first start developing options and proposals internally. ENTSO-E is open to exchange views bilaterally with stakeholders at any stage of the process. Closer stakeholder dialogue on the basis of concrete draft options and proposals is foreseen as soon as these will be sufficiently defined.</p>

	<i>the market qualitative and quantitative analysis, policy recommendations, and a proposed roadmap for implementation.</i>		
Page 13	n/a	<p>From: ELEXON</p> <p>Comment: ENTSO-E needs to involve a wider group of stakeholders in its expert groups when developing its balancing platforms. There are/will be ‘local implementation projects’. For example, ELEXON will undertake the local (GB) settlement of TERRE product activations, and probably in future for GB MARI activations too; and we will undertake the calculation of GB imbalance prices including TERRE activations. So we need to be able to be aware of, and be able to raise issues caused by any proposed changes to the central platform design/interfaces with the developing TSOs as soon as possible. Otherwise it is entirely possible that the central platform and local interfaces, BSPs in each Member State/TSO area will not all be ready to go live at the same time.</p> <p>The second aspect is that the EB GL has been written in such a way that closely-related activities are undertaken in different timescales which may cause difficulties for implementation at local and European level. Again using TERRE as an example, the TERRE design is likely to be approved by national regulators at the end of 2018, but the approval of balancing energy pricing may not happen until mid-2019, just six months before TERRE has to be implemented. Anything that ENTSO-E can do to organise itself and its workstreams so that these closely related activities take place in the same timescales would be helpful, so that we do not have to</p>	<p>Stakeholders are regularly involved and updated via the official Electricity Balancing Stakeholder Group as well as stakeholder involvement undertaken by the implementation projects.</p> <p>The timing of TERRE and national implementation is noted. Amendments of national legislation may become necessary.</p>

		keep tweaking the design of the central TERRE platform or the local implementation projects that will interface with it.	
Page 37	n/a	From: ELEXON Comment: ELEXON thanks ENTSO-E for continuing to support and operate the Transparency User Group, which we have found extremely valuable for discussing possible and proposed changes to the Transparency Platform that may require changes from us in turn. In particular, we appreciate the early discussion of those changes face to face, and we hope that ENTSO-E has found our, and other stakeholders', input valuable too.	Thank you
n/a	n/a	From: ELEXON Comment: The regular updating of the ENTSO-E website in particular to update progress on regional projects, such as TERRE, should be a priority as we near implementation of many of these.	ENTSO-E aims at having all relevant data available on the website.
n/a	n/a	From: ELEXON Comment: The ENTSO-E stakeholder engagement events are always well run and very welcome.	Thank you