

ENTSO-E Annual Work Programme 2024 - Treatment of stakeholders' comments

This note contains a summary of remarks received during the public consultation organised from 5 July to 16 August 2023 and ENTSO-E views on those comments in relation to the Annual Work Programme (AWP) 2024. For ACER's information, ENTSO-E organised a public Webinar on 12th July in the middle of Public Consultation.

Stakeholder	1. Do you think the Work Programme focuses on the right deliverables or should some be deleted or added	2. On the individual work items do you have any specific comments?	3. What items from the AWP should be prioritized in the case of future unexpected circumstances causing disruptions/unintended consequences?	ENTSO-E views
Infos- Réseaux	According to the past year experience around the transparency platform, it should be included in research and development program and connected to many interoperability projects conduced there. We are currently lacking standards for 2013/543 regulation and more globally about open data. Thus, deliverables covering TP in market section should be moved to RDI section. Their roadmap should be reworked to include more standard and consistency control regarding data provided by TSOs. A deliverable dedicated to consistency control and advanced TP backend functions should be added. Most system operation and system development deliverables should be reworked as to make their content open and to focus TSOs on producing way more open data than today (great work ahead).	Despite different regulations in the EU regulatory framework, Transparency should be a transverse practice for any activity conducted under ENTSO-E leadership. It's not only about 2013/543 regulation. There should be no difference about standard implementation between internal data exchanges and open data published by ENTSO-E, TSOs and their partners. In you AWP, Transparency should be more deeply linked to your research and development program. Open data isn't only about data visualization dedicated to public. It should be a robust framework allowing to make the right task once at the appropriate extent, instead of defining many different things for the same information always in different fashions at different times for different people (which doesn't bring greater safety at all). Particularly about the Transparency Platform, I studied and reported several data problems occurring in France and Switzerland along 2022 and 2023. See requests #9382141, #9370740 and #9380950. Some has been solved and other still wait for a solution, most of them took more than 6 months to be solved (by data providers). The fact those problems could be acceptable for public information.	TSOs data quality should be our first and only problem for coming years. We need reliability, consistency, and open data to tackle increasing complexity in power system operations. #9382141 request shown that some data providers could make errors in declaring their installed capacities under 543/2013 A 14.1. Additional investigations at local level indicate that source data in TSO own inventory is wrong as well. No one had noticed until a TP end user reported it (the more open data you provide, the more accurate reports you will get). What if those errors spread into internal data exchanges for capacity allocation or mFRR? I'm not aware of a system operation doctrine that can rely on bogus inventory knowledge anywhere in the world. If you don't do it, someone else will. https://www.openstreetmap.org/user/I nfosReseaux/diary/392777	The organizational and operational structure of ENTSO-E is a matter determined internally by ENTSO-E's management. Irrespective of the specific department responsible for handling the Transparency Platform (TP) function within ENTSO-E, it does not impact the core operational processes. ENTSO-E consistently adheres to regulatory requirements in collaboration with its members. ENTSO-E is of the opinion that data reliability, consistency, open access, interoperability, standardisation and relevant protocols will reduce the increasing complexity of the future power system operations especially when considering system integration too – issues that are mentioned in the ENTSO-E's Research and Development Roadmap. When it comes to the implementation of specific tools such as Transparency Platform, there are several aspects/requirements to consider also with relation to market and digital aspects. Within ENTSO-E we enable all the necessary expertise to ensure developing a final product that satisfies immediate but also longer term / strategic needs. Even though TP data quality has improved over the years, we still face some challenges. ENTSO-E is committed to improving data monitoring and quality control of the input data with higher intensity in the next months. The new back end and visualization system will roll out step by step in the next months which will be a primary step towards better system performance, and we plan to introduce quality next year as part of the TP Vision 2030 measures.



Nuclear	Integrate process characteristics and	System int	tegration and	l technology	Back-up facilities	System integration and sector coupling are indeed a key area for ENTSO-E
Business &	thermodynamics for (major) end users of	readiness.				and TSOs that impacts both - planning, operations, but also potential for
Technologies	feedstock, electricity, and heat.					market services. ENTSO-E has been working within several studies (TYNDP
						and Innovation reports) on electromobility and power to heat to investigate
						scenarios, the flexibility potential and the overall impact on the system. That
						has also been reflected in the ENTSO-E Vision for Carbon Neutral Europe.
						In addition, there is a lot of research taking place at EU level that enables the development of solutions to efficiently capture the untapped (yet) potential and reduce any risks. On the technologies perspective, ENTSO-E maintains a library – called <u>Technopedia</u> – which will be subject to updates in the coming period.