



BY EMAIL

16 September 2011

European Commission  
DG Energy - ENER.DDG1.B.2  
'Electricity transparency'  
Rue De Mot 24-26  
B-1049 Bruxelles  
Belgium

Dear Sir/Madam,

This is ELEXON Limited's response to the European Commission consultation on "Guidelines on Fundamental Electricity Data Transparency".

**What is ELEXON's interest in the proposed Guidelines?**

ELEXON is the Balancing and Settlement Code (BSC) administrator for England, Scotland and Wales. We operate the imbalance settlement arrangements for wholesale electricity in this part of the European Union. We already report some of the data required by the proposed Guidelines (both nationally and to ENTSO-E), and strongly support the idea of additional market transparency, which will benefit both end consumers and new entrants to our market.

Because of our role as a code administrator (independent of market participants) we are not responding on the competition aspects of your consultation, but only on the completeness and clarity of the definitions.

**Question 2: Do you consider that definitions are complete and clear enough to avoid any potential problems when applied?**

The proposed Guidelines envisage that detailed definition will be developed by ENTSO-E:

- Article 2.2 of the proposed Guidelines requires ENTSO-E to develop (in a transparent manner) detailed definitions for each data item, and to consult upon them publicly before their application.
- Article 4.1.4 requires that the detailed definitions should include a description of the load forecast method.

In the absence of these ENTSO-E definitions, it is difficult to assess the magnitude of the Information System (IS) changes that Transmission System Operators, market participants and other third parties will be required to make in order to implement the Guidelines. We therefore suggest that:

- It would be helpful for ENTSO-E to engage with stakeholders on the possible content of these definitions at the earliest opportunity; and

- Until the content of these definitions is known, it will be difficult for the Commission (or stakeholders) to form a view on the length of time required for implementation of the Guidelines (once agreed).

We hope you find these comments helpful. If we can provide any further information I can be contacted on +44-20-7380-4345 or by email [john.lucas@elexon.co.uk](mailto:john.lucas@elexon.co.uk).

Yours faithfully

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