

CWE Flowbased Market Coupling – Transparency

Clarification on the issues addressed by EFET in the
MESC meeting of 4th September 2018



Our General Feedback constructive criticism

- In general terms, **Amprion is one of the main supporters of the European Market integration**. We are implementing and executing several Market Integration projects and are building interconnectors to facilitate the ever growing electricity exchange across Europe.
- The **investment in a the new DE-NL tie-line and earliest feasible commissioning** proofs our strong commitment to the European Market integration process.
- Amprion, as one central TSO in the CWE region, **ensures full transparency** meeting the information needs of Market Parties.
- We understand the information exchange with market parties as a process which requires a continuous dialogue. We consider the EFET criticism a constrictive contribution to this discussion and understand traders' requests for early-on information. At the same time, the following points have to be considered, in particular when new tie-lines enter into operation:
 - **Multiple SPAIC-analyses** going beyond legal requirements have become current practice. They **are complex analyses** based on some particular assumptions in a very dynamic environment. Despite early in advance planning delays of the publication therefore cannot be completely excluded.
 - Due to many technical steps/tests close to commissioning the **exact date of commissioning cannot be guaranteed early in advance** (indications were given via the ENTSO-E platform and the Amprion website early in advance)
- Amprion is taking any criticism very serious and is supporting any direct contact (e.g. via CWE forums) with Market Parties and associations to discuss and potentially improve the information exchange processes. We would have considered an information on the EFET criticism ahead of the MESC meeting appropriate in order to prepare constructive answers.

EFET criticism on the lack of transparency of topology changes

EFET criticizes that topology changes have not been communicated at the point in time when they have taken place

- Amprion adapted the CBCO list end of June and in July to tackle changes during the on-going construction work close to the German-Dutch border (internal reconfiguration and relocation of a tie-line)
 - New assets were in place and under construction that required a change
 - No substantial extension of the CBCO list but names had to be adapted to maintain security of supply for the new grid situation
 - No explicit market information was published end of June as the dedicated SPAIC was not finalised as planned and could therefore not be communicated.
- Amprion did not refuse answers in the CCG Call in July since we have unfortunately not been able to attend it.

EFET criticism on the too short lead time between communication of the SPAIC results and the tie-line commissioning

Publication of two SPAICs at the earliest feasible point in time in August 2018 to ensure transparency on the impact of the latest significant changes

- Publication of SPAIC results on 20.08.2018 and substantial extension of CBCO list for the internal reconfiguration and the relocation of a tie-line for business day 25.08.2018

<http://www.jao.eu/news/messageboard/view?parameters=%7B%22NewsId%22%3A%220fd821bd-1b08-416e-9102-a94200f94857%22%7D>

- *Earlier Publication (2 weeks) was initially planned, however not possible because of unexpected short term challenges (introduction of MinRAM), late availability of needed input from third parties within the CWE project and especially final quality checks enhancing complexity and consuming more resources and time than expected.*

EFET criticism on the too short lead time between communication of the SPAIC results and the tie-line commissioning

Publication of two SPAICs the earliest feasible point in time in August 2018 to ensure transparency on the impact of the latest significant changes

- Publication of SPAIC results on 23.08.2018 and further extension of CBCO list for the new tie-lines between Doetinchem and Niederrhein in cooperation with Tennet NL for business day 25.08.2018

<http://www.jao.eu/news/messageboard/view?parameters=%7B%22NewsId%22%3A%22060777f5-fd5c-4227-b583-a94400bce142%22%7D>

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EFET criticism on the lack of clarity of CBCO names / IDs

Update of fixed IDs regarding the new CBCOs of the published SPAICs in September 2018

- Human Readable names without fixed IDs have been published with the SPAIC results
- Fixed IDs can only be updated with human readable names after they have been generated by the CWE tools during the operational process. This is caused by the design of the current CWE process and tools.
- To update the fixed IDs, CWE experts have to manually fill in a translation table afterwards. This is done regularly to ensure up to date data as fast as possible. It also means that it's not possible to provide human readable names before or at the time new CBCOs are created.