



GEODE POSITION ON ERGEG GUIDELINES FOR GOOD PRACTICE ON INFORMATION MANAGEMENT AND TRANSPARENCY ON ELECTRICITY MARKETS

GEODE agrees with the requirements on Information management and Transparency in Electricity Markets proposed by **ERGEG** in relation to System Load, Transmission and Access to Interconnections, Generation, Balancing and Information from the Wholesale Markets.

GEODE believes that these proposed guidelines, intended to set out a minimum level of transparency across European markets, will benefit transactions at national-level, and will contribute to foster a European Single Market (ESM), as European regulations will be further harmonised.

However, it should be carefully taken into account aspects like the additional administrative burden and financial costs that transparency issues would represent to **TSO's** and **DSO's** which should be included in transmission and distribution tariffs. We also consider that it must be clearly defined the management of confidentiality data.

On the other hand, **GEODE** considers that it should not be forgotten that the **key point** to create an **European Single Market (ESM)** -which is, undoubtedly, the final goal of EU regulations-, is not only to provide market participants with more information, **but to make possible the operation of the European Transmission System via strong coordination within independent TSO's**. From **GEODE's** point of view, ensuring every transactions at a EU-level is the only way to break the current situation of dominance in national markets.

For that reason, **GEODE**, although seeing the proposed measures as positive, asks regulators to focus a major effort on the creation of a coordinated body of independent **TSO's**.

These coordinated **TSO's** must ensure the fulfilment of any transactions at a EU-level. If there is any restriction concerning capacities, it must be solved by **TSO's** in a coordinated manner, applying re-dispatching mechanisms when necessary. The costs of re-dispatching mechanisms should be transferred to transmission tariffs and paid by all European consumers because all of them will get the benefits of an integrated **ESM**.

To sum up, we support the obligations concerning information on capacities as the best way to push **TSO's** to the final step: **to guarantee any energy transaction at a EU-level**.

Barcelona 12th May 2006

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