

– Consultation response –

Europex response to ENTSO-E’s public consultation on Key Organisational Requirements, Roles and Responsibilities (KORRR)

Brussels, 1 December 2017 | Europex has submitted its response to ENTSO-E’s public consultation on the All TSOs’ proposal for the Key Organisational Requirements, Roles and Responsibilities (KORRR) relating to Data Exchange in accordance with Article 40(6) of the Commission Regulation (EU) 2017/1485 of 02 August 2017 establishing a Guideline on Transmission System Operation (SO GL).

Europex suggests deleting Article 19 of the present proposal. We understand the approach to mention all involved parties in the data exchange process. However, the obligation for NEMOs to share market results and cooperate with TSOs is already stipulated in other EU legislation, including Commission Regulation 2015/1222 (CACM, mainly Article 62) and Commission Regulation 543/2013 on the submission and publication of data in electricity markets. Furthermore, the SO GL itself does not mention any NEMO roles or responsibilities, and KORRR is only an implementing and not a legislative document. The enforceability of Article 19 would not be given as it is not in line with the SO GL.

For reference, the Article 19 of the KORRR proposal, titled “Responsibilities of NEMOs” is as follows:

1. Each NEMO shall agree with its respective TSO or TSOs the process to exchange information regarding mark etc. operated by the NEMO.
2. Each NEMO shall provide to its TSO or TSOs the results from markets operated by them according to the agreement on previous article.
3. Each NEMO shall be responsible for the installation, configuration and maintenance of the communication systems to exchange scheduled data with the TSO unless explicitly otherwise agreed with its TSO.
4. Each NEMO shall make available the market results to the relevant parties.

About

Europex is a not-for-profit association of European energy exchanges with currently 27 members. It represents the interests of exchange-based wholesale electricity, gas and environmental markets, focuses on developments of the European regulatory framework for wholesale energy trading and provides a discussion platform at European level.

Contact

Europex – Association of European Energy Exchanges

Address: Rue Archimède 44, 1000 Brussels, Belgium

Phone: +32 2 512 34 10

Website: www.europex.org

Email: secretariat@europex.org

Twitter: Europex_energy