

ELEXON'S RESPONSE TO THE ENTSO-E 'STAKEHOLDER SATISFACTION SURVEY 2017'

1. Introduction

- 1.1 This is a copy of ELEXON's response to the ENTSO-E 'Stakeholder Satisfaction Survey 2017', which ran between 11 and 31 January 2018.
- 1.2 The formatting of this response is unusual as it was an internet-based survey and this is a copy of the returned pdf response, but with the Questions asking for personal information and Questions we did not answer removed from this copy.

Steve Wilkin, 30 January 2018

2. Our response to the ENTSO-E Stakeholder Satisfaction Survey 2017

Q5 How closely do you follow ENTSO-E activities?

Often

Q6 In your role, how often were you in touch with ENTSO-E in 2017?

Often

Q7 Please rate your interaction with ENTSO-E using the following descriptions:

Please rate your interaction with ENTSO-E using the following descriptions: - Technically competent:

Agree

Please rate your interaction with ENTSO-E using the following descriptions: - Easily available and open:

Neutral

Please rate your interaction with ENTSO-E using the following descriptions: - Genuine:

No opinion

Please rate your interaction with ENTSO-E using the following descriptions: - Neutral:

Neutral

Please rate your interaction with ENTSO-E using the following descriptions: - Transparent:

Disagree

Please rate your interaction with ENTSO-E using the following descriptions: - Efficient:

Neutral

Please rate your interaction with ENTSO-E using the following descriptions: - Committed to the overall European agenda:

Agree

Please rate your interaction with ENTSO-E using the following descriptions: - Committed to a market-based approach:

Agree

Please rate your interaction with ENTSO-E using the following descriptions: - Committed to sustainability:

No opinion

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Please rate your interaction with ENTSO-E using the following descriptions: - Innovative:

Neutral

Q8 Please indicate your satisfaction with the main ENTSO-E work products in 2017:

Please indicate your satisfaction with the main ENTSO-E work products in 2017: - Internal energy market design & implementation:

Rather satisfied

Please indicate your satisfaction with the main ENTSO-E work products in 2017: - Network code development:

Satisfied

Please indicate your satisfaction with the main ENTSO-E work products in 2017: - Ten-Year Network Development Plan (TYNDP) 2018:

No opinion

Please indicate your satisfaction with the main ENTSO-E work products in 2017: - Research, development and innovation activities:

No opinion

Please indicate your satisfaction with the main ENTSO-E work products in 2017: - Adequacy Reports (Mid-term adequacy forecasts, Winter and Summer Outlooks):

No opinion

Please indicate your satisfaction with the main ENTSO-E work products in 2017: - Data provision tools and projects (Transparency Platform, Common Grid Model, etc.):

Satisfied

Please indicate your satisfaction with the main ENTSO-E work products in 2017: - Network Code implementation (NC Stakeholder Committees):

Satisfied

Please indicate your satisfaction with the main ENTSO-E work products in 2017: - ENTSO-E stakeholder workshops:

Very satisfied

Please indicate your satisfaction with the main ENTSO-E work products in 2017: - ENTSO-E stakeholder consultations:

Very satisfied

Please indicate your satisfaction with the main ENTSO-E work products in 2017: - ENTSO-E Policy papers:

No opinion

Please indicate your satisfaction with the main ENTSO-E work products in 2017: - Other (please specify below):

No opinion

Other comments on the main ENTSO-E work products in 2017:

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ELEXON is the non-TSO third party market operator responsible for managing imbalance settlement in Great Britain (GB); the settlement of GB balancing mechanism products; and the GB electricity transparency and REMIT inside information platform. We therefore take a close interest in ENTSO-E proposals developed in compliance with the Electricity Balancing Guideline, such as harmonised imbalance settlement, etc.

We also supply data to the ENTSO-E transparency platform on behalf of many GB stakeholders and market participants, so we need to know about planned changes to that platform well in advance, particularly where they might impact our own GB arrangements.

Q9 Please indicate your satisfaction with ENTSO-E stakeholder engagement on mandated deliverables in 2017:

Please indicate your satisfaction with ENTSO-E stakeholder engagement on mandated deliverables in 2017: - ENTSO-E stakeholder consultations on mandated deliverables (Network Codes, TYNDPs, Adequacy Reports, RDI activities, Annual Work Program, others):

Very satisfied

Please indicate your satisfaction with ENTSO-E stakeholder engagement on mandated deliverables in 2017: - ENTSO-E stakeholder workshops:

Very satisfied

Please indicate your satisfaction with ENTSO-E stakeholder engagement on mandated deliverables in 2017: - ENTSO-E stakeholder consultation tool:

Rather satisfied

Please indicate your satisfaction with ENTSO-E stakeholder engagement on mandated deliverables in 2017: - Other (please specify below):

No opinion

Comments:

We would wish ENTSO-E to be more transparent. In particular, we would like ENSO-E to engage with stakeholders at the beginning of developments, not when it has already fixed, developed, or internally-approved ideas or proposals. Giving affected stakeholders access from the start, e.g. drafting Network Codes, methodologies, etc. would give a more robust final product more quickly. We see no problem with sharing draft ideas, which everyone knows does not represent a final ENTSO-E view, and does not commit ENTSO-E to anything.

Q10 ENTSO-E plans to update its 2011 Consultation Process document as part of modernizing its stakeholder engagement approach.

Please provide us with your views on the following:

What additional areas, if any, should ENTSO-E address to improve its stakeholder engagement approach?

We repeat the comment we made above. We would like ENSO-E to engage with stakeholders at the beginning of developments, not when it has already fixed, developed, or internally- approved ideas or proposals. Giving affected stakeholders access from the start, e.g. drafting Network Codes, methodologies, etc. would give a more robust final product more quickly. We see no problem with sharing draft ideas, which everyone knows does not represent a final ENTSO-E view, and does not commit ENTSO-E to anything.

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What else could ENTSO-E do better regarding stakeholder engagement? :

We would like to see ENTSO-E consult more publicly and more often during the development and implementation processes. If ENTSO-E chooses who it consults with in private discussions, e.g. the Advisory Council, there is a danger that something or someone important will be missed. In our view it is always more efficient to ask publicly for stakeholders (who ENTSO-E may not have thought of) to identify themselves, by saying 'we think we are impacted too and here's what we think'. (This is a general preference for public consultations by anyone who is developing or implementing EU electricity market arrangements, not a comment targeted at ENTSO-E alone!)

Q13 Please indicate your opinion on ENTSO-E's stakeholder communications in 2017:

Please indicate your opinion on ENTSO-E's stakeholder communications in 2017: - Network Codes' communication:

Positive

Please indicate your opinion on ENTSO-E's stakeholder communications in 2017: - ENTSO-E communication on other legally-mandated deliverables (TYNDP, R&D, MAF, etc.):

No opinion

Please indicate your opinion on ENTSO-E's stakeholder communications in 2017: - ENTSO-E policy papers:

No opinion

Please indicate your opinion on ENTSO-E's stakeholder communications in 2017: - ENTSO-E website:

Positive

Please indicate your opinion on ENTSO-E's stakeholder communications in 2017: - ENTSO-E presence on social media:

No opinion

Please indicate your opinion on ENTSO-E's stakeholder communications in 2017: - ENTSO-E Friday round-up:

Very positive

Please indicate your opinion on ENTSO-E's stakeholder communications in 2017: - ENTSO-E outreach and dissemination events (ex. Annual conference, Regional conferences, etc.):

Positive

Please indicate your opinion on ENTSO-E's stakeholder communications in 2017: - ENTSO-E webinars:

No opinion

Other comments on ENTSO-E's stakeholder communications:

The ENTSO-E website used to have a glossary of Network Code and Guideline terms. This was a very useful resource, but it had started to go out of date and we are not sure whether the ENTSO-E website still has it? Now that the first set of Network Codes and Guidelines have all come into force, it would be very helpful if ENTSO-E could recreate this resource as it would help all stakeholders find the legal meaning of terms used across the Network Codes/Guidelines.

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Q14 What is your opinion on:

What is your opinion on: - ENTSO-E's profile on the Brussels scene:

No opinion

What is your opinion on: - ENTSO-E's profile as the European voice of TSOs:

No opinion

What is your opinion on: - ENTSO-E's profile as the focal point for all technical, market and policy questions related to the EU electricity system:

Negative

What is your opinion on: - ENTSO-E's advocacy:

Neutral

Comments:

We note the question on ENTSO-E's profile as 'the focal point for all technical, market and policy questions related to the EU electricity system' and we wanted to explain our negative response. We suggest that this is a dangerous belief for any organisation to have of itself i.e. that it is 'the focal point for all technical, market and policy questions' as it could give rise to thinking within that organisation that 'it knows best' in all these areas and so allows that organisation to develop less robust, untested, products. It is also a dangerous idea to sell to others as, if they believe it, they might give less robust challenge to proposals that need testing. In this particular case, it also ignores the knowledge and expertise residing in the many other EU stakeholders who have interests in the EU electricity system (regulatory; policy; academic; and market-orientated bodies, such as power exchanges and traders).

Q15 Compared to the year before, in 2017 ENTSO-E was:

Compared to the year before, in 2017 ENTSO-E was: - More visionary:

Neutral

Compared to the year before, in 2017 ENTSO-E was: - More transparent:

Neutral

Compared to the year before, in 2017 ENTSO-E was: - Better at communication:

Agree

Compared to the year before, in 2017 ENTSO-E was: - Demonstrating more coordination between TSOs:

No opinion

Compared to the year before, in 2017 ENTSO-E was: - Cooperating more closely and efficiently with ACER:

No opinion

Compared to the year before, in 2017 ENTSO-E was: - Improving engagement of its experts with NGOs or other interested parties:

Neutral

Compared to the year before, in 2017 ENTSO-E was: - Improving the follow-up on actions or changes, based on stakeholder feedback:

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Neutral

Compared to the year before, in 2017 ENTSO-E was: - Showing greater commitment to the regional cooperation agenda:

No opinion

Compared to the year before, in 2017 ENTSO-E was: - Other:

No opinion

Q16 Compared to the year before, in 2017 ENTSO-E demonstrated:

Compared to the year before, ENTSO-E demonstrates: - A more visible focus on serving the public interest:

Neutral

Compared to the year before, ENTSO-E demonstrates: - Greater awareness of the interests and concerns of others:

Neutral

Compared to the year before, ENTSO-E demonstrates: - Work product improvements linking these to stakeholder feedback:

Neutral

Compared to the year before, ENTSO-E demonstrates: - Leadership (where applicable) in implementing EU energy policy decisions:

Neutral

Q17 Taking all considerations into account, please indicate your overall opinion of ENTSO-E's work in 2017:

Taking all considerations into account, please indicate your overall opinion of ENTSO-E's work in 2017: - Taking all considerations into account, your overall opinion of ENTSO-E's work in 2017 is:

Neutral

Q18 Where did ENTSO-E do well in 2017?

Please provide your comments below:

The ENTSO-E stakeholder engagement events are always well run and very welcome.

We also believe that the ENTSO-E European Transparency User Group that it runs with stakeholders is very valuable.

Q19 Where could ENTSO-E do better in 2018?

Please provide your suggestions below:

ENTSO-E seems unnecessarily restrictive in allowing access to its SharePoint system: when non-TSOs are permitted to be part of user or working groups they are not allowed access to the relevant group documents on the system,

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which seems inefficient and counter-productive. Can a way be found to enable such access to just the relevant documents on the system, while maintaining the security/non-availability of the rest of the SharePoint system?

END