

Data management and data format

European Commission proposal	eurelectric ELECTRICITY FOR EUROPE
Articles 23.2 and 23.3 The EC does not recommend any specific data management model at EU level. However, MS have to authorise/certify the party managing data	Electricity Directive 
Article 34 Eligible parties to have non-discriminatory access to data	Electricity Directive 
Articles 23.1 and 23.2 Eligible parties to access data after consumer's explicit consent	Electricity Directive 
Article 24.1 MS have to define at national level a common data format and a transparent procedure for eligible parties to have access to the data	Electricity Directive 
Article 24.2 The EC shall determine - by means of an implementing act - a common European data format together with non-discriminatory and transparent procedures to access the data that will replace the national data format and procedure adopted by MS	Electricity Directive 
Article 24.3 Data access for customers has to be free of charge and Member States are responsible for setting the relevant costs for access to data by eligible parties	Electricity Directive 

No specific data management model should be defined at EU level, only key principles

There is **no 'one size fits all' data management model applicable in all European countries**. Decisions on the **best approach to follow should be taken at national level by NRAs**. However, it is fundamental to **set common principles at EU level** to ensure that data handling is done in a secure, transparent, neutral, non-discriminatory and cost-efficient way.

Provisions on customer consent need to be in line with the EU Data protection regulation

DSOs and suppliers should have access to their customers' metering and consumption data in order to guarantee a secure network management and basic supply services (billing, switching etc.), as per their contractual obligations. For any other additional service, access to metering and consumption data should only be possible after the **explicit consent of the customer**. The General Data Protection Regulation (EU 2016/679) introduces precise rules and obligations on these aspects and we think the Electricity Directive should be aligned.

A common EU Data framework is much more appropriate than a common EU Data format

It is worth recalling that **several Member States have just implemented a national data format and data hub** (e.g. Denmark, Italy) or are about to do it (e.g. Finland, Sweden, Norway, Belgium, France, etc.). **Introducing a new data format would require market actors and DSOs to upgrade all core systems** (such as billing, customer relationship management, etc.) thus creating high costs for the system and for consumers. However, we do think that **there is merit in establishing a set of principles for a common data framework at EU level to facilitate convergence of national data format and procedures**.

Key proposed amendments

Article 23.2

Member States shall organise the management of data in order to ensure **secure, transparent, neutral, non-discriminatory and cost-efficient** data access and exchange. Independently of the data management model applied in each Member State, the party or parties responsible for data management shall, **in accordance with Regulation (EU) 2016/679**, provide to any eligible party with the explicit consent of the final customer, access to the data of the final customer. Eligible parties should have at their disposal in a non-discriminatory manner and simultaneously the requested data. Access to data shall be easy, while relevant procedures shall be made publicly available.

Electricity
Directive

Justification

Whilst we agree that there is no 'one size fits all' data management model applicable in all European countries, it is however fundamental to set common principles at EU level to ensure that data access and exchange is done in a secure, transparent, neutral, non-discriminatory, and cost-efficient way.

DSOs and suppliers should have access to their customers' metering and consumption data in order to guarantee a secure network management and basic supply services (billing, switching etc.), as per their contractual obligations. For any other additional service, access to metering and consumption data should be possible only after the explicit consent of the customer. The General Data Protection Regulation (EU 2016/679) introduces very precise rules and obligations about consumer consent and we think the Electricity Directive should be aligned.

Article 24.2

The Commission, ~~by means of implementing acts adopted in accordance with the advisory procedure referred to in Article 68, shall~~ **may** determine **a set of principles for a common European data framework format to support and** non-discriminatory and transparent ~~procedures for~~ **accessing to** the data, listed under paragraph 1 of Article 23. ~~Such principles European common data format should be taken into account that, will replace national data format and procedure adopted by Member States when developing their national data format and procedure in accordance with paragraph 1. Where it is positively assessed, Member States shall ensure that market participants apply a common European data format.~~

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Directive

Justification

It is worth recalling that several Member States have just implemented a national data hub (e.g. Denmark, Italy) or are about to do it (e.g. Finland, Sweden, Norway, Belgium, France, etc.). Introducing a new data format would require market actors and DSOs to upgrade all core systems (such as billing) thus creating high costs. However we do think there is merit in establishing a set of principles from a common data framework at EU level to facilitate convergence of national data format and procedures.