

Overlaps between Transparency Regulation (TR) and Electricity Balancing Guideline (EB GL)

Overlapping regulation articles	ETUG Comments	ENTSO-E clarification
<p>Rules on balancing (TR article 17.1.a) and Terms and Conditions (EB GL article 12.3.g)</p>	<p>Article 12.3.g of EB GL refers to Article 18 of EB GL, which is very high context and covers a lot; therefore it is fair to say that it covers more than Article 17.1.a of TR;</p> <p>However, I am still not sure about “Terms and Conditions”, that are mentioned. Are they going to exist in current available version of Article 18 of EB GL, or will be further updated?</p> <p>Does this mean that they have NOT been (fully) drafted yet? It’s quite a vague usage in English as it can mean anything from nothing written to once written.</p>	<p>EB GL article 12.3.g covers TR article 17.1.a. Most TSOs are likely to submit it by end of 2019. Moreover, there has been an initiative internally, to publish them as soon as possible, when they are made available. Please note that available T&Cs varies from one TSO/country to another (Art.4(1) of EBGL).</p>
<p>Accepted aggregated offers (TR article 17.1.d) and Total volume of offered balancing energy bids (EB GL article 12.3.e.ii)</p>	<p>As adjectives the difference between aggregate and total is that aggregate is formed by a collection of particulars into a whole mass or sum; collective; combined; added up; While total is entire; relating to the whole of something.</p> <p>While I agree that there is no meaningful distinction, there can still be a room for interpretation.</p> <p>To my opinion, the ambiguity is clarified by the generalisation.</p> <p>The total is the whole of something, therefore the total will include the accepted aggregated offers volume; However, as I understand it, that this information will be provided within the total (whether it is offered or activated energy); if this suits the needs of whoever will be using this information, then yes, I agree that the new EB GL Art. 12.3.ii removes the ambiguity.</p>	<p>EB GL article 12.3.e(ii) indeed covers 17.1.d.</p>
<p>Maximum and minimum prices of exchanged bids and offers in cross-control area balancing (TR article 17.1.j) and Prices paid by TSO for activated balancing energy (TR article 17.1.f)</p>	<p>I would need a second opinion, to make sure that the current wording of Art. 17.1.f fully covers the meaning of Art. 17.1.j , for the last one to be substituted (Please see further remarks in the Annex with wording of mentioned Articles) Just TSOs? In Article 17.1.j, there is a footnote that Operators of balancing markets shall be considered as primary owners of the information they provide.</p> <p>Is the meaning of the word “prices” here is focused only on the prices (compensation, etc) paid by the TSOs only, or it can mean any money transaction (that may incur including the operators of balancing markets, and therefore the footnote from the Article 17.1.j. would be more complete)?</p> <p>Maybe I am missing the point, please let me know if so.</p>	<p>Assuming that the question refers to the involvement of Third Party Market Operators (e.g. Elexon for UK or eSett for the Nordic countries), it is the TSO who is responsible to report the prices on the platform. Moreover, by default the balancing markets are based on a TSO-TSO model, and in the case of a TSO-BSP model, it will anyway be the TSO who sets the price.</p> <p>Prices for activated balancing energy will be published under article 17.1.f and that such prices will be delivered by the common European platforms as far as standard products are concerned and by TSOs for specific products.</p> <p>Prices currently published under 17.1.j reflect the price of the most expensive bid and the price of the cheapest bid offered in a given scheduling area and for given procurement time unit.</p>
<p>Volumes of exchanged bids and offers in cross-control area balancing (TR article 17.1.j) and Total volume of offered balancing energy bids (EB GL article 12.3.e.ii)</p>	<p>Procurement time unit is not in the definitions of TR; is there any major difference between procurement time unit and balancing time unit? Does the 1st one mean the entirety of actions taken for balancing?</p> <p>Otherwise yes, the wording of TR and EB GL compared articles coincides.</p>	<p>When it comes to current publications on the platform, balancing time unit coincides with the procurement time unit. Moreover, once EB GL enters into force we will publish per ISP, or per MTU depending on balancing data items.</p>