

Status CWE FB transparency as of July 17th

This document is giving a status on transparency around FB capacity calculation in CWE, as seen from market participants. We have estimated the status for the different requests, as sent to TSOs on April 12th 2018 (using the same structure, with a “dashboard style” format). The document has been prepared by a small group of market parties, members of the CWE FB Consultative group.

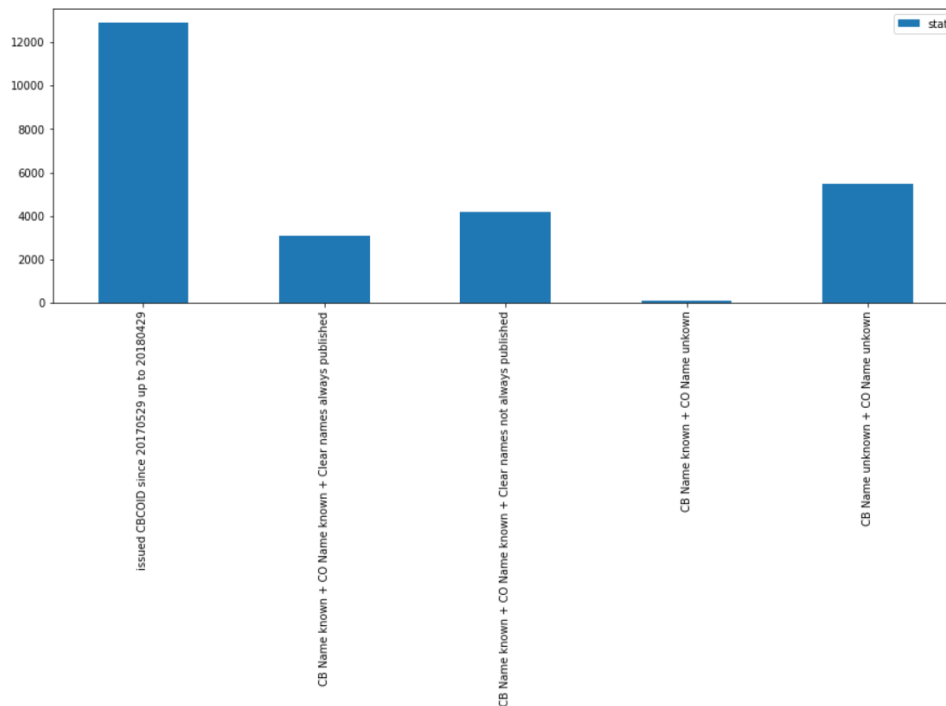
The reporting tables foresee a column for TSO feedback. In general, market participants expect a feedback from TSO on the acceptance of each request. In case if it refused, we would like to understand the reason for refusal. In case it is accepted, we would like to have a commitment on the date of accomplishment.

The TSO feedback column has been filled by market parties following the telco of July 17th.

Market participants would like to have recurrent telcos/meeting with TSOs and NRAs to ensure a proper follow up of the transparency framework.

1. Completeness and accuracy of the currently published data

As of 20180628, bellow is the view on the statistics of translated CBCO



12875 CBCOID published since the beginning of clear CB name publication.

If we group the two first categories in the “known CBCO” category, we got 7302 of them (56% of total).

The rest is more or less unknown (44%).

The statistics depend of when the user has loaded the data in the system. Indeed, if we would reload the whole history from 20170529, we might get a slight increase in the quality of the publication. However, we don't think Market Parties should have to reload every day the whole history of this dataset.

On this point, we think we are still far from the goal of a 100% clear publication

	Status	Priority	Comment market parties	TSO feedback (telco 17 th July)
Complete translation of CB name / CO name	50%	very high	44% of the CBCO still to be translated. We expect an action plan with deadlines.	TSO are investigating a solution.
CB ID and CO ID instead of CBCO ID	0%	low		Not possible, the anonymous process gives one id per CBCO
Harmonized CB/CO naming rules	0%	low		TSO investigating
Provide an up to date translation table in the utility tool as well as history of the transaction tables + foresee a process for systematic and recurrent update	0%	very high	We expect a more robust process, with sanity checks. We would like a field in the translation table with the date as from which it is valid. An alternative could be to avoid working with IDs but to work directly with TSOs naming conventions. MP ask to be associated to the discussions around coding (a workshop with market parties could be done for instance, similar to the SPAIC working group).	TSO need to compile it manually. TSO will start sharing some data. Draft translation table by end of Q318. TSO also investigating how to work without anonymisation.
Sanity check to prevent bad quality data	0%	very high		
Backfill clear CBCO names prior to 20170529 (history)	0%	high		not possible (a lot of manual efforts)
Publication of internal/cross-border transmission outage	50%	very high	Some is done on ENTSOE / Some on internal TSO website / Many are not published at all. MP want a clear planning.	TSO will publish relevant outages on the ENTSO-E transparency platform

Regarding the publication of outages: E-E platform might not be sufficient for knowing what was the outages considered during the FB computation. EE platform is not a D-2 point of view. We have to know what are the outages considered during the FB process. This can only be done within CWE utility tool.

We consider that outages on all lines for which a CB appears should for sure be published (minimum requirement). There could also be surrounding lines that are not CBs but relevant in terms of outages

since affecting CBs. Therefore, we think that the easiest way is to say that all the outages on all assets have to be published.

We have 2 illustrative examples to share:

- Hanekenfaehr - Roxel ROXEL O – according to us, it was out from end June to early July and we cannot find a related publication.
- A more interesting (and price relevant) recent example is not per se an unpublished line taken out, but an unpublished line put in. There has been an important increase of the number of internal German CBCOs on 22/06 and 29/06. In particular, we observe that since then, the new CBCO with ID CB 15555730000 has been one of the most active one. However, according to us it untranslated and on top of that, we think that there has been no specific “qualitative” disclosure of a new line or transformer.

This latter example (CB 15555730000) is a typical example of lack of transparency and shows quite clearly that we are far from target in terms of Flow Based transparency :

- No pre information on JAO regarding the introduction of new CB or the hypothetical structural change in the network;
- Still untranslated 10-15 days after its introduction;
- CBs limiting the market for 2-3 days among those 10-15 days and we don’t have a clue what those CBs stand for;

2. Scope covered by the recurrent publications:

In April 2018, market parties explained in detail what was missing in terms of elements published, in order to get a correct and complete view on the capacity calculation process. The table below gives a status update of these requests.

	Status	Priority	Comment market	TSO feedback
Publication of Remedial Action list	0%	medium		TSO will not provide information. Too much manual effort. Not robust enough.
Publication of used Remedial Action	0%	high	MP ask information on why TSO consider this as not to be disclosed. MP open to stepwise approach. PST might be the easiest way fwd. This is part of the “opacity” and creates additional risks for the market, hence creating market premium. Need to continue the discussion on that.	TSO will not provide information. Too much manual effort. Not robust enough. TSO consider this as sensitive information.
Publication of basecase Flow for all CB	0%	low		TSO will not provide more information.
Update of Static Grid Model	30%	high	Last update : RTE 2015/5/18 ; Elia 2015/09 ; Tennet NL 2017/2/27 ; Tennet DE 2018/05 ; Amprion 2015 / 09 ? ; Transnet BW 2018/05/18 ; 50hertz 2016/12/13 ; No harmonized publication yet NB : this was part of the NRA position paper in 2015	
Transparency on Best Forecast NP methodology	0%	low	When can TSO start to publish ?	TSO will share material before end of Q318 on Net Position model. NRA agree with MP request (email May 18 th).
Update of RefProg (inclusion of HVDC border)	0%	low	When can TSO start to publish ? Why some borders are not described (UK and Nordics) ?	TSO will not provide more information. NRA agree with MP request (email May 18 th). TSO take note of the question.
AMR publication	0%	high	Not mentioned in April 18 document but part of the updated CWE approval package.	Should be published in October 18, but TSO are still assessing the feasibility on IT side.
Unique way to identify each way of the table	0%	medium	Not mentioned in April 18 – quick win proposed below	

Improve the efficiency of aggregated D2CF data	0%	low	<p>Not mentioned in April 18 – not the most urgent request, but pragmatic proposal to improve D2CF, following elements could be published:</p> <ul style="list-style-type: none"> • estimation of the decentralized generation embeded in the vertical load (Ideally with the fuel type break down) • break down of the Generation by fuel type, as we know that some fuels play a big role in the FB domain 	
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Regarding the static grid model, market parties propose a pragmatic alternative way to improve the quality and the process:

- Market parties understand that TSO don't want to publish the used D2CF as it contains sensitive information regarding supply and demand. However, all the transmission data (Topology / Line impedances and FMAX / Transformers parameters) are already published in an un-harmonized and out-dated way (cf table here above). Those data are also inside the TSO D2CF in an harmonized and updated way.
- TSO could then just have to extract once and publish the transmission part of the D2CF in order to achieve the need to have static grid model published.
- A daily extract of the transmission part of the D2CF would be a plus as market parties would know the live switching topology and all the considered transmission outages. It would then also tackle the topic "what transmission outage are considered in the FB" (first line of above table) and the topic "What special substation schemes TSOs have implemented" (publication of used remedial actions).
- In fact, by publishing the transmission part of the D2CF, using TSO convention naming (and not anonymous ID), 3 elements would be solved:
 - static grid model
 - outages considered
 - clear names
- During the telco of July 17th, TSO welcomed the proposed pragmatic approach and said they would analyze it. Market parties expect feedback on it in Q318.

Regarding the publication of the AMR . This is foreseen in the document but not implemented yet while the AMR is applied since May 2018. When will this measure be implemented ? Our understanding is that today, the AMR is included in the FAV. We would like to have publication of the AMR only, separated from the FAV, as TSO committed to do. On the reporting from the parallel run, the AMR is reported in a separated column.

Regarding the base case, we also proposed (quick win), as an interim step to increase the level of transparency. We suggested to identify in a unique (not necessarily explicit) way each row of the file. Even with perfect reliability of the publication process, the name of CB and CO and the “direction” do not identify uniquely a row (the element that is missing is which RA was applied). Therefore, without knowing which RA specifically was applied, knowing which row “go together” in a consistent manner across time would palliate the absence of publishing the base case. Of course, market parties still consider that transparency on RA should be granted, but as a very easy quick win, this would already improve the situation.

Regarding the current publication of aggregated D2CF:

- The vertical load doesn’t mean anything as long as we don’t know up to which voltage level each individual TSO stop describing the network and how many decentralized generation is embed in it.
- The Generation : aggregated overall generation number is also useless as part of the generation could be embed in the vertical load. So we don’t know what this figure represent. Could TSOs clarify this point ?
- Net Exchange : our understanding is that it is just the difference of the two previous points (for which we lack information)

We propose the following to improve this publication :

- TSO should provide an estimation of the decentralized generation embedded in the vertical load (Ideally with the fuel type break down)
- TSO should provide a break down of the Generation by fuel type, as we know that some fuels play a big role in the FB domain

3. More transparency on the LTA patch

	Status	Priority	Comment market	TSO feedback
Pseudo-code of LTA Patch	0%	medium		Share material (via e-mail) before the end Q32018 about Qhull algorithm (including explantion how LTA patch works)
Qhull options	0%	medium		Share material (via e-mail) before the end Q32018 about Qhull algorithm (including explantion how LTA patch works)

Publication of CBCO Parameters before LTA Patch	0%	very high	MP indicate high priority.	TSO do not have feedback. They still have to investigate. TSO mention it is an IT issue. .
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Given the high number of activation of LTA patch, it is crucial to publish CBCO parameters before the activation of the patch.

NB: The LTA patch is activated after the min RAM is applied (in case of violation of the LT domain), as explained and presented in the CWE FB Consultative group of April 10th 2018.

4. Increase the general description of algorithm and methodology of key parameters

	Status	Priority	Comment market	TSO feedback
DC Load flow parameter description	0%	low	How the parameters should be set to make a DC load flow.	TSO will not provide additional information. TSO thought market parties were requesting daily publication. They will check and come back.
GSK Detailed regional break down	0%	low	Which power plants are taken into account and how are they weighted ? Sharing keys should also be published (only examples are published). Also important that any change of GSK methodology is published on JAO.	TSO refer to the approval package. TSO ask more information about the need.
PTDF computation methodology disclosure	0%	low		Methodical process of PTDF publication will be published by the end of Q318

5. Timing and process of the publication

	Status	Priority	Comment market	TSO feedback
Aggregated D2CF Data publication in D-1	0%	high	This is very important for market participants, we do not understand why we should wait. The data is available so it could be published directly.	