

1

2 TO: consultation.acer@entsoe.eu

3

4 TO: ACER – Agency for the Cooperation of the Energy Regulators

5 TO: ENTSO-E – European Network of Transmission System Operators for Electricity

6

7

8 **Public opinion about the establishment of European Network Code Stakeholder Committees**

9

10

11 First of all, a lot of thanks to ACER and ENTSO-E for organising this important consultation.

12

13 This opinion represents an opinion of an individual citizen, not any legal entity.

14

15 This opinion does not contain:

16 – any business secrets

17 – any trade secrets

18 – any confidential information.

19

20 This opinion is public.

21

22 ACER and ENTSO-E can add the PDF file of this opinion to a relevant web page.

23

24

25 Annex 1 holds information about previous consultations.

26 Annex 2 holds information about disclaimers and copyright.

27

28

29 Best Regards,

30

31

32

33 Jukka S. Rannila

34 citizen of Finland

35

36 signed electronically

37

38

39 [Continues on the next page]

40

41 **General: Previous consultations**

42

43 I gave earlier opinions to ACER, and PDF files of those opinions are on the following page:

44

45 EN: Opinion 34: REMIT Registration Format

46 http://www.jukkarannila.fi/lausunnot.html#nro_34

47

48 EN: Opinion 43: Publication of extracts of the European register of market participants

49 http://www.jukkarannila.fi/lausunnot.html#nro_43

50

51 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)

52 http://www.jukkarannila.fi/lausunnot.html#nro_53

53

54 EN: Opinion 55: European Energy Regulation

55 http://www.jukkarannila.fi/lausunnot.html#nro_55

56

57 SO, in this Opinion there should be some new insights about the establishment of European
58 Network Code Stakeholder Committees.

59

60 **Limitation: Opinion of an individual citizen – not any legal entity**

61

62 Since this opinion is created by an individual citizen, the knowledge base for this consultation is
63 naturally rather limited, since there has not been a group of experienced experts writing this
64 opinion.

65

66 **About the proposed IT platform / This opinion is mostly about information technology**

67

68 There are different opinions listed on the annex 1 page. In many cases opinions have been about
69 information technology issues. It can be noted, that also this limited opinion presents some
70 observations about information technology.

71

72 **NOTE: This opinion is mostly about the proposed IT platform.**

73

74 **More and more different codes and/or identifiers (ID)**

75

76 On previous consultation documents are different observations about different codes and/or
77 identifiers (ID).

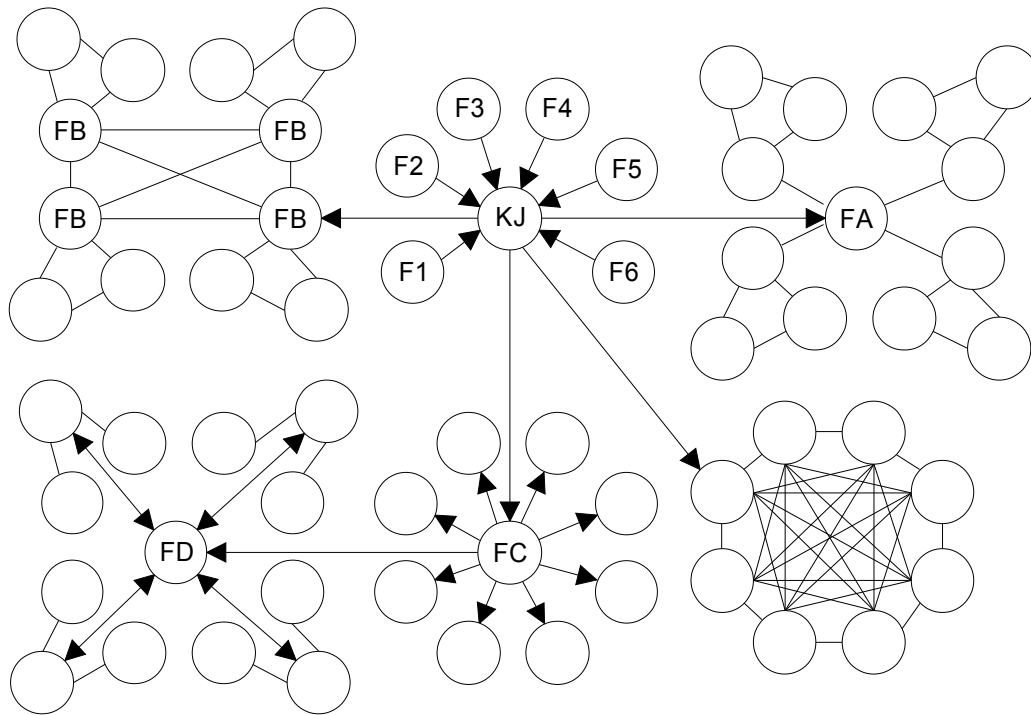
78

79 It can be noted, that the number of different codes and/or identifiers (ID) is increasing gradually in
80 different application fields – some codes and/or identifiers (ID) are private and some codes and/or
81 identifiers (ID) are public.

82

83 In reality different codes and/or identifiers (ID) are layered and there can be several versions for
84 different codes and/or identifiers (ID).

85 The following figure is a conception of different layered information systems.
86



87
88
89 Like the figure indicates, there can be several formats (FA-FD and FI-F6) to be used in different
90 information systems. Different information systems have also internal identifiers (ID) and external
91 identifiers (ID) for (possible) public usage. The added value for different stakeholders is provided
92 by combination of different identifiers (ID) in a specific information system.

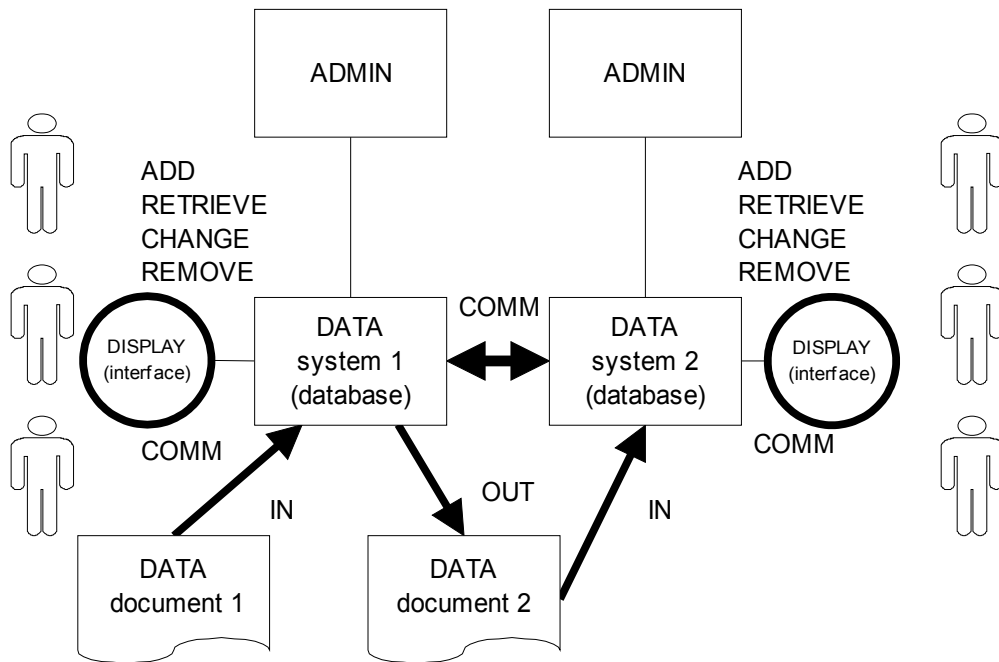
93
94 **Proposal: There could be some assessment(s) based on different versions of different**
95 **codes and/or different identifiers (ID).**

96
97 It can be possible, that there are some legacy identifiers (ID) in the near future. It can be possible,
98 that gradually some legacy identifiers (ID) can be consolidated for more standardised identifiers
99 (ID), but this consolidation means some serious technical and administrative actions.

100
101 Like the next figure indicates, there are databases in different information systems. Then there are
102 different documents for transmitting data between different system.

103
104 Here we can note especially following standardisation needs for different parts of the proposed IT
105 platform:

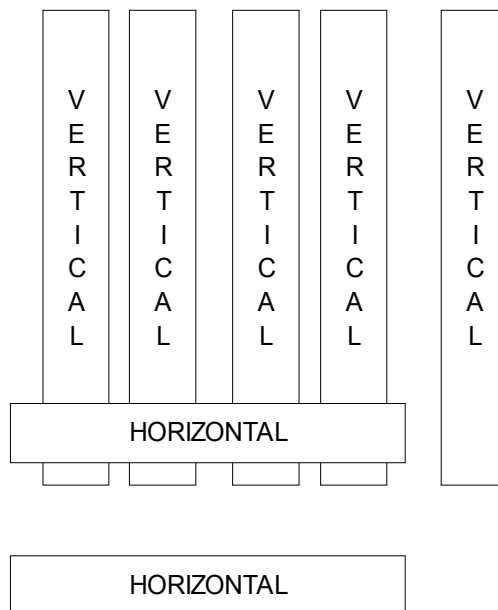
- 106 * communication standards
- 107 * data standards (also document standards)
- 108 * database standards
- 109 * display / interface standards.



111
112
113
114
115
116
117

Proposal: There could different standardisation efforts for communication, data, document, database, display/interface standards.

Horizontal standards and vertical standards for system-to-system communication



118
119
120

In previous opinions I have advocated developing different horizontal standards.

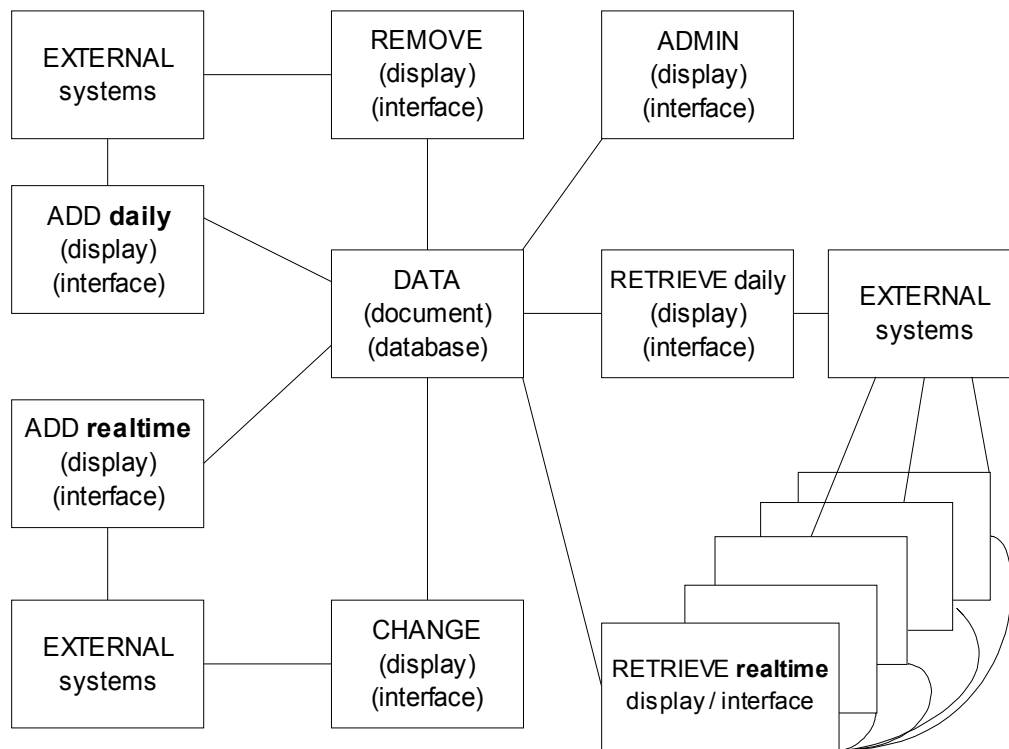
121 **Proposal: There could be some assessment(s) for comparing different horizontal**
 122 **standards.**

123
 124 **Proposal: There could be some assessment(s) for comparing different vertical standards.**
 125

126 One example of an horizontal standard is the email standard, since there are several vertical
 127 systems, which comply with email standards, and email messages can be transmitted between
 128 different email systems based on very different technological solutions.

129
 130 **Proposal: Developing different horizontal standards could be favoured.**

131
 132 **Different timeframes for different information systems**
 133



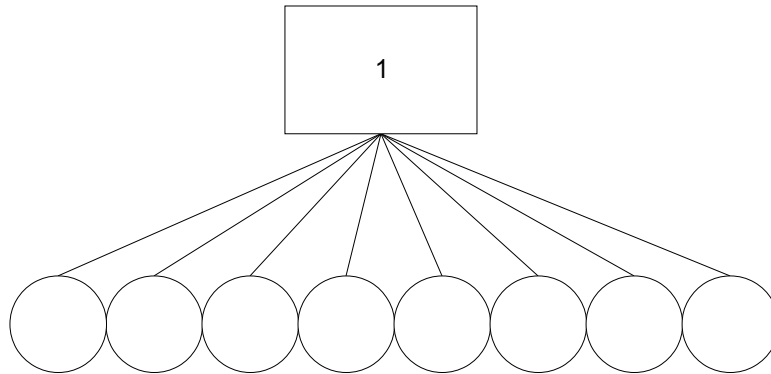
134
 135
 136 Like the previous figure indicates, there is difference between realtime systems and other systems.
 137

138 **Proposal: There can be different realtime systems, and the need for different realtime**
 139 **systems could be assessed.**

140
 141 **Proposal: There can different systems with other timeframes, and the need for systems**
 142 **should with different timeframes could be assessed**

143
 144 In some cases there is a clear need for different replicated information systems.
 145

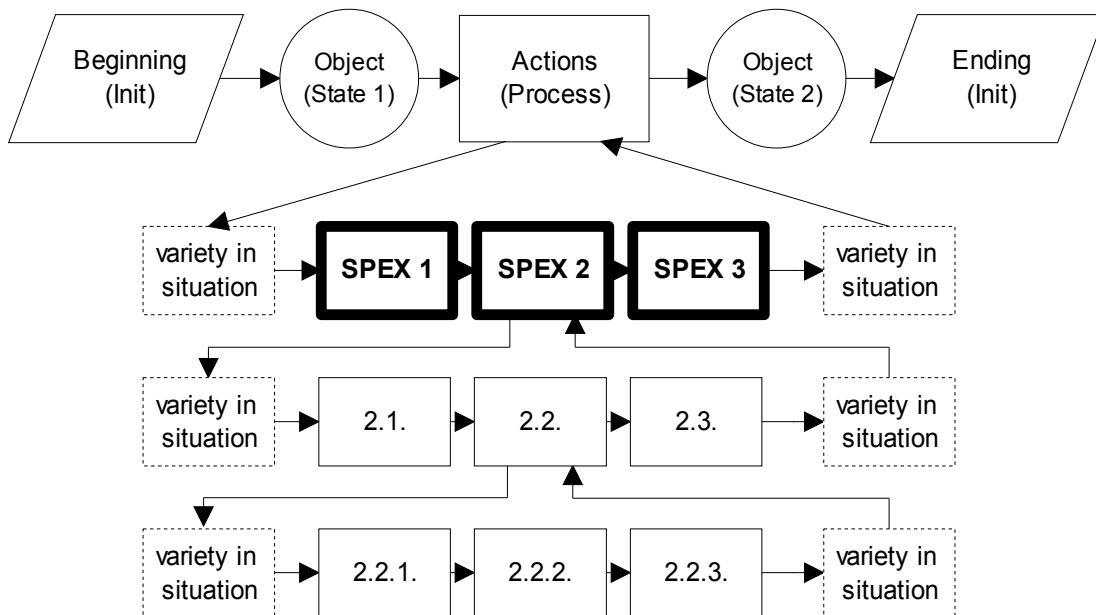
146 **Need for different interfaces and different displays**
 147



148
 149
 150 Previous proposal leads to a need for different interfaces and different displays. It can be noted, that
 151 different stakeholder groups need different interfaces and different displays.

152
 153 **Proposal: There could be some serious assessment about different interfaces and**
 154 **different displays.**

155
 156 In previous consultations I have advocated standardising interfaces and displays.
 157



158
 159
 160 **Proposal: After some serious assessment there could be some serious work for**
 161 **standardised (SPEX) interfaces and displays.**
 162

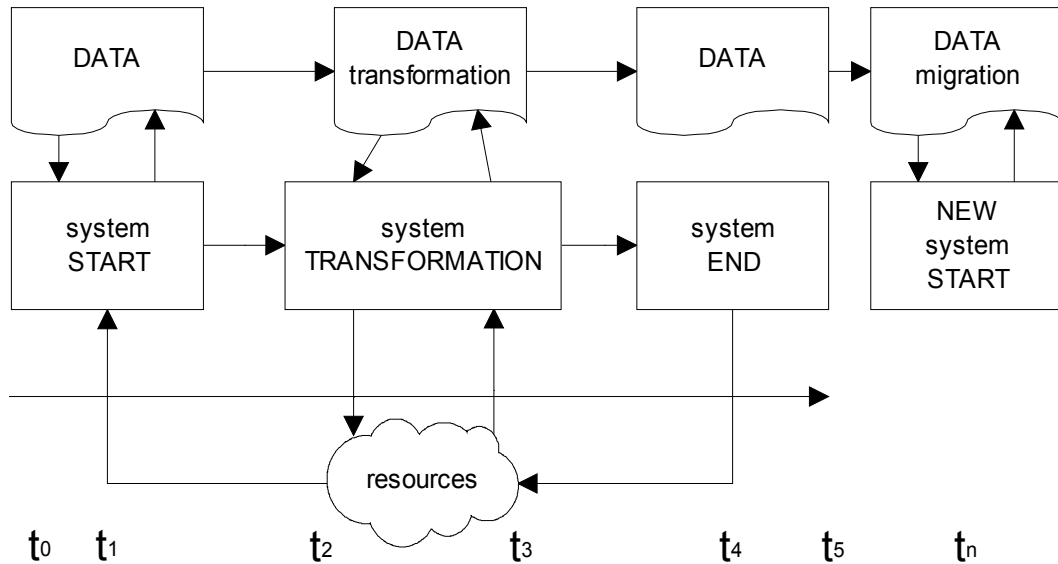
163 It can be noted, that several systems could implement (SPEX) the same parts of different processes,

164 even though the technology in different systems can be totally different.

165

166 **Different life-cycles between different information systems**

167



168

169

170 In reality, there are different life-cycles between different information systems. Like previously
 171 noted, there can be different documents for transmitting data between systems – also system-to-
 172 system communication is possible.

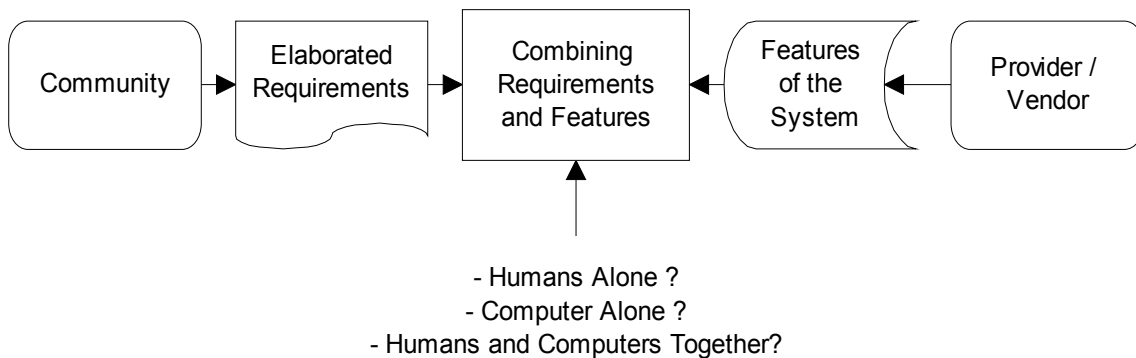
173

174 In some cases extraction of data from an old system to a new system may be very difficult. Like
 175 noted before, there can be some legacy systems, and those systems can mean serious problems in
 176 the near future.

177

178 **Difference between requirements and features**

179



180

181

182 It can be noted, that network codes mean developing different information technology (IT)

183 solutions, and network codes mean different IT projects – this is not a news item.

184

185 However, different requirements for an IT system can be described in many ways, and there can be
186 mismatches between features and requirements. Also, the division of labour between humans and
187 computers can cause problems, and there are always real possibilities for creating cumbersome IT
188 solutions.

189

190 **Note: Previously mentioned standardisation (SPEX) of interfaces and/or displays can**
191 **be realised with very different information technology solutions.**

192

193 There could be division for back-office systems and front-office systems. It is clear that the
194 proposed IT platform is about front-office system, since it is proposed to be open for (all?)
195 interested stakeholder groups.

196

197 **Proposal: Back-office systems and front-office systems could be consolidated.**

198

199 **One example of back-office system and front-office system integration**

200

201 In the previous consultations I have used web feeds as an example.

202



203

204

205 To be precise, there are some standards for ¹ web feeds: RSS 2.0 ² standard and Atom ^{3 4} standards.
206 There are different systems, which comply with these example standards (RSS and Atom)
207 differently.

208

209 It can be noted, that different back-office systems (with a wide variety of different technologies) can
210 implement RSS standards, and these RSS feeds can be used in the front-office systems. With this
211 kind solutions front-office systems dont need direct system-to-system communications with back-
212 office systems.

213

214 **The current reality in different member states**

215

216 Like said before, there can be a wide variety of different technologies to be selected to different
217 information systems.

218

219 One problem is naturally complex system-to-system connections, and this can lead to very serious
220 problems in the maintenance and development

221

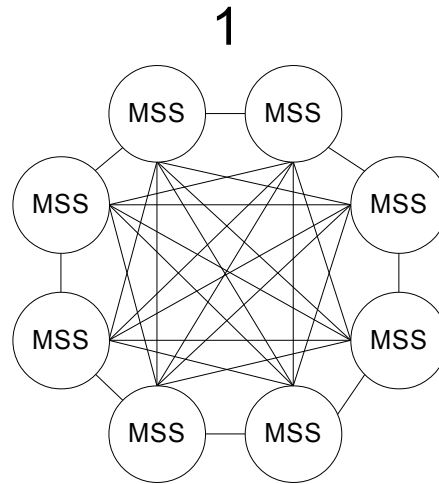
1 http://en.wikipedia.org/wiki/Web_feed, Web feed

2 <http://www.rssboard.org/rss-specification>,

3 <http://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

4 <http://tools.ietf.org/html/rfc5023>, The Atom Publishing Protocol

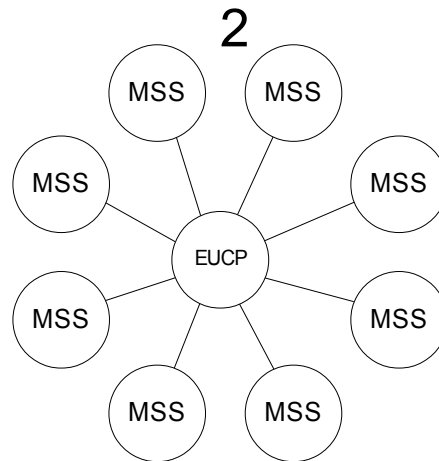
222 The next figure tries to describe this situation.
 223



MSS = member state system

224
 225
 226
 227 It can be possible in some member states (European Union), that the systems in a member state is
 228 highly interconnected.
 229

230 One obvious solution is to have an European contact point, and different member state system could
 231 be connected.



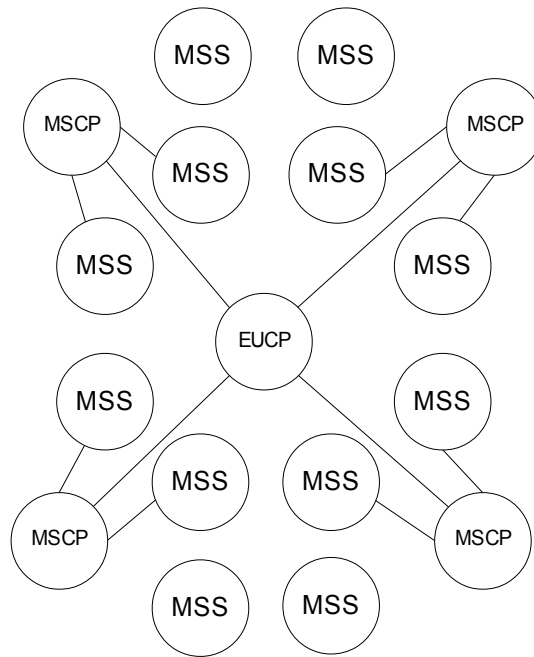
MSS = member state system
EUCP = European Union contact point

232
 233
 234
 235
 236 In reality having one European Union contact point can lead to a situation with too many
 237 connections, and this can lead to different IT havocs when the European Union contact point is
 238 facing different problems.
 239

240 Therefore it is better to have member state contact points. These member state contact points can

241 collect needed information from different member state systems. In this way European Union
 242 contact point would have less pressure.

3



MSS = member state system
MSCP = member state contact point
EUCP = European Union contact point

243
 244
 245 It can be also noted, that different member state systems have different life-cycles. Some member
 246 state systems can be terminated is some timeframes. Also some new systems can be created to have
 247 more functions than the previously terminated systems.

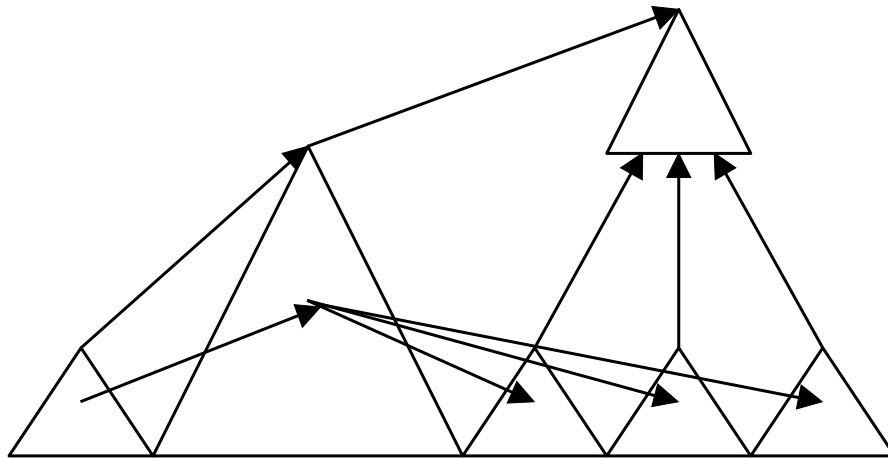
Changes in the organising / organisational modes

252
 253 Here can be noted, that there will be changes in different communities, and organising /
 254 organisational modes will change.

255
 256 In many cases original community can grow larger. Then there is a question about communication
 257 problems and management problems in different communities. This problem can lead to division of
 258 the original organisation to smaller entities. Then these smaller entities can work more efficiently.

259
 260 **Note: The change in different levels will be a constant/enduring issue.**

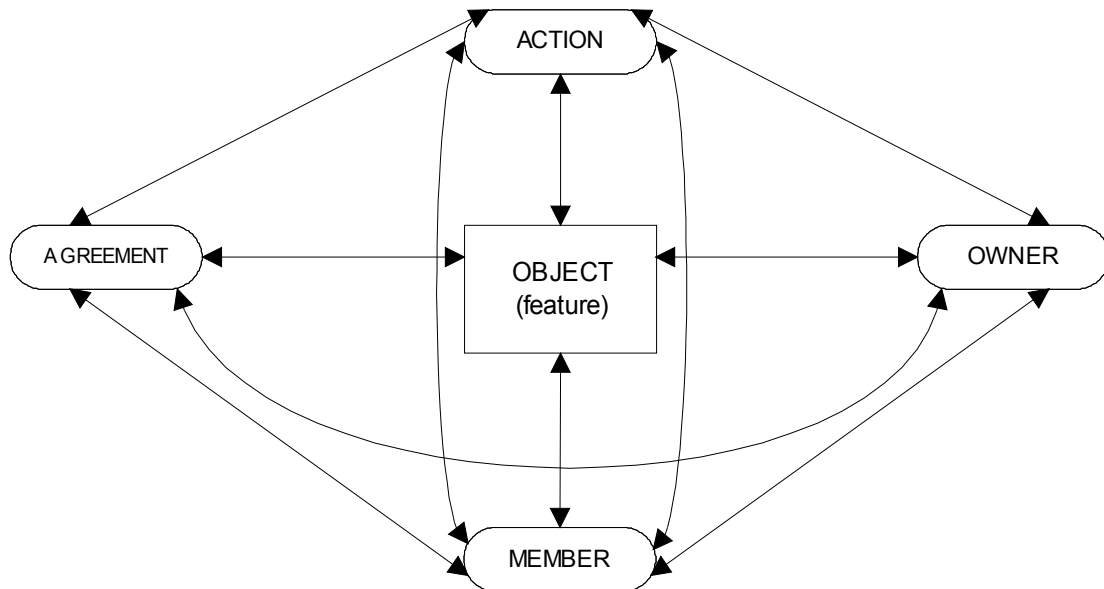
261
 262
 263 [Continues on the next page]



264
265
266
267
268
269
270

Proposal: Possibilities for reorganisations could be assessed when developing different codes for serious usage.

Owner, member or agreement?



271
272
273
274
275
276
277
278
279
280

Here we can note the difference between owners, agreements and members. In reality ownerships agreements and memberships cause very complex networks, and those networks are changing all the time: divisions, mergers, ownership changes, agreement changes, cooperation with other entities, life-cycles, etc.

Question: Can different network codes take care of changes in ownerships, agreements and memberships?

281 **Proposal: There could be some considerations for assessing possible / future changes in**
282 **ownerships, agreements and memberships.**

283
284 **Different requirements for the proposed IT platform**

285
286 In the previous consultations I have advocated following solution as the maximum solution for
287 different information systems:

- 288
289 * public sector institute owns the machinery and processor of the information system
290 * the machinery and processor are based on relevant open standards
291 * the operating system is based on an open-source solution
292 * public sector institute owns the source code of the information system
293 * public sector institute owns the database of the information system
294 * the database is based on open-source solution and on relevant open standards
295 * public sector institute owns all data in the information system.

296
297 **Note: It is possible, that the maximum solution is not implemented for different**
298 **reasons.**

299
300 Here we can note, that the proposed IT platform can be realised with different technologies – some
301 of those technologies are closed and open.

302
303 **Proposal: There could be a more technical and more detailed consultation about the**
304 **technologies of the proposed IT platform.**

305
306 One option is to create a detailed roadmap for different phases of the proposed IT platform. With
307 this roadmap it could be easier to develop the proposed IT platform.

308
309 **Proposal: Detailed roadmap for the proposed IT platform could be created.**

310
311 **Proposal: Detailed roadmap for the proposed IT platform could part of more technical**
312 **and more detailed consultation about the proposed IT platform.**

313
314 **Note: In some consultations I have proposed a roadmap, which could gradually move**
315 **to the previously explicated maximum solution for different information systems**

316
317
318 **Good luck!!!**

319
320 This opinion is quite limited. Hopefully, there are other constructive ideas presented in other
321 opinions. This remains to be seen.

322
323 [Continues on the next page]

324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368

ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the Commission of the European Union. General page to all consultations – both in English and in Finnish: <http://www.jukkarannila.fi/lausunnot.html>

EN: Opinion 1: Review of the rules on access to documents
http://www.jukkarannila.fi/lausunnot.html#nro_1

EN: Opinion 2: Schools for the 21st Century
http://www.jukkarannila.fi/lausunnot.html#nro_2

EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for Safe and Innovative medicines
http://www.jukkarannila.fi/lausunnot.html#nro_3

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
http://www.jukkarannila.fi/lausunnot.html#nro_5

EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
http://www.jukkarannila.fi/lausunnot.html#nro_6

EN: Opinion 8: European Interoperability Framework, version 2, draft
http://www.jukkarannila.fi/lausunnot.html#nro_8

EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS proposal for comments
http://www.jukkarannila.fi/lausunnot.html#nro_9

EN: Opinion 15: Collective Redress
http://www.jukkarannila.fi/lausunnot.html#nro_15

EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
http://www.jukkarannila.fi/lausunnot.html#nro_17

EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
http://www.jukkarannila.fi/lausunnot.html#nro_18

EN: Opinion 19: Official Acknowledgement by the Commission
http://www.jukkarannila.fi/lausunnot.html#nro_19

- 369 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
370 http://www.jukkarannila.fi/lausunnot.html#nro_20
371
- 372 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
373 http://www.jukkarannila.fi/lausunnot.html#nro_21
374
- 375 EN: Opinion 23: Public consultation on the review of the European Standardisation System
376 http://www.jukkarannila.fi/lausunnot.html#nro_23
377
- 378 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
379 http://www.jukkarannila.fi/lausunnot.html#nro_27
380
- 381 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
382 http://www.jukkarannila.fi/lausunnot.html#nro_28
383
- 384 EN: Opinion 30: Internet Filtering
385 http://www.jukkarannila.fi/lausunnot.html#nro_30
386 NOTE: Organised by the European Committee for Standardization (CEN) ⁵
387
- 388 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
389 http://www.jukkarannila.fi/lausunnot.html#nro_32
390
- 391 EN: Opinion 34: REMIT Registration Format
392 http://www.jukkarannila.fi/lausunnot.html#nro_34
393 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁶
394
- 395 EN: Opinion 35: Exploiting the employment potential of the personal and household services
396 http://www.jukkarannila.fi/lausunnot.html#nro_35
397
- 398 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
399 http://www.jukkarannila.fi/lausunnot.html#nro_37
400
- 401 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
402 http://www.jukkarannila.fi/lausunnot.html#nro_39
403
- 404 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
405 http://www.jukkarannila.fi/lausunnot.html#nro_40
406
- 407 EN: Opinion 41: AT.39398: observations on the proposed commitments
408 http://www.jukkarannila.fi/lausunnot.html#nro_41
409
- 410 EN: Opinion 42: Opening up Education
411 http://www.jukkarannila.fi/lausunnot.html#nro_42

5 <http://www.cen.eu/> (Accessed 2 July 2012)

6 <http://www.acer.europa.eu/> (Accessed 2 July 2012)

- 412 EN: Opinion 43: Publication of extracts of the European register of market participants
413 http://www.jukkarannila.fi/lausunnot.html#nro_43
414 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
415
- 416 EN: Opinion 44: Evaluation policy guidelines
417 http://www.jukkarannila.fi/lausunnot.html#nro_44
418
- 419 EN: Opinion 45: About ICT standardisation
420 http://www.jukkarannila.fi/lausunnot.html#nro_45
421
- 422 EN: Opinion 46: Review of the EU copyright rules
423 http://www.jukkarannila.fi/lausunnot.html#nro_46
424
- 425 EN: Opinion 51: European Area of Skills and Qualifications
426 http://www.jukkarannila.fi/lausunnot.html#nro_51
427
- 428 EN: Opinion 52: Trusted Cloud Europe Survey
429 http://www.jukkarannila.fi/lausunnot.html#nro_52
430
- 431 EN: Opinion 53: Trade Reporting User Manual (TRUM) (Draft)
432 http://www.jukkarannila.fi/lausunnot.html#nro_53
433 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
434
- 435 EN: Opinion 55: European Energy Regulation
436 http://www.jukkarannila.fi/lausunnot.html#nro_55
437 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
438
- 439 EN: Opinion 59: Green paper on mobile Health
440 http://www.jukkarannila.fi/lausunnot.html#nro_59
441
- 442 EN: Opinion 60: Cross-border inheritance tax problems within the EU
443 http://www.jukkarannila.fi/lausunnot.html#nro_60
444
- 445 EN: Opinion 61: European Register of Products Containing Nanomaterials
446 http://www.jukkarannila.fi/lausunnot.html#nro_61
447
- 448 EN: Opinion 64: Corporate Social Responsibility - European Commission
449 http://www.jukkarannila.fi/lausunnot.html#nro_64
450
- 451 EN: Opinion 66: Net Innovation for the Work Programme 2016-2017
452 http://www.jukkarannila.fi/lausunnot.html#nro_66
453
454
455 [Continues on the next page]

456

457

458 DISCLAIMERS

459

460 Legal disclaimer:

461 All opinions in this opinion paper are personal opinions and they do not represent opinions of any legal entity I am
462 member either by law or voluntarily. This opinion paper is only intended to trigger thinking and it is not legal advice.

463 This opinion paper does not apply to any past, current or future legal entity. This opinion paper will not cover any of the
464 future changes in this fast-developing area. Any actions made based on this opinion is solely responsibility of respective
465 actor making those actions.

466

467 Political disclaimer:

468 These opinions do not represent opinions of any political party. These opinions are not advices to certain policy and
469 they are only intended to trigger thinking. Any law proposal based on these opinions are sole responsibility of that legal
470 entity making law proposals.

471

472 These opinions are not meant to be extreme-right, moderate-right, extreme-centre ⁷, moderate-centre, extreme-left or
473 moderate-left. They are only opinions of an individual whose overall thinking might or might not contain elements of
474 different sources. These opinions do not reflect past, current or future political situation in the Finnish, European or
475 worldwide politics.

476

477 These opinions are not meant to rally for a candidacy in any public election in any level.

478

479 Content of web pages:

480 This text may or may not refer to web pages. The content of those web pages is not responsibility of author of this
481 document. They are referenced on the date of this document. If referenced web pages are not found after the date when
482 this document is dated, that situation is not responsibility of the author. All changes done in the web pages this
483 document refers are sole responsibility of those organisations and individuals maintaining those web pages. All illegal
484 content found on the referred web pages is not on the responsibility of the author of this document, and producing that
485 kind content is not endorsed by the author of this document.

486

487 Use of broken English

488 This text is in English, but from a person, whose is not a native English-speaking person. Therefore the text may or may
489 not contain bad, odd and broken English, and can contain awkward linguistic solutions.

490

491 COPYRIGHT

492

493 This opinion paper is distributed under Creative Commons licence, to be specific the licence is “Attribution-
494 NonCommercial-NoDerivatives 4.0 International (CC BY-NC-ND 4.0)”. The text of the licence can be obtained from
495 the following web page:

496

<http://creativecommons.org/licenses/by-nc-nd/4.0/>

497

The English explanation is on the following web page:

498

<http://creativecommons.org/licenses/by-nc-nd/4.0/legalcode>

499

500

501



7 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three “old” parties were not traditionally as the three largest parties. The is now a “new” party as the third largest party. We all must remain being interested about this new development in Finland.