

**European Regulators Group  
For Electricity and Gas  
28 rue le Titien  
1000 Bruxelles**

Subject: ERGEG Guidelines for Good Practice on Information Management and  
Transparency in Electricity Markets

*Dear Sirs,*

Reference is made to the ERGEG Guidelines for Good Practice on Information Management and Transparency in Electricity Markets published under Ref: E05-EMK-06-10 on 15<sup>th</sup> of March, 2006.

We would like to confirm that the published materials found a lot of interest among members of the Polish Association of Energy Traders.

In opinion of our members problems of :

- transparency
- equal access to information
- information management

are the crucial problems to be resolved in process of the European wholesale energy market creation.

It is of utmost importance that the Guidelines were published by the body which has necessary power to implement such rules. Those rules are widely recognized as a very useful ones in nondiscriminatory electricity trading but very often they could not be implemented because not all parties involved were interested to share possessed information with the other market participants.

In our opinion not only equal access to information (timing and content) is so important to transparent market but as you emphasized in your Guidelines the ringfencing in some cases might be even more vital.

At the moment we are in the course of discussions in Poland among market participants like generators, distributors, energy traders and large customers represented by relevant Associations on range of available market information for all market participants. It is clear that result of those discussions would be some kind of compromise but the most important is that such compromised agreement is recognized and applied in practice by all parties involved.

In our opinion your Guidelines cover all aspects of energy trading but future success would depend on determination of the Regulators in every country in controlling implementation process by such institutions like TSOs, DSOs and PEXs which play key role in the whole structure.

Looking at the content of your Guidelines Annex Tables it is clear that behaviour of Operators which are the main source of market information, its approach to information policy and reliability of available information would be the decisive factor in implementation success.

As the Polish Association of Energy Traders we are of the opinion that the scope of information listed in Tables 1 to 5 of the Annex – Specification of the Required Transparency of Information - covers every aspect of energy trading.

As the information transparency plays key role in electricity market development we believe that ERGEG would have sufficient power and determination to implement discussed Guidelines as soon as possible.

Yours faithfully,

Marek Kulesa, Director, TOE