

CONSULTATION RESPONSE



ENSTO-E consultation on Core data quality

Brussels, 30 August 2024 - Energy Traders Europe welcomes the opportunity to provide comments regarding the Core CCR data quality survey.

Data published on JAO

8. How often do you use the following tools and pages?

Scale: 1 = never; 2 = less than once a year; 3 = more than once a year; 4 = monthly; 5 = weekly

	1	2	3	4	5
Publication Tool Handbook					x
Monitoring Tool					x
Core Market View					x
Core Market Graphs					x
Core Map					x
Border Data View					x
Max Net Positions					x
Max Echanges (MaxBex)					x
Initial Comp (VirginDomain)					x

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Remedial Actions Preventive					x
Remedial Actions Curative					x
Validation Reductions					x
Pre-Final (EarlyPub)					x
LTN					x
Final Computation					x
LTA					x
Final Bilateral Exchange Restrictions					x
Allocation Constraints					x
D2CF					x
Refprog					x
Reference Net Position					x
ATCs on CORE external borders				x	
ShadowAuction ATC					x

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ShadowPrices					x
Congestion Income				x	
Scheduled Exchanges					x
Net Position					x
Intraday ATC					x
Intraday NTC					x
Price Spread					x
Spanning/DFP					x

9. How would you rate the clarity and completeness of the information included of the following tools and pages, with 1 being not clear at all and 5 being very clear?

	1	2	3	4	5
Publication Tool Handbook			x		
Monitoring Tool			x		
Core Market View				x	
Core Market Graphs			x		
Core Map					x
Border Data View			x		

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Max Net Positions				x	
Max Echanges (MaxBex)					x
Initial Comp (VirginDomain)			x		
Remedial Actions Preventive			x		
Remedial Actions Curative				x	
Validation Reductions			x		
Pre-Final (EarlyPub)				x	
LTN					x
Final Computation				x	
LTA					x
Final Bilateral Exchange Restrictions			x		
Allocation Constraints					x
D2CF				x	
Refprog				x	

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Reference Net Position					X
ATCs on CORE external borders					X
ShadowAuction ATC					X
ShadowPrices					X
Congestion Income			X		
Scheduled Exchanges					X
Net Position					X
Intraday ATC					X
Intraday NTC					X
Price Spread					X
Spanning/DFP					X

10. Your feedback on the tools and pages

Any feedback on highlighting good practices or examples?

The more recent releases of the [publication handbook](#) have taken into account some of our past remarks. Market parties, as primary users of the tool, are thankful JAO took their feedback into consideration.

[The Monitoring tool](#) serves as a useful means to efficiently monitor the available data.

The clarity is ok, but on some business days the output were wrong and mislead market participants. We need to be able to rely on this published data.

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Core market graphs: the option to zoom (located in the top right corner) and select zones of interest is a useful feature.

Pre-Final (EarlyPub): timeline of publication should be respected as it is not always the case. Also there is a strong need for communication when the process is late (current communication missing).

Final computation: timeline of publication should be respected as it is not always the case. Also there is a strong need for communication when the process is late (current communication missing).

Any comments or suggestions for improvement?

Monitoring tool: It appears that there are still some issues with the monitoring tool, such as cases where the status remains "Expected" even though the data is already present, or where the status shows "Received" but part of data is missing .

Proposed improvements:

- Report (as in the handbook) the expected time of publication for each item.
- Moreover, adding more information in the "Follow up action initiated" column would be helpful to understand the actions taken on the reported issues. For instance, including details about the type of issue (simple delay, IT failure,...) and whether there is active work ongoing to solve the issue. These improvements would enhance the usability of the monitoring tool and help users to effectively track the status of the items.

Core market view: it would be useful to give a short description of what the "tests" do directly on the page (currently users must refer to the handbook)

Core market graphs: An interactive graph would be a valuable addition to the current display format. Users could benefit from features such as the ability (directly from the graph) to select or deselect borders, zoom in and out, and dynamically view values by hovering the mouse over the lines. Being able to directly save the charts would also be welcomed.

Max net positions: the explanation of how Max Net Positions are obtained could be improved, particularly in terms of providing a high-level overview of the calculation.

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MaxBex: The explanation of how these are obtained could be improved, particularly in terms of providing a high-level overview of the calculation.

Initial Comp.(VirginDomain): we understand that the Initial Comp. is based on the F_ref_init and that F-ref does not exist at this point because it is a product of the NRAO phase performed later in the process. However, a column F-ref is shown in the publication tool (values=f_ref_init) but this is not reported in the handbook under section 5.7. Would be useful to clarify this aspect.

Remedial Actions Preventive: replace the term "Parameters" in the right-hand side section by a term that reflects more adequately what the numerical values "baseline" & "after NRAO" refer to.

Remedial Actions Curative: as of today, it seems only the CNEC & cRA#1 names are given, both baseline & NRAO columns remain empty. Difficult to find any useability of this page with the limited amount of information available.

Validation Reductions: TSOs seem not to use all the fields in a standardized way, sometimes the information is all contained in the justification column, sometimes in the extra NP columns . The handbook is also not up to date and does not include a description of all the columns of this page.

Pre-Final (EarlyPub): the calculation of minRAM_target_Core% is difficult to comprehend, and the values displayed still haven't been fixed. A clearer explanation is needed, particularly regarding the relationship between R_amr and minRAM_target_Core. Furthermore, the labeling "R_amr" and "minRAM for Core target" is confusing, and a better naming structure would be preferable.

LTN: the explanation of LTN could be clearer. It is our understanding that LTN refers to long-term capacity that has been physically nominated, and this is currently only applicable to HR-SI: it may be useful to detail further the fact that only borders with PTRs are shown.

Final computation: we propose two modifications to the PTDF Final Computation:

- Add a new column indicating if the CNEC (Critical Network Element Constraint) meets the max2z threshold of 5% (boolean or checkmark). This provides better transparency to MPs and NRAs and helps understand which CNECs has been retained despite not meeting the threshold.
- Introduce another column to classify whether the element is a CNEC (Critical Network Element Constraint) and MNEC (Monitored Network Element Constraint) elements. This will facilitate the filtering by MPs.

LTA: it could be very useful to add a graph view.

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Final Bilateral Exchange Restrictions: as indicated in the publication handbook, if the DA CC fails, the default FB parameters are utilized. In such a case, the description suggests the values may not always correspond to the standard LTN-adjusted LTAs of normal operation days. It would be advantageous to include a message stating whether DFP is in force directly on this page, and add a description of modifications applied on the standard domain. It would be very important to add a "curtailment" section.

ATCs on CORE external borders: it could be very useful to add a graph view.

Shadow prices: we would welcome adding in the handbook a description of the precise formula used to compute the maxZ2Zptdf displayed on this page (since the official CCM formula has been amended a few times it is not always clear to use whether the actual formula behind this column has also evolved over time).

Scheduled exchanges: it could be very useful to add a graph view.

Net position: it could be very useful to add a graph view.

Intraday NTC: on some days, the Intraday NTC was not published, which then implied the need for market participants to perform manual calculation from Intraday ATC and Scheduled exchanges. . It could be very useful to add a graph view.

Price spread: it could be very useful to add a graph view.

Spanning/DFP: It would be helpful to include additional information in the publication handbook about what the Default FB Parameters actually entail (or a link to the associated documentation). In addition, when DFP is applied, the "synthetic" PTDFs based on 0MW max import/export are not reported for all computations (initial/pre-final/final). One such example is on BD

2024-06-25. All 3 publications are described as DFP, but the Pre-Final does not contain the data (it is empty).

Two items, namely Active FB Constraints and Active LTA Constraints are referenced in the Handbook but are not (yet?) published on the API.

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Ease-of-use of data retrieval

11. How often do you use the following functionalities from the JAO Publication Tool on a scale from 1 to 5?

	1	2	3	4	5
Navigation and downloading data					x
Monitoring Tool					x

12. How would you rate the ease-of-use of the following functionalities from the JAO Publication Tool on a scale from 1 to 5, with 1 being not clear at all and 5 being very clear?

	1	2	3	4	5
Navigation and downloading data			x		
Monitoring Tool					x

13. Your Feedback

Any feedback on highlighting good practices or examples for the navigation, downloading of data or the API?

The addition of filters for in-page navigation & data download is also appreciated.

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The option to test the API queries directly on the webpage is a very useful feature.

We would like to add:

1. A notification about any change in the API in advance. E.g. the threshold on the #of API calls per second was implemented without prior information.
2. The API guide could be kept up to date with such information that could impact data extraction or causes any changes in the way data is delivered. E.g. the threshold on #of calls
3. The response from API could contain PublishTime value to help the users know at what time the data got updated/published on the API

Any comments or suggestions for improvement of the navigation, downloading of data or the API?

A point of attention also raised to Core TSOs relate to the go-live of the IDA and of the new "CoreID CCR" page. On go-live day, users found out that the overall structure, naming and url of the published items had been changed compared to the parallel run endpoint previously communicated. This forced users to apply last-minute fixes to correctly retrieve the data. In the future, we hope such changes are performed ahead of go-live and that a warning is sent.

We believe that it would be beneficial to emphasize the "CWE-timezone" even further, despite it already being displayed above the hour selection bar on the left. This is particularly important given that the API operates on UTC.

Additionally, a dedicated tab or link towards the relevant parameters/datasets published on the main JAO website (Ramr DA & ID, SGM ...) which are not currently easily accessible, would be beneficial for users.

Currently, accessing the API tester at <https://publicationtool.jao.eu/core/api> requires either manually changing the url or using the link in the publication handbook, which can be inconvenient. It would be helpful to have an additional tab labeled "API" in the publication tool for easy access to these examples.

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Regular publications or reports

14. How often do you use the following publications a scale from 1 to 5?

	1	2	3	4	5
Static Grid Model					x
Operational KPI reports					
Monthly DQI reports					
Quarterly reports					
Annual reports					

15. How would you rate the clarity and completeness of the information included in the publication, with 1 being not clear at all and 5 being very clear?

	1	2	3	4	5
Static Grid Model	x				
Operational KPI reports			x		
Monthly DQI reports			x		
Quarterly reports			x		
Annual reports			x		

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16. Your Feedback

Any feedback on highlighting good practices or examples for any of the publications?

Static Grid Model: the addition of the changelog has been very welcomed by market participants.

Any comments or suggestions for improvement for any of the publications?

Static Grid Model: not solely related to this page, but ensuring consistency in element names across publications (SGM, CNE names, KPI reports, intermediate ID domains, etc...) is key to provide optimal traceability.

Operational KPIs reports: the page does not seem of use anymore (last ppt from 11/2022), KPIs are rather reported monthly in the DQI reports below. Could be useful to highlight if MPs should follow this page at all.

Monthly and Quarterly DQI reports: it would be preferable if the attachments section were located at the top of the page rather than requiring the user to scroll down.

Closing

17. What general feedback or suggestions do you have for improving the data published on JAO webpages?

Market participants would like to thank JAO & the TSOs for the recent improvements to the publication tool and its handbook, as well as for giving users the opportunity to provide their feedback.

Going forward, we would welcome the addition of new tabs/links on the webpage to connect with external documents or pages (SGM, API tester, intraday files, etc) which facilitates the access. For the PTDF, it would also bring clarity to highlight which elements are true CNECs and which are not, and whether the 5% threshold is reached.

We also proposed above some minor improvements of the handbook.

It is important that all data are published on time and respect public deadlines. Also, before published, all data should be complete.

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18. What general feedback or suggestions do you have for improving the format of this survey?

None

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