

## Instrat's open letter to open energy & coal data in Poland

Published on [Instrat's website](http://Instrat's website) and in [WysokieNapiecie.pl](http://WysokieNapiecie.pl)

Tuesday, June 23<sup>rd</sup> 2020

### Addressees:

Government of Poland: Ministry of Climate, Ministry of State Assets, Ministry of Development, Ministry of Digitization  
Statistics Poland, Energy Regulatory Office, Energy Market Agency, Industrial Development Agency  
Polskie Sieci Elektroenergetyczne S.A.  
Polskie Towarzystwo Przesyłu i Rozdziálu Energii Elektrycznej (PTPiREE), Polskie Towarzystwo Elektrociepłowni Zawodowych (PTEZ), Towarzystwo Gospodarcze "Polskie Elektrownie" (TGPE)  
Polish Power Transmission and Distribution Association (PTPiREE), Polish Association of Heat and Power Plants (PTEZ), Polish Power Plants Association (TGPE)  
Mineral and Energy Economy Research Institute of the Polish Academy of Sciences (IGSMiE-PAN), Polish Geological Institute National Research Institute (PIG-PIB), Central Mining Institute (GIG)

### **Call for opening of the energy data to guarantee equal, universal and free access to information about the power market and hard coal sector**

For over 15 years, Poland has been implementing EU reforms aimed at modernising and transforming the national energy sector. However, the ambitious legislation coming from and strategies driven by Brussels usually encounter resistance on the Polish ground. As a result, the implementation is delayed and hampered.

As the just transition in Poland is gaining momentum, it turns out that in the debate on the future of the energy mix, we lack the most fundamental fuel. This absent element is none of the most frequently mentioned technologies - coal, gas, nuclear or RES - but data.

The importance of digitization of public services was demonstrated during the COVID-19 pandemic - it turned out that many basic public services have been successfully digitised. Long-term investments in software and hardware technologies have paid off, but Poland is still at the beginning of this digital transformation.

Yet still, numerous public services remain paper-based or difficult to access for ordinary citizens. One of them is public statistics of the energy and hard coal mining sectors. Unfortunately, the debate about the future of energy mix in Poland is loaded with opinions or simple one-dimensional indicators, which do not meet scientific standards. Why? Public statistics from these sectors is not only generally inaccessible to the public, but hidden behind the paywall. The government and its two contractors responsible for data collection and publication Energy Market Agency (Agencja Rynku Energii S.A.) and Industrial Development Agency (Agencja Rozwoju Przemysłu, Oddział w Katowicach) refuse to provide data on the basis of access to public sector information request.

The current model is fundamentally incompliant with the European Statistical Code and the fundamental premise of the *Clean Energy for All Europeans* package. According to Article 23 of EU Directive 2019/944, data should be made available in a 'non-discriminatory manner' and no 'additional costs for access should be charged to final customers'.

Obtaining only the basic publications financed with taxpayers' money from these institutions is burdened with costs up to several thousand Polish zloty, whereas annual costs of full coverage might reach up to several tens of thousands zloty (EURPLN ~4.4). The data format offered is mostly non-machine readable (PDF files). High costs of obtaining proper data vastly hamper multi-dimensional, in-depth analysis, including evaluation of public policy and reforms.

It is not unusual for public institutions, utilities and scientists to have great difficulties in accessing data on energy and mining sectors. This has a negative impact on the quality of their decisions and conclusions, based on presumptions and rumours instead of transparent studies conducted under scientific rigour.

Particularly now, when Poland faces the challenge of just transition, it is necessary to involve social partners, independent and dispersed investors and research institutions, think-tanks and non-governmental organisations in the process of shaping a modern and transparent energy system that serves us all. This goal can only be successfully achieved if we start with developing a strategy which relies on information symmetry. **It requires equal, universal and free access to data and public statistics in particular.**

The Polish government is well-equipped to achieve this. The Ministry of Digitization is working on the Public Data Opening Programme implemented jointly by other ministries. The data.gov.pl portal serves as an example for a necessary publishing standard and would be a perfect platform for publishing energy sector resources currently unknown to the public, in user-friendly formats and available free of charge. Many institutions, including the Energy Regulatory Office, have already started doing so.

The exceptionality of energy data undoubtedly requires learning from successful foreign projects. Good practices can be found across the network of electricity transmission operators ([entsoe transparency portal](#)), governments of the United Kingdom ([Energy Data Taskforce](#)) and Denmark ([Energi Data Service](#)) or research groups from Germany ([Open Power System Data](#), [Open Energy Platform](#)).

The benefits of such platforms outweigh their financial and organisational costs. The positive effects of opening access and implementation of data publication standards are numerous: boosted entrepreneurship based on innovative business models, higher rank of research teams in European scientific community (e.g. Horizon 2020), higher quality of public policy and data-oriented education of specialists for the needs of the labor market.

Public statistics should neither be subject to copyright laws nor hidden behind the paywall. Once financed with taxpayers' money, resources should be made available for free.

Therefore, Instrat recommends the following to the Polish government with regard to the energy & coal mining sectors:

- (1) to open the access to existing statistical resources held by public administration,
- (2) to conduct public consultation to examine the needs of users - traditional and independent investors, civil society and the research community,

- (3) to develop a strategy for the publication of data from public and private resources according to the guidelines of the Open Data Directive - according to the public data management model,
- (4) to establish a platform for the publication of statistical data in a user-friendly, free of charge and machine-readable format

Instrat has already signaled the problem [in Autumn 2019](#) in an op-ed published by portal WysokieNapiecie.pl. We have hence established free of charge platform [energy.instrat.pl](http://energy.instrat.pl) offering access to aggregated and visualised datasets which we hope to be just a beginning of the debate.

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