

OPINION No 10/2021
OF THE EUROPEAN UNION AGENCY
FOR THE COOPERATION OF ENERGY REGULATORS

of 2 December 2021

**on the third update of the manual of procedures for the ENTSO-E central
information transparency platform**

THE EUROPEAN UNION AGENCY FOR THE COOPERATION OF ENERGY
REGULATORS,

Having regard to Commission Regulation (EU) No 543/2013 of 14 June 2013 on submission and publication of data in electricity markets and amending Annex I to Regulation (EC) No 714/2009 of the European Parliament and of the Council¹, and, in particular, Article 5 thereof,

Having regard to Commission Regulation (EU) 2017/2195 of 23 November 2017 establishing a guideline on electricity balancing², and, in particular, Article 12(5) thereof,

Whereas:

1. INTRODUCTION

- (1) To that end, ENTSO-E submitted an updated MoP (version 3.0 of 20 March 2018), on which ACER issued its Opinion No 04/2018 of 13 June 2018³. In this Opinion, ACER recommended several amendments and invited ENTSO-E to revise the submitted MoP, to submit it to a public consultation, and to resubmit the draft revised MoP within six months for a new opinion by ACER.
- (2) On 4 December 2018, ENTSO-E resubmitted to ACER a revised version 3.1, dated 29 October 2018, of the MoP ('second update of the MoP'), as required by Article 12(5) of the EB Regulation, including an update of separate documents referenced in the updated MoP. The referenced documents included a Detailed Data Descriptions document, a Business Requirements Specification document and several implementation guides describing the standards and methods used for the submission

¹ OJ L163, 15.6.2013, p. 1.

² OJ L312, 28.11.2017, p. 6.

³ https://www.acer.europa.eu/Official_documents/Acts_of_the_Agency/Opinions/Opinions/ACER%20Opinion%2004-2018.pdf

and transfer of information. Additionally, on 14 December 2018 ENTSO-E submitted to ACER the responses received from its consultation of the ENTSO-E Transparency User Group (ETUG) members on selected aspects for the updated MoP.

- (3) On 30 January 2019, ACER issued its Opinion No 08/2019 on the updated MoP for the ENTSO-E central information transparency platform⁴. In this Opinion, ACER considered that the updated MoP fulfils the requirements for the publication of new balancing data items envisaged in the EB Regulation and meets the objective of the Transparency Regulation to ensure the provision of clear and timely information about balancing markets in a comparable format across borders. However, ACER included in its Opinion a number of recommendations of which some should have been addressed without delay, while others should have been implemented as soon as the relevant methodologies under the EB Regulation have been defined. In particular, certain aspects of the implementation of the European platforms pursuant to Articles 19 to 22 of the EB Regulation ('European Platforms') were not included in this updated MoP since the approval process of the respective proposals was still ongoing. The implementation frameworks ('IFs') of the European Platforms pursuant to Articles 20 to 22 of the EB Regulation have been approved by a set of ACER Decisions: ACER Decision No 02/2020⁵ on the Implementation framework for the European platform for the exchange of balancing energy from frequency restoration reserves with automatic activation ('aFRR IF'), ACER Decision No 03/2020⁶ on the Implementation framework for the European platform for the exchange of balancing energy from frequency restoration reserves with manual activation ('mFRR IF'), and ACER Decision No 13/2020⁷ on the Implementation framework for the European platform for the imbalance netting process ('IN IF').
- (4) On 6 October 2021, ENTSO-E resubmitted to ACER a revised version 3.3, dated 5 October 2018, of the MoP ('third update of the MoP'), as required by Article 12(5) of the EB Regulation, including an update of separate documents referenced in the MoP. The referenced documents included a Detailed Data Descriptions ('DDD') document, a Business Requirements Specification ('BRS') document and several implementation guides describing the standards and methods used for the submission and transfer of information. Prior to the submission of the third update of the MoP, in accordance with

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https://documents.acer.europa.eu/Official_documents/Acts_of_the_Agency/Opinions/Opinions/ACER%20Opinion%2008-2019%20on%20amended%20MOP%20for%20ENTSO-E%20Central%20Information%20Transparency%20Platform.pdf

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https://extranet.acer.europa.eu/Official_documents/Acts_of_the_Agency/Individual%20decisions/ACER%20Decision%2002-2020%20on%20the%20Implementation%20framework%20for%20aFRR%20Platform.pdf

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https://extranet.acer.europa.eu/Official_documents/Acts_of_the_Agency/Individual%20decisions/ACER%20Decision%2003-2020%20on%20the%20Implementation%20framework%20for%20mFRR%20Platform.pdf

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https://extranet.acer.europa.eu/Official_documents/Acts_of_the_Agency/Individual%20decisions/ACER%20Decision%2013-2020%20on%20Implementation%20framework%20for%20imbalance%20netting.pdf

the Transparency Regulation, ENTSO-E had conducted a public consultation with stakeholders and organised a dedicated workshop with the ETUG to facilitate users' feedback.

2. ASSESSMENT OF THE THIRD UPDATE OF THE MANUAL OF PROCEDURES

2.1. Legal framework

- (5) According to Article 5 of the Transparency Regulation, the MoP for the central information transparency platform has to specify: the details and format of the submission of data laid down in Article 4(1) of the same Regulation; standardised ways and formats of data communication and exchange between primary owners of data, transmission system operators ('TSOs'), data providers and ENTSO-E; the technical and operational criteria which data providers need to fulfil when providing data to the central information transparency platform; and an appropriate classification of production types referred to in Articles 14(1), 15(1) and 16(1) of the same Regulation.
- (6) Moreover, according to Article 5 of the Transparency Regulation, ENTSO-E has to update the MoP when necessary and, before updating it, to submit a draft to ACER for an opinion, which is to be provided within two months.
- (7) According to Article 12(5) of the EB Regulation, each TSO has to publish certain balancing-related pieces of information, as defined in paragraph 3 of the same Article, in a commonly agreed harmonized format, at least through the central information transparency platform, and ENTSO-E has to update the MoP referred to in Article 5 of the Transparency Regulation accordingly and submit it to ACER for an opinion.
- (8) As above mentioned, certain aspects of the implementation of the European balancing platforms pursuant to Articles 19 to 22 of Regulation (EU) 2017/2195 were not included in the previous update of the MoP since the approval process of the IFs underlying these platforms was still ongoing. The present update of the MoP submitted to ACER follows the approval of the IFs by the above mentioned ACER Decisions No 02/2020⁵, No 03/2020⁶ and No 13/2020⁷.

2.2. General comments

- (9) The third update of the MoP consists of a concise 'basic document' that refers to more detailed documents (referenced documents), such as the DDD document and the BRS document. Since the DDD document is the basis used for the elaboration of the other implementation guides, which are mainly relevant for data providers, this Opinion focuses on the DDD document, and its extension as further described below.
- (10) For additional reporting requirements related to European Platforms stemming from ACER Decisions No 02/2020⁵ on aFRR IF, No 03/2020⁶ on mFRR IF and No 13/2020⁷ on IN IF, ENTSO-E produced a set of extension documents to the DDD. In addition to the DDD document, this Opinion focuses mainly on the extension document 'European

platforms' implementation frameworks - extensions to Detailed Data Description for Transparency Platform'('IF extension document').

- (11) ACER notes that the IF extension document has not been referenced in the DDD and therefore risks hindering future consistency and coordination between all data items which are split between different documents. Thus, to increase consistency of data and remove ambiguity, ACER considers it appropriate to merge the IF extension document with the DDD into a single document where data is organised per category rather than per point in time when the updates of the MoP are realised.

2.3. Comments on the updates concerning balancing data items

2.3.1. Changes to the DDD related to balancing data items

2.3.1.1. (Alignment of) Definitions

- (12) Regarding the definitions, ENTSO-E has extended a list of existing definitions to include the terms already defined in the EB Regulation, the Transparency Regulation, or in the methodologies approved since the previous version of the DDD. More specifically, ENTSO-E included a definition of 'cross-border marginal price' ('CBMP'), 'European Platform' and 'imbalance netting' ('IN'). ACER considers that this amendment contributes to the consistent publication of data.
- (13) Furthermore, ENTSO-E added a new definition of 'local product' as a balancing product that is neither a standard product nor a specific product and may be used to describe legacy products in the interim period until standard and specific products have become completely specified. In order to remove ambiguity, ACER would like to advise that the definition of local product is updated to ensure that local products as defined by ENTSO-E can only be used in the interim period until a TSO has not joined the European Platforms. As soon as the TSO joins the European Platforms, there should only be standard and specific products available.
- (14) Lastly, ENTSO-E made a distinction between mFRR direct and scheduled activation and introduced a definition for each. 'Direct activation' is defined as the activation of active power reserves that may be initiated at any point in time after scheduled optimization has begun for given MTU and 'scheduled activation' as the activation of active power reserves that may only occur at a specific point in time in relation to given MTU. ACER considers it advisable to follow as closely as possible the terminology used in the mFRR IF.
- (15) Regarding terminology used for prices of activated energy, ACER recommends to replace the terms 'upward regulation' and 'downward regulation' with the terms 'positive balancing energy' and 'negative balancing energy' to align it with the EB Regulation and with the Methodology for pricing balancing energy (taken by ACER Decision 01/2020). Following that, it is important in ACER's view that the sign convention is used for the volumes and prices of balancing energy in a way that the volume of 'positive balancing energy' has a positive sign and the volume of 'negative balancing energy' has a negative sign and depending on the sign of the balancing energy

price (positive or negative), the direction of payment between TSO and BSP is determined as shown in Table 1 of the EB Regulation.

- (16) ACER recommends that the terminology used in the definitions, as well as throughout the MoP document follows as closely as possible the same terminology used in the EB Regulation, in the Implementation Frameworks and in approved methodologies from the EB Regulation.

2.3.1.2. Changes to specific balancing data items of the DDD

- (17) Regarding the relation between data items to be published under Articles 17(1)(b), 17(1)(c), 17(2)(a) and 17(2)(b) of the Transparency Regulation, data has been merged into a single category to include both the amount and prices paid for balancing reserves per contract. ACER welcomes this merging of related data items into a single category as this allows better readability of the DDD and easier user navigation when applying these terms in the Transparency Platform.
- (18) A data description for requirements for publication of data under Article 17(1)(f) of the Transparency Regulation on publication of prices for balancing energy, and under Article 12(3)(b) and Article 12(3)(e) of the EB Regulation on balancing energy bids and aggregated balancing energy bids has been amended to include data separately for scheduled and direct mFRR activation types. ACER considers this as an important improvement as it contributes to the consistency of published data.
- (19) Further amendments have been made by ENTSO-E to include the requirements stemming from different methodologies approved since the previous version of the MoP.
- (20) In particular, data description for requirements for publication of data under Article 12(3)(b) of the EB Regulation on balancing energy bids has been additionally amended to include requirements from the Methodology for classifying the activation purposes of balancing energy bids approved by ACER Decision No 16/2020 ('Activation Purposes Methodology') to include reasons for declaring bids as unavailable. ACER considers it important to clarify that, according to the Activation Purposes Methodology, each TSO should define the activation purpose of an activated balancing energy bid from the common merit order list after being declared as unavailable by the TSO and that possible activation purposes can be balancing and system constraints; where the information is available, the TSO activating balancing energy bids for the activation purpose should publish if the balancing energy bids were activated for redispatching or countertrading or for other remedial actions. In ACER's view this clarification should be made explicit in the DDD in order to provide more clarity for market participants.
- (21) Additionally, data description for requirements for publication of data under Article 17(1)(f) of the Transparency Regulation on prices of activated balancing energy has been additionally amended to include a reference to the Methodology for pricing balancing energy (approved by ACER Decision No 01/2020) and data description for requirements for publication of data under Article 17(1)(g) of the Transparency

Regulation on imbalance prices has been additionally amended to include requirements from the Methodology for the harmonisation of the main features of imbalance settlement (approved by ACER Decision No 18/2020). ACER welcomes that the new requirements arising from approved methodologies are added to the DDD.

- (22) Lastly, data description for requirements for publication of data under Article 12(3)(k) of the EB Regulation on the algorithm publication has been amended to include the imbalance netting process. ACER considers that this amendment contributes to consistent publication of data.

2.3.2. Extension to DDD to include requirements from the balancing Implementation Frameworks

- (23) As referenced in paragraph (10) of this Opinion, this section focuses on specific balancing data items from the ‘IF extension document’ submitted by ENTSO-E to include additional reporting requirements from the Implementation Frameworks. The following categories have been included: balancing border capacity limits, permanent allocation limitations to cross-border capacity on HVDC lines, netted and exchanged volumes, fall-backs, elastic demands, changes to bid availability and cross-border marginal prices for aFRR standard products.
- (24) Regarding the terminology used in the IF extension document, ACER advises to use the same terms as used in the IN IF, aFRR IF and mFRR IF in order to remove ambiguity and ensure consistency throughout the documents. This particularly refers (but not excluded) to using terms like ‘balancing border capacity limitations’ instead of ‘balancing capacity border limits’ in the ‘Scope’ section of the document and using the term ‘net positions’ which is defined in Commission Regulation (EU) 2015/1222⁸ instead of using ‘exchanged volumes’ as defined in the aFRR IF and mFRR IF.
- (25) Regarding data items highlighted by ENTSO-E to be published at ‘a later stage’ (e.g. information about TSOs requesting particular data items, inclusion of additional reasons whenever the adjustment to the balancing border capacity limit has been applied), ACER advises that ENTSO-E provides as soon as possible a clear timeline when those data items will be published. This is important for regulatory authorities to oversee the implementation of all the data publication requirements envisaged in the EB Regulation and for market participants to be able to anticipate changes in the Transparency Platform.
- (26) Regarding specific requirements to publish balancing border capacity limits in accordance with Articles 4(3) and 4(4) of the IN IF, Articles 4(3) and 4(4) of the aFRR IF and Article 4(3) and 4(4) of the mFRR IF, ACER advises to redraft the category text so that it follows the requirements from the above-mentioned IFs, especially with respect to the timing of the publication of the specific data items. In addition, ACER advises ENTSO-E to update the category text to ensure that the requirement to publish

⁸ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015R1222&from=EN>

balancing border capacity limits is per market time unit and not per imbalance settlement area. This becomes particularly relevant for aFRR service as the market time unit is smaller than the imbalance settlement period. Thus, data should be published after the end of relevant market time unit.

- (27) Regarding requirements to publish the exchange of volumes and prices provided by the activation optimisation function ('AOF') in accordance with Article 3(10) of the IN IF, Article 3(16) of the aFRR IF and Article 3(17) of the mFRR IF, ENTSO-E has split the data descriptions into different categories of the IF extension document and the DDD document. For example, in the current version, the requirement to publish aFRR CBMP is explained in the IF extension document while the requirement to publish mFRR CBMP is explained in the DDD document. Once more, ACER advises that all data items to be published are described in a single document (in the DDD document) and organised in meaningful categories in order to allow easier and more consistent navigation through the document.
- (28) Lastly, ACER considers it appropriate to update data description of the volumes to be published in accordance with Articles mentioned in the previous paragraph (paragraph (27)) to ensure that not only the aggregated volumes of import and export flows are published, but also the volumes per each balancing border are published.

2.4. Comments related to other aspects of the Manual of Procedures

2.4.1. Urgent need to ensure compliance with the current version of the MoP with regard to balancing data items

- (29) The previous update of the MoP (i.e. version 3.2), was adopted by ENTSO-E on 21 June 2021. The implementation of changes related to any update of the transparency platform are always twofold. On the one hand, ENTSO-E has to implement the updated functionalities in the transparency platform; on the other hand, TSOs and other data providers need to adapt their systems to provide the data in compliance with the MoP.
- (30) Based on previously communicated timelines, ENTSO-E envisaged to finalise the implementation of the updated functionalities related to the version 3.2 in September 2019; the communicated timeline also envisaged that TSOs should be able to adapt their systems to submit data to the transparency platform, right after ENTSO-E finalised its own updates of the TO, with a transitional period spanning throughout 2020. This means that all TSOs and data providers should have started to submit the data in compliance with the version 3.2 of the MoP as of 1 January 2021 at the very latest.
- (31) However, ACER observes that:
- a. While, in general, ENTSO-E adapted the transparency platform functionalities according to the above mentioned timeline, TSOs are not in general, in compliance with the version 3.2 of the MoP. While ACER did not conduct exhaustive review of the status of the implementation for all data items and TSOs (or data providers) according to version 3.2 of the MoP, ACER identified that one of the main changes described in the DDD was not yet implemented. Such a change refers to the replacement

of the relevant geographical area names, i.e. shifting from ‘Market Balance Area’, to the ‘Scheduling Area’, ‘Imbalance Area’ and ‘Imbalance Price Area’, depending on the data items. More than 2 years after ENTSO-E enabled the functionality according to the updated MoP, the data is still published in ‘Market Balance Area’ granularity for the majority of the balancing data items. In addition, ACER observed that when the new geographical areas (‘Scheduling Area’, ‘Imbalance Area’ and ‘Imbalance Price Areas’) are used for reporting, they are often not in line with the MoP. For example:

- i. The Imbalance Prices [17.1.G] should be configured and reported by using ‘Imbalance Price Area (IPA)’; however the TSOs from BE, AT, RO, FR, EE, LV, LT are configured and reported by using ‘Scheduling Area’, while FI is configured as ‘Imbalance Area (IBA) and reported as ‘Scheduling area’-
 - ii. The publication of the Total Imbalance Volumes [17.1.H] should be configured and reported by using ‘Imbalance Area’; however the TSOs from AT, DE, FR, LV, LT, EE, SEM, RO are configured and reported by using ‘Scheduling Area’.
 - b. ENTSO-E still allows to provide the data by using the outdated ‘Market Balance Area’ concept. Such an approach of ENTSO-E does not incentivise TSOs to comply with the updated MoP. This approach contributes to inconsistent, uncoordinated reporting leading to confusion of the users of the transparency platform.
- (32) With regard to the transparency platform website user interface, ACER's view is that ENTSO-E has done important steps to improve the user friendliness of the platform. However, from the perspective of the Balancing domain, additional efforts should be made, to address a number of remarks communicated by ACER at an earlier stage of the review process, for example:
 - a. The names of the Data views should be better described and more intuitive for the end user (e.g. ‘Balancing category’ instead of ‘Capacity’, ‘Energy bids (offered and activated)’ as opposed to ‘Bids’.
 - b. When two or more data items use different geographical areas, then joining them into a single data view (i.e. a single table of the transparency platform) should be avoided. For example, Imbalance prices [17.1.G] and Total Imbalance Volumes [17.1.H] are to be reported by using different geographical areas (‘Imbalance price area’ and ‘Imbalance areas’ respectively), therefore they should be published into different data views.
- 2.4.2. Need to publish a calendar for the implementation of the changes included in the review of the MoP
- (33) ACER deems it crucial that within 2 months following this Opinion, ENTSO-E and TSOs publish a calendar including the following:

- a. The precise deadlines for the effective implementation of the various changes to the Transparency Platform, which would enable TSOs (and other data providers if applicable) to start submitting the data in line with the updated MoP.
- b. The latest date(s) when TSOs (and other data providers if applicable) are required to comply with the updated MoP.

2.4.3. Data quality

(34) Although the main purpose of this updated MoP is to incorporate data items required by the EB Regulation, ACER reiterates the concerns, expressed in its Opinion No 04/2018, regarding the lack of clear procedures described in the DDD document to address data quality issues. Quality issues include in particular when TSOs or other data providers systematically deviate from the requirements prescribed in the applicable version of the MoP, as it can be currently observed. While ENTSO-E is not explicitly obliged to ensure compliance of the data providers with the the Transparency Regulation, it is best placed to facilitate data completeness, homogeneous data formats and data quality, and it should strive to do so as much as possible. For example, it should ensure that the submission of data using formats that are not in line with the MoP, as it has been described in this Opinion, is not allowed. These concerns remain and are therefore still to be addressed.

3. **CONCLUSION**

(35) ACER considers that, subject to the implementation of the recommendations included below, the updated MoP fulfils the requirements for the publication of the balancing data items envisaged in the EB Regulation. In particular, the updated MoP takes into account the additional requirements set out in the IFs, and meets the objective of the Transparency Regulation to ensure the provision of clear and timely information about balancing markets in a comparable format across borders.

(36) In addition, ACER observes that a calendar for the implementation of the updated MoP is also missing, this is all the more important, given that the implementation of the version 3.2 of the MoP, that has been published as the current version, is still pending, more than 2 years after such version was released.

(37) Finally, ACER understands that the implementation of the European Platforms is of highest priority at the moment. However, once the European Platforms are implemented and data related to them being published, ACER sees the need for ENTSO-E to re-asses the DDD document with respect to balancing data items and check if the data descriptions need to be amended.

HAS ADOPTED THIS OPINION:

1. ACER finds that subject to the implementation of the recommendations included below, the updated Manual of Procedures fulfils the requirements for the publication of the balancing data items envisaged, and meets the objective of Commission Regulation (EU)

No 543/2013 to ensure the provision of clear and timely information about balancing markets in a comparable format across borders.

2. With regard to the documents of the Manual of Procedures, ACER recommends the following:
 - a. That the document describing the publication of data from the Implementation Frameworks is integrated in the ‘Detailed Data Descriptions’ document.
 - b. That the terminology used in the Manual of Procedures is further aligned with the terminology used in Commission Regulation (EU) 2017/2195 and in the implementation frameworks pursuant to Articles 20 to 22 of the said Regulation that have been approved by a set of ACER Decisions, namely ACER Decision No 02/2020⁹ on the Implementation framework for the European platform for the exchange of balancing energy from frequency restoration reserves with automatic activation (‘aFRR IF’), ACER Decision No 03/2020¹⁰ on the Implementation framework for the European platform for the exchange of balancing energy from frequency restoration reserves with manual activation (‘mFRR IF’), and ACER Decision No 13/2020¹¹ on the Implementation framework for the European platform for the imbalance netting process (‘IN IF’).
 - c. That, besides the publication of aggregated volumes of import and export flows by the activation optimisation function, the publication of exchanged volumes on European Platforms for each bidding zone border is also envisaged in ‘Detailed Data Descriptions’ document, as required by Article 3(10) of the IN IF, Article 3(16) of the aFRR IF, and Article 3(17) of the mFRR IF.
 - d. That for data items related to additional publication requirements from the implementation frameworks, according to Articles 20 to 22 of Commission Regulation (EU) 2017/2195, whose publication is described to take place ‘at later stage’, ENTSO-E provides a clear publication timeline in the ‘Detailed Data Descriptions’ document.
 - e. That the ‘Detailed Data Descriptions’ document envisages the publication at Market Time Unit level when the Market Time Unit is smaller than the Imbalance Settlement Period and the regulation requires publication per Market Time Unit.

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https://extranet.acer.europa.eu/Official_documents/Acts_of_the_Agency/Individual%20decisions/ACER%20Decision%2002-2020%20on%20the%20Implementation%20framework%20for%20aFRR%20Platform.pdf

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https://extranet.acer.europa.eu/Official_documents/Acts_of_the_Agency/Individual%20decisions/ACER%20Decision%2003-2020%20on%20the%20Implementation%20framework%20for%20mFRR%20Platform.pdf

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3. ACER recommends ENTSO-E to publish a calendar for the implementation of the updated version of the Manual of Procedures, within two months following this opinion. Such a calendar should include:
 - a. The precise deadlines for the effective implementation of the various changes to the Transparency Platform, which would enable TSOs (and other data providers if applicable) to start submitting the data in line with the updated Manual of Procedures.
 - b. The latest date(s) when TSOs (and other data providers if applicable) are required to comply with the updated Manual of Procedures.
4. ACER recommends that, once the European Platforms in accordance with Articles 20 to 22 of Commission Regulation (EU) 2017/2195 are implemented and data related to them is published, ENTSO-E reassesses if the data descriptions need to be adapted. Although this re-assessment should be exhaustive, it should at least include a review of the definitions and requirements related to the following data items: ‘complex balancing energy bids’, ‘unavailability of bids’ and ‘activation purposes’.
5. ACER recommends to finalise without delay, the implementation of the version 3.2 of the Manual of Procedures. In order to do so, ACER recommends ENTSO-E to discontinue, as soon as possible, the option of publishing according to outdated versions of the Manual of Procedures, and to inform TSOs accordingly so that TSOs comply, as soon as possible, with the current version 3.2 of the Manual of Procedures.
6. ACER recommends ENTSO-E to enhance the friendliness of the navigation across balancing data items, in the transparency platform, e.g. by using more intuitive names for describing the ‘data views’ and by avoiding the display of two data items in the same view that require different types of geographical areas for reporting.
7. ACER reiterates the need to further enhance, in the Manual of Procedures, the description of procedures to address data quality issues within the scope of ENTSO-E’s competences.

This Opinion is addressed to ENTSO-E.

Done at Ljubljana, on 2 December 2021.

- SIGNED -

*For the Agency
The Director*

C. ZINGLERSEN