

REMIT

**Revision of electronic formats for transaction data,
fundamental data and inside information reporting**

Evaluation of Responses

PC_2017_R_03

18 December 2018

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1 Introduction

The Agency launched a public consultation on the revision of electronic formats for the reporting of transaction data, fundamental data and inside information ([PC 2017 R 03](#)) on 5 October 2017.

The purpose was to invite all interested parties (market participants, registered reporting mechanisms, organised markets and other persons professionally arranging transactions, other reporting parties, etc.) involved in data collection under Regulation (EU) No 1227/2011 (REMIT) to provide their views on the proposed changes to the electronic (XML) formats that are currently used for the reporting of transaction data, fundamental data and inside information to the Agency's REMIT Information System (ARIS) according to Article 10(3) of Commission Implementing Regulation (EU) No 1348/2014 ('Implementing Regulation') empowering the Agency to establish procedures, standards and electronic for reporting of information under REMIT.

On 12 and 13 June 2018 the Agency organised a meeting with the stakeholders that participated in the public consultation in order to discuss the feedback to the proposed revision of electronic formats for transaction data, fundamental data and inside information reporting, as well as new proposals collected during the consultation.

This document summarises the responses received to Annex B (Form for Providing Respondents' Feedback on Proposed Changes) as well as new proposals collected with Annex C (Form for Providing Additional Changes and Comments) of the Consultation Paper. Based on the received input, discussions with National Regulatory Authorities, as well as its own assessment, the Agency will decide whether to:

- update the electronic formats for transaction data, fundamental data and inside information reporting;
- redesign one or several electronic formats for transportation data reporting (Table 3, Table 4) to ARIS.

The purpose of the aforementioned public consultation was to consult relevant parties on material updates of the electronic formats according to Article 10(3) of the Implementing Regulation. Whilst the consultation document also covered updates relating to the addition of newly accepted values for existing available elements/attributes of electronic formats for the sake of completeness, it should be noted that, in the Agency's view, such updates, on their own, are not considered material updates that would require consultation according to Article 10(3) of the Implementing Regulation as it would not impact the reporting parties' ability to report. This is why the Agency reserves its right to add newly accepted values for existing available elements/attributes of electronic formats without public consultation for greater flexibility and to be able to quickly accommodate new energy market developments. The Agency will nevertheless aim at utmost transparency also with regard to such non-material updates of electronic formats and will inform relevant parties about additions of newly accepted values in due time by the available means of communication.

Timeline for the implementation of changes

The Agency plans to implement the relevant changes in Q4 2019 and in 2020. A detailed implementation plan will be provided and communicated to stakeholders in early-2019.

2 Respondents

In total, 41 stakeholders, representing the interests of individual market participants, industry associations, and other stakeholders, responded to the Public Consultation. Figure 1 provides further details on the types of respondents that participated in the Public Consultation (Annex I lists the respondents by their activity and country of origin).

Figure 1. Types of respondents to the Public Consultation

Type	No. of respondents	Having also an RRM role	Having also an OMP role
Industry association	16	4	1
Market Participant	12	4	
Gas TSO	4	4	
RRM/OMP	3	3	3
Inside Information Platform	3	2	2
ENTSOG	1	1	
ENTSO-E	1	1	
NRA	1		
Total	41	19	6

3 Responses received and the Agency’s view

The Agency consulted the stakeholders about potential specific improvements to the electronic formats for the reporting of transaction and fundamental data as well as inside information. The following sections provide an overview and an analysis of the responses that were received. New proposals for changes to the electronic formats that were collected during the Public Consultation are also included.

An overview of the number of responses received, both per each data type and in total, is shown in Figures below.

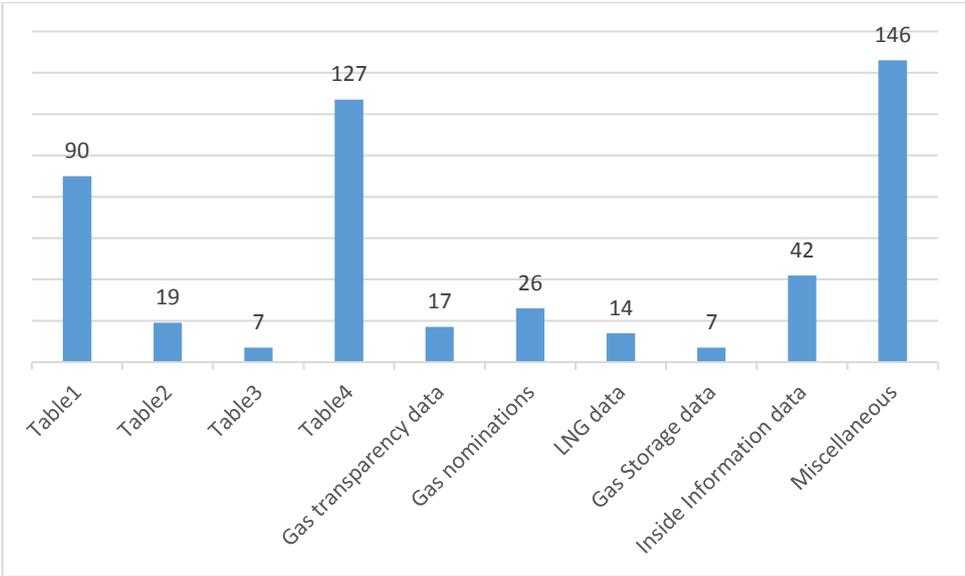
Disclaimer: The summary of responses is not exhaustive and does not attempt to catalogue every comment received, but is rather aimed at providing a general overview of the main messages from the respondents. All non-confidential public responses are available on the ACER website.

Figure 2. Number of responses received

No. of responses received to proposed changes (Annex B)	495*
No. of new proposals received (Annex C)	78
Total No. of responses received	573

* 'out of scope' responses were not counted

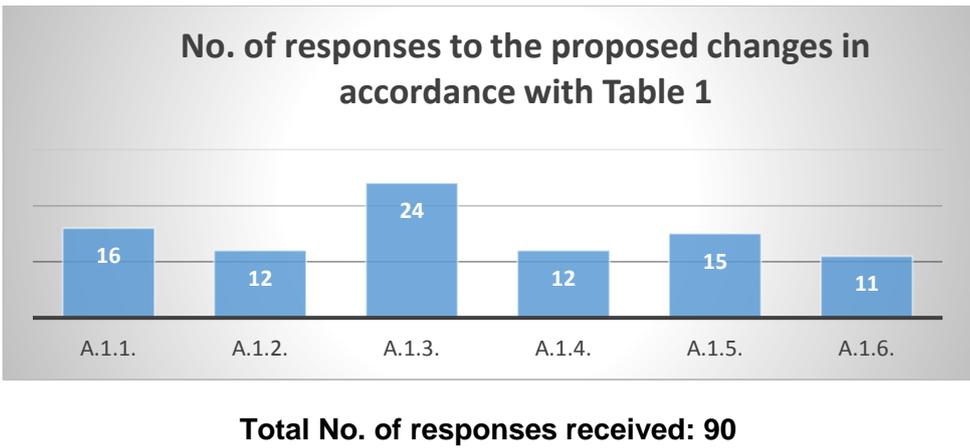
Figure 3. Number of responses per data type



3.1 Proposed changes to the reporting of standard contracts in accordance with Table 1 of the Implementing Regulation

Figure 3 shows the number of responses to the proposed changes related to Table 1.

Figure 3. Total number of responses for the changes proposed for Table 1



Proposed change No. A.1.1

It is proposed to stop reporting with the REMITTable_V1.xsd and REMITTable1_V2.xsd schemas by 31.03.2019 and allow the use of one single schema: REMITTable1_V3.xsd.

Reason for the change

The majority of RRM's are using REMITTable1_V2.xsd. Seventy percent of all Table 1 data was reported using REMITTable1_V2.xsd. The current schemas have some limitations and have to be updated. Thus, any approved change of REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas will be implemented within **REMITTable1_V3.xsd**

Respondents' feedback

No. of respondents: 16

The majority of respondents agreed with the proposal to unify the schemas and report only under REMITTable1_V3.xsd. Respondents pointed out that, in order to facilitate the management of the lifecycle events, V3 should be used for new trades, but that the use of the old version should also be allowed for the modification of outstanding deals.

Some respondents emphasised their need to be able to correct, after the cut-off date, those files that were initially reported before the cut-off date in the v2 schema. They supported the idea that this correction should be possible by following, in general, the same procedure that is currently

accepted by the Agency, i.e. by resubmitting the same file in the same (v2) format but with 'E' in the Action Type field, after which the corrected version in v3 format can be submitted.

One respondent, while not opposing the proposal, expressed concern about the timing of the implementation, given that 31 March 2019 coincides with a peculiar period of the year which requires IS and business resources to be dedicated to commercial activities: it is the end of the gas winter season and, in 2019, will also be the date for clock change. For pure practical reasons, the respondent suggested either to delay or to advance the changes to mid-April or mid-March, respectively. Furthermore, another respondent proposed that the timing of the change is synchronised with proposal A1.2 so that market participants can update their systems efficiently. Nevertheless, appropriate level of detail also has to be provided to the market participants on how to handle the change to a new version of the schema as it may affect previously submitted data.

One respondent also suggested that organised market places and market participants get at least three months' notice if the change is eventually implemented.

The Agency's view:

The Agency will consider implementing the REMITTable1_V3.xsd schema. The Agency will also consider adjusting the timing of the implementation and will clarify in its guidance the simultaneous use of the current and the new schemas for Table 1 during the transition period.

The Agency will try to avoid the simultaneous use of more than two schemas per datatype. This means that version 1 of the schema for REMIT Table 1 will be discontinued before version 3 is enabled.

Additional changes proposed (Annex C):

Regarding Table 2, three (3) respondents underlined, with particular reference to the proposal A.1.1, that also for Table 2 it should be maintained the possibility for the market participants to report lifecycle events using the previous version of the format.

Two (2) respondents considered it important to recommend that, following the official announcement of the decided modifications, the market should be given at least 12 months to implement any schema changes. Moreover, this 12-month period will also allow the affected parties (market participants and reporting entities) to properly plan and allocate resources in order to enable a smooth implementation of the required changes in the relevant systems which support REMIT processes.

Several suggestions were made by the same respondent:

- to issue clear guidance on the terms of validity of the currently used schemas;
- to define rules that have to be followed during the "transition period" (of simultaneous usage of the current and the new schemas) for update/modification/cancellation of reports submitted to ARIS before the date of Go-life of the new schemas with the currently used ("old") schemas;

- to define rules that have to be followed after the “transition period” (of simultaneous usage of the current and the new schemas) for update/modification/cancellation of reports submitted to ARIS before the date of Go-life of the new schemas with the currently used (“old”) schemas;
- to update accordingly all documents (ACER REMIT TRUM, MOP, FAQs, Q&A, Guidances, XML samples and etc.) with information relevant to the new or modified schema(s) and schema elements, and the rules and requirements for their use;
- to update accordingly all documents (ACER REMIT TRUM, MOP, FAQs, Q&A, Guidances and etc.) with information relevant to the validity and applicability of the currently suggested and used workarounds for issues that would be resolved through the modified schemas (e.g.: the use of arbitrary values for some mandatory fields, etc.).

The Agency’s view:

The guidance and any other documentation related to the schema changes will be updated in due time. The Agency will also allow adequate time for the implementation process and will clarify in its guidance the simultaneous use of the current and the new schemas for Table 2 during the transition period.

Proposed change No. A.1.2

It is proposed that Data Field No (35) Price and Data Field No (40) Quantity of Table 1 of REMIT Implementing Regulation are reportable within the “*price time interval section*” of REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas instead of their own field.

Currently Data Field No (35) Price and Data Field No (40) Quantity of Table 1 of REMIT Implementing Regulation are reportable with REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas through:

Field No (35) Price:

- REMITTable1 >TradeList>TradeReport>priceDetails>price
 - REMITTable1 >OrderList>OrderReport>priceDetails>price
- and

Data Field No (40) Quantity:

- REMITTable1 >OrderList>OrderReport>quantity> value
- REMITTable1 >TradeList>TradeReport> quantity>value

However, when a contract has different prices for each time interval, then Field (57)

“*Price/time interval quantity*” applies:

- REMITTable1 >OrderList>OrderReport>priceIntervalQuantityDetails>priceTimeIntervalQuantity>value
- REMITTable1 >TradeList>OTradeReport>priceIntervalQuantityDetails>priceTimeIntervalQuantity>value

Reason for the change

The simplification of the schema. Reporting entities will not be able to report price and quantity in one or the other section, as this creates inconsistencies in data reporting. This change would therefore enhance data quality for monitoring purposes.

Respondents' feedback

No. of respondents: 12

The majority of the respondents supported the proposal for the simplification of the schema to prevent inconsistencies in data reporting with regard to the reporting of 'Price' and 'Quantity'.

One respondent suggested to update the TRUM document accordingly and provide clear guidance on the new requirements and properties of the affected fields.

Another respondent, despite their positive reaction to the change, argued that the name of the element <priceIntervalQuantityDetails> used in the public consultation document does not match the element name <intervalPriceAndQuantityDetails> in the provided schema file.

A few respondents were not in favour of the change, as it will influence all existing reporting scenarios of the standard contracts, which were successfully tested a few years ago. The current reporting format using Fields price (35), quantity (40), load delivery intervals (54), delivery capacity (55) and price/time interval quantity (57) takes into account the flexibility and diversification of the transactions processed by organised market places.

Another respondent claimed that this proposal is a big change for all venues that do not report Price Interval. The majority of Contracts are standard – they assume the Price interval applies to market participants reporting bilateral contracts directly with delivery/price schedules (?). The respondent therefore does not support the change.

The Agency's view:

The Agency appreciates that the majority of respondents supported the proposal. The Agency will consider implementing the change.

Proposed change No. A.1.3

It is proposed that the UTI format is harmonized with the one used under EMIR, taking into consideration the UTI length and allowed characters.

Currently the REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas allow for the following UTI format:

```
<xs:simpleType name="uniqueTransactionIdentifierType">
  <xs:restriction base="xs:string">
    <xs:maxLength value="100"/>
    <xs:pattern value="[A-Za-z0-9_-] +"/>
  </xs:restriction>
</xs:simpleType>
```

If harmonised with EMIR, the new UTI format would be:

```
<xs:simpleType name="ACERuniqueTransactionIdentifierType ">
  <xs:restriction base="xs:string">
    <xs:pattern value="[A-Z0-9]{1}[A-Z0-9:\.-_]{0,50}[A-Z0-9]{1}[A-Z0-9]{1,52}"/>
  </xs:restriction>
</xs:simpleType>
```

A string of up to 10 capital letters (A-Z), numbers (0-9) or special characters ":", ".", "-", "_". Special characters not allowed at the beginning and at the end.

However, given that the current UTI format length is 100 characters and allows small letters, the question is whether there is a desire for such a change among the stakeholders and whether they would like to shorten the UTI length from 100 to 52 (and allow capital letters only) or keep the UTI format as it currently is and not make any changes to the current REMIT reporting

Reason for the change

To allow reporting parties to report their trade data under REMIT with the same UTI format of data reported under EMIR.

Respondents' feedback

No. of respondents: 24

The majority of the respondents were not in favour of harmonising the UTI format with the one used under EMIR, taking into consideration the UTI length and allowed characters. One of the reasons was that this change would have cost implications for market participants. Moreover, this change would induce a lot of administrative work (update of existing contracts, coordination), possibility for potential failure in UTI generation, and changes in the implementation.

Another respondent stated that a consequence of this change would be that all current UTIs would have to be redefined and synchronised with the contract parties, which is unnecessarily burdensome for market participants.

Some of the respondents disagreed with the proposal to reduce the maximum length of the field from 100 to 52 character and proposed a UTI that only allows capital letters, as this could simplify the sharing of the code between counterparts. In addition, they suggested to include ':' and '.' in the list of allowed characters.

A few respondents agreed with the proposal to shorten the UTI length to 52 characters and, when using letters, to allow only capital letters. Additionally, they considered it positive to include additional characters, such as '\.', as long as they are used in the correct positions.

The Agency's view:

The Agency was asked to propose a way to harmonise the UTI format with the one used under EMIR, taking into consideration the UTI length and allowed characters. However, according to the feedback received during the public consultation, the Agency takes due note that the majority of respondents prefer not to change it. The Agency will nevertheless aim at further exploring ways of harmonisation for reporting under REMIT and EMIR with the European Securities and Markets Authority (ESMA). The Agency believes it would be reasonable to remove the space character and include '\.' in the allowed characters, and will therefore consider including these suggestions in the schema change.

Proposed change No. A.1.4

It is proposed that the element "Index value", which is currently present within the contract section of the schema, is deleted.

Reason for the change

No contract has an Index Value at the time of reporting. If that were the case, then the value should be reported in the price field.

Respondents' feedback

No. of respondents: 12

Six (6) respondents directly agreed with the proposal.

In addition many respondents stated that the possibility to report the so-called simple index trade using Table 1 should be maintained. For this reason, Field 36 'Index value' should be maintained to report the difference (+/-) from the fixing index value. One respondent highlighted that the proposal is not correctly implemented in the XML schema.

One (1) respondent believes that this decision should be complemented with a detailed description of how to report spreads on indices. Both the field to be used ('Price'?) and examples are expected to clarify this.

One (1) respondent said that they are currently reporting trade spreads (Index and Spread) in this field, as stated by TRUM. It should be clarified where to detail this value if this field is deleted.

One respondent (1) is indifferent and one (1) is not concerned by this proposal.

Two (2) respondents said that Field 'index value' should not be deleted from the schema. The current option is preferable.

The Agency's view:

The Agency welcomes that the change is supported by the majority of respondents and will consider it for implementation.

Proposed change No. A.1.5

It is proposed to change the cardinality of Field no (41) "Total notional contract quantity" in REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas from optional to mandatory.

Although some contracts may not have a "Total notional contract quantity" value, i.e. index trades, this field can be reported with a mock value e.g. 9999999.9999.

Reason for the change

To prevent instances of reporting parties failing to report the "Total notional contract quantity". The amendment of the schema in such a way that reporting entities will not have the option to choose whether or not to report "Total notional contract quantity", as this creates inconsistencies in data reporting. This change would therefore enhance data quality for monitoring purposes.

Respondents' feedback

No. of respondents: 15

The majority of the respondents were not in favour of changing the cardinality of Field (41) 'Total notional contract quantity' in REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas from optional to mandatory.

Some of the respondents were concerned that the use of mock values does not seem to respect certain standards of professionalism. Moreover, they encouraged to avoid the use of mock values, as this may eventually lead to confusion and the submission of incomplete information.

One (1) respondent pointed out that arbitrary/mock values should be used only as a workaround with the aim to avoid schema modifications. They considered it reasonable to introduce changes

and solutions that as from their establishment would impose reporting limitations and would require workarounds. Thus, they proposed the use of a different arbitrary value for the cases when the 'Total notional contract quantity' cannot be defined. As 9999999.9999 is a realistic one that could happen in practice, the respondent suggested a minimal value allowed by the schema: 0.00001.

The Agency's view:

The majority of respondents were not in favour of changing the cardinality of Field No (41) 'Total notional contract quantity' within the schema. However, since reporting parties have failed to report 'Total notional contract quantity' on so many occasions, it is imperative to find a solution for this issue in order to improve data quality. As index trades are not relevant and there is no need to have mock values, there is no reason not to make the field mandatory. As a result, the Agency will consider implementing the change.

Proposed change No. A.1.6

It is proposed that Data Field No (52) "Load type" of REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas changes from optional to mandatory.

Reason for the change

Reporting entities will not have an option to report Data Field No (52) "Load type" or not, as this creates inconsistencies in their data reporting and affects the data quality performance of reporting parties.

Respondents' feedback

No. of respondents: 12

Six respondents (6) welcomed the proposal. For four respondents (4) the current option is preferable, while two (2) respondents were indifferent to the proposal.

One (1) of the respondents, who was in favour of the change, proposed that the change should be applied to the new and modify events with no retroactive effect.

Two (2) of the respondents did not support changing the field from optional to mandatory, as in some cases it is difficult to map the delivery profile to one of the allowed values creating the potential risk that a lot of reports will have the value of "OT" in this field that does not add any information to the delivery profile. Moreover, one of the respondent added that the modification will impose obstructions which could hamper the reporting process by making the data submission/reporting impossible in case of missing data.

One (1) of the respondents proposed to remove the field, as it is just meant to summarise what is described in the delivery profile and does not add any new information.

If the change is to be implemented, a few respondents suggested to update the TRUM document accordingly and provide clear guidance on how the field should be populated when the load type

is not specified in the contract, and more specifically in case of bilateral trades where the load type is not defined in the contract.

The Agency's view:

The Agency will not consider implementing the change and will consider updating the TRUM instead.

Additional changes proposed (Annex C):

Regarding Table 1 & 2 - Price currency (Field 37 in Table 1 and 17 in Table 2), a respondent pointed out that in order to represent the quantities and prices as stated in the contract, it would be useful to have a unit of measurement for quantity (e.g. kWh) as well as a separate unit of measurement to indicate that the price is expressed in €/MWh, for example. The reason is that the operators now sometimes have to convert the contractual figures.

The Agency's view:

The Agency is of the opinion that this proposal would not bring any additional value because all the units for price and quantity/volume are already included in the schema. The Agency will not consider implementing the change.

Additional changes proposed (Annex C):

A respondent proposed to change Field (38) Notional amount in the schemas from optional to mandatory, as proposed for Field (41), Total Notional Contract Quantity. In the 'Open letter on REMIT transaction reporting data quality' the Agency stated that 'all trades reported should contain both values, apart from some exceptions specified in the Agency's guidance on transaction reporting. It is not sufficient to report one of the two values only'. Therefore, Field 38 should follow the same criteria.

In addition, the description of Field (38) in the TRUM should change to fit with those contracts with a different price and volume in each period: $\text{Sum (from } i = 1 \text{ to the number of periods of the contract) (price}_i \times \text{volume}_i)$. The formula in the TRUM is only valid for contracts that have same price and volume over all the periods.

The description of Field (41) in the TRUM should change to fit with those contracts with a different volume in each period: $\text{Sum (from } i = 1 \text{ to the number of periods of the contract) (volume}_i)$. The formula in the TRUM is only valid for contracts that have same price and volume over all the periods.

The Agency's view:

The proposal to make Field (38) 'Notional amount' mandatory suggests that all contracts have a price, however this is not the case for Index trades, i.e. trades that have no price until the time of the trade. The Agency will not make the field mandatory, but will introduce a validation rule to enforce the reporting of the field.

Additional changes proposed (Annex C):

For Table1, Table2 - TRUM Data Field No (44, 52) loadType, one (1) of the respondents suggested to reduce the given enumeration and delete value 'GD' from the list. The reason behind this is that there is some confusion about the correct selection of the loadType linked to gas transactions. There is no difference between Baseload and GasDay, so Commodity = NG and loadType = BL would also reflect a constant delivery across the day. Additional gas gets also delivered using a schedule so Commodity = NG and loadType = SH would reflect this scenario but in case that loadType = BL is just linked to Commodity = EL, it looks like that SH is also just linked to Commodity = EL.

The Agency's view:

In the Agency's view, the gas and electricity industries have different terminologies for gas and electricity products, which is why there is no need to change the enumeration for the load type. The Agency will not consider implementing the change.

Additional changes proposed (Annex C):

A respondent suggested the following changes for the fields:

- Contract Name, (ait1:REMITTable1/ait1:contractList/ait1:contract/ait1:contractName and ait1:REMITTable1/ait1:OrderList/ait1:OrderReport/ait1:contractInfo/ait1:contract/ait1:contractName) and other occurrences replace workarounds via field "contractName"
"EXECUTION" => insert explicit flag in TradeReport element
"BILCONTRACT" = already defined by value in field "organizedMarketPlace"
- Duration should be removed ait1:REMITTable1/ait1:contractList/ait1:contract/ait1:duration). The reason behind this change is to avoid confusion, as per the guidance and the examples there is no scenario that requires this field.
- Execution time (ait1:REMITTable1/ait1:TradeList/ait1:TradeReport/ait1:executionTime) is clarified, specifically the usage of executionTimestamp field. The field should be removed if not used. As per the TRUM the field TransactionTimestamp is used to reflect the execution time. There is no need for a separate field. The TransactionTimestamp of the New Action is equal to the execution time and there is no need to copy this timestamp into the field executionTimestamp of subsequent lifecycle reports as this value was already reported with the New record. So it only creates issues but contains no additional information that was not already reported.
- Termination Date (ait1:REMITTable1/ait1:TradeList/ait1:TradeReport/ait1:terminationDate) should be changed from dateTime to date type. As per TRUM this is a 10 character date only field and this should also be reflected in the schema.

The Agency's view:

The Agency does not see any benefits to the first proposal.

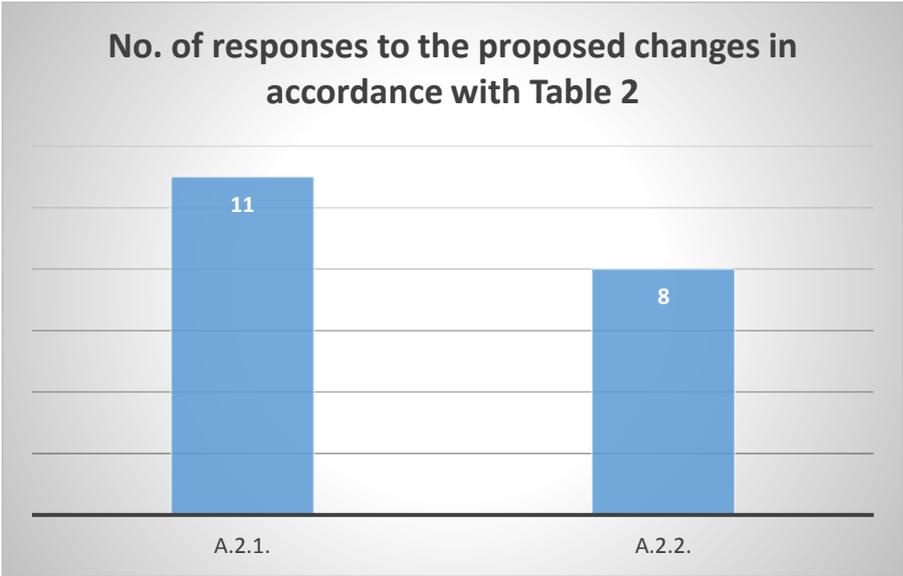
With regard to 'Duration', the Agency will not consider removing the field, since it is part of the Implementing Regulation. As the TRUM and examples in Annex II of the TRUM do not currently consider the use of this field (but do not exclude that it might be used in the future), reporting parties can skip it.

With regard to 'executionTime', there is a specific reason for the inclusion of this field. The reason, which is explained in more detail in the FAQs document on transaction reporting, is that this field may be used by brokers to differentiate between the execution time and transaction time. All other reporting parties can ignore it.

3.2. Proposed changes to the reporting of non-standard contracts in accordance with Table 2 of the Implementing Regulation

Figure 4 shows the number of responses to the proposed changes related to Table 2

Figure 4. Total number of responses to the changes proposed for Table 2



Total No. of responses received: 19

Proposed change No. A.2.1

It is proposed to change the cardinality of Data Field No (32) "Option style" and Field No (33) "Option type" from optional to mandatory, if Field No (13) "Contract type" contains one of the following values: OP, OP_FW, OP_FU or OP_SW.

Some elements within the schema were left optional in order to allow for exceptions and flexibility. However, when a contract has some optionality embedded in it, "Option style" and "Option type" should be filled in.

Reason for the change

To prevent instances of reporting parties failing to report the Data Field No (32) Option style and Data Field No (33) Option type. If the contract includes an option, then both fields have to be filled in.

The amendment of the schema will prevent reporting entities from leaving these fields empty, as this creates inconsistencies in data reporting and affects the data quality performance of reporting parties.

Respondents' feedback

No. of respondents: 11

The majority of the responses were in favour of the proposal to change the cardinality of Data Field No (32) 'Option style' and Field No (33) 'Option type' from optional to mandatory, if Field No (13) 'Contact type' contains one of the following values: OP, OP_FW, OP_FU or OP_SW.

The Agency's view:

The Agency notes that a large majority of responses were in favour of the proposal to change the cardinality of Data Field No (32) 'Option style' and Field No (33) 'Option type' from optional to mandatory if Field No (13) 'Contact type' contains one of the following values: OP, OP_FW, OP_FU or OP_SW and will consider implementing the change.

Proposed change No. A.2.2

It is proposed that Data Field No (44) "Load type" of Table 2 of REMIT Implementing Regulation changes from optional to mandatory.

Reason for the change

Reporting entities will not have an option to report Data Field No (44) "Load type" or not, as this creates inconsistencies in their data reporting and affects the data quality performance of reporting parties.

Respondents' feedback

No. of respondents: 8

Most of the respondents were in favour of the change to make the Data Field No (44) 'Load type' of Table 2 mandatory.

One (1) of the respondents stated that the element 'datetime' should be further developed in such a way that some validation rules are implemented. If load type is baseload, then it should be made sure that the difference between the reported deliveryEndDate and deliveryStartDate equals at least one day. Furthermore, the respondent suggested that checks should also be done on loadDeliveryStartTime and loadDeliveryEndTime, in such a way that those are in line with the load type reported. Those checks should also be done for Table 1 of REMIT Implementing Regulation.

Another respondent proposed that it should be taken into account that 'other' will be reported when this value is not known.

The Agency's view:

In order to maintain consistency with Table 1, the Agency will not introduce the change.

Additional changes proposed (Annex C):

A respondent suggested to add a New field – Transaction Time – as in Table1 (ait1:REMITTable1/ait1:TradeList/ait1:TradeReport/ait1:transactionTime). The reason is that for Table2 there is no field that would specify when a lifecycle event happened, like there is in Table1. To apply the same logic to reports, no matter if Table1 or Table2, it would be good to add a field that tells when a lifecycle event happened. This would make the history of a Table2 more visible and in line with the information sent for Table1.

The Agency's view:

The 'Contract date' field in Table 2 is used to specify the date of a lifecycle event. The Agency will not consider implementing the change.

Additional changes proposed (Annex C):

Regarding the TRUM Data Field No (15) Price or price formula and TRUM Data Field No (25) Fixing index from Table2, one of the suggestions proposed by a respondent was to allow the use of a space character. Furthermore, the respondent suggested to allow the use of a special character ',' (or '.') for the reporting of Data field (25) Fixing index.

Another proposal was to introduce an identifier which would make it possible to divide different price formulas reportable within the Data Field No (15) Price or price formula, for instance by approving the use of character ';' as a separator.

To make the reporting of price conditions more convenient, the same respondent suggested to introduce an additional field, placed within the TRUM section "Fixing index details", schema section Details for the index, for the separation of data on the abbreviation of price quotation in the formula and its description. At the moment, all data is reported in Data Field No (25) Fixing index.

The above proposals are determined by the complexity of price formulas used in long-term contracts. The proposed changes will make the reporting of price conditions more convenient.

The Agency's view:

The fields TRUM Data Field No (15) 'Price or price formula' and TRUM Data Field No (25) 'Fixing index' in Table 2 are strings. The proposals (to allow the use of special characters, including the space character) are therefore already covered within the existing schema.

Additional changes proposed (Annex C):

One respondent suggested to introduce into Table2 schema a new field: 'additionalContractIDinfo;', which would allow the submission of a temporary Contract ID, and, once the appropriate Contract ID is received from the counterparty, the modification of a previous report by recalling the old Contract ID.

This solution would be particularly helpful in cases where the counterparty provides the Contract ID T+30 or indeed not at all and they have not agreed to use the ACER algorithm. This solution is already implemented in Table 1 schema.

In Table1 schema, there is a field additionalUtilInfo, which allows, according to Question II.3.1.17 (FAQ) to submit a temporary UTI, and then once the appropriate UTI received from the counterparty to modify the previous report recalling the old UTI.

The Agency’s view:

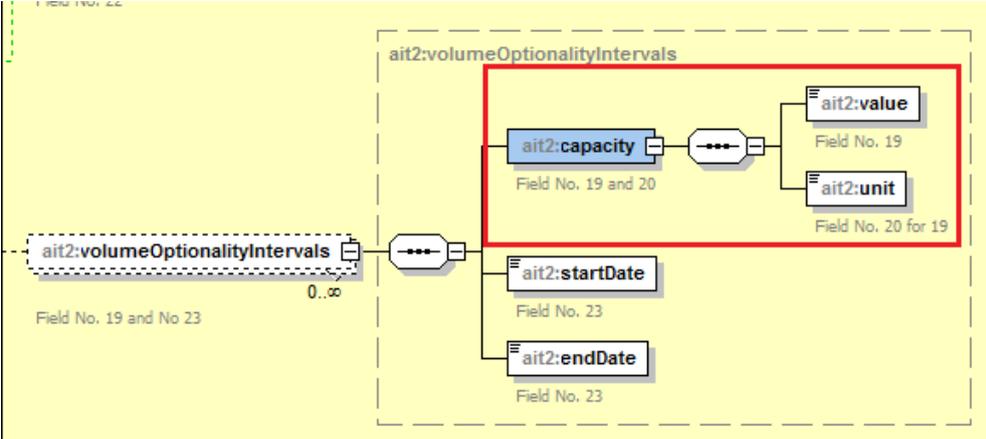
The Agency has provided guidance and the means of generating identifiers. It is incumbent on Market Participants to comply with REMIT. The Agency will not consider implementing the change.

3.2.1 Change proposed and included in the XSD schema for which description was missing in Annex A.

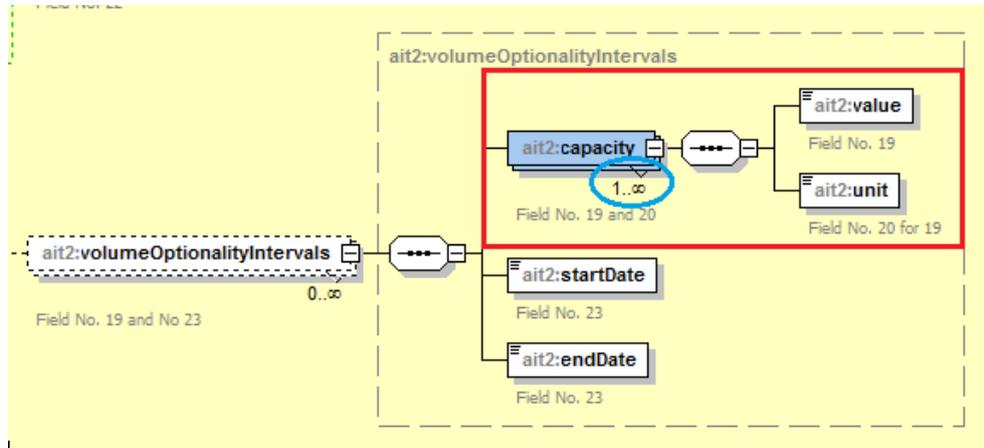
Proposed change No. A.2.3

Currently the Data Field N. (19) “Volume optionality capacity” of Table 2 and its unit reported through:

- REMITTable2>TradeList>nonStandardContractReport>volumeOptionalityIntervals>capacity>value ; and
- REMITTable2 >TradeList>nonStandardContractReport>volumeOptionalityIntervals>capacity>unit



It is proposed that Field No (19) Volume optionality capacity and its unit, “capacity>value” and “capacity>unit”, become a repeatable element of the schema to allow the reporting of different optionality intervals/ranges.



Reason for the change

Currently when multiple values of capacity have to be reported, e.g. 0 /100 (0 to 100 range) or 0, 100/200 (0 or 100 to 200 range) then the xml code has to be reported as many time as the number of capacity values).

Indicating a 0 or 100-200 range can be complicated:

```

<volumeOptionalityIntervals>
  <capacity>
    <value>0</value>
    <unit>KMW</unit>
  </capacity>
  <startDate>2015-08-01</startDate>
  <endDate>2025-07-31</endDate>
</volumeOptionalityIntervals>

<volumeOptionalityIntervals>
  <capacity>
    <value>100</value>
    <unit>KMW</unit>
  </capacity>
  <startDate>2015-08-01</startDate>
  <endDate>2025-07-31</endDate>
</volumeOptionalityIntervals>

<volumeOptionalityIntervals>
  <capacity>
    <value>200</value>
    <unit>KMW</unit>
  </capacity>
  <startDate>2015-08-01</startDate>
  <endDate>2025-07-31</endDate>
</volumeOptionalityIntervals>

```

Given that start and end date are mandatory fields when a capacity value is reported in the xml file and, if for some reasons, Start and Date is not applicable to the capacity value, then 1900-01-01 should be used to indicate that no optimality intervals are available:

```
<startDate>1900-01-01</startDate>  
<endDate>1900-01-01</endDate>
```

Alternatively, the start and end dates, fields No. (42) and (43) period can be used.

With the proposed modification, reporting parties will not face this issue.

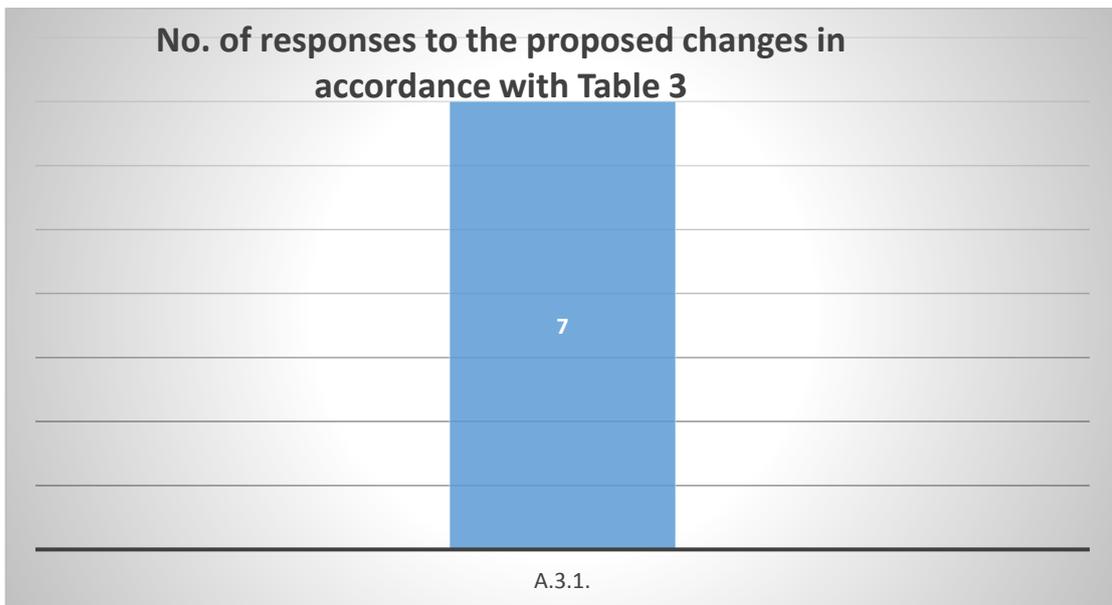
The Agency's view:

The Agency discussed the proposal with stakeholders during the meeting on 12 June and, in the light of the positive feedback received, will consider implementing the change.

3.3. Proposed changes to the reporting of electricity transportation contracts in accordance with Table 3 of the Implementing Regulation

Figure 5 shows the number of responses to the proposed change related to Table 3

Figure 5. Total number of responses to the changes in Table 3



Total No. of responses received: 7

Proposed change No. A.3.1

It is proposed to simplify the reporting of electricity transportation contracts data with a new schema based on the technical standards of Table 1 and Table 2 schemas:

REMITTable1_V1.xsd/REMITTable1_V2.xsd and REMITTable2_V1.xsd.

The new schema will be fully in line with the data fields, defined in Table 3 of the REMIT Implementing Regulation (see Annex D_ XML SCHEMA FOR ELECTRICITY TRANSPORTATION CONTRACTS).

Reason for the change

The schema that is currently used for the reporting of electricity transportation contracts consists of six different “xsd” files and has several mandatory fields that do not need to be reported according to Table 3 of REMIT Implementing Regulation. This obliges market participants to report data that is not listed in Table 3.

The proposed schema will allow market participants to report data only as required by the Regulation.

In addition, the proposed schema would have the same technical standards of Table 1,2 and 4 (e.g. a single file), which will harmonise the reporting of all the different types of transaction data.

Respondents' feedback

No. of respondents: 7

The majority did not support the proposal to simplify the reporting of electricity transportation contracts data with a new schema. One of the reasons was that this simplification implies changes to an existing well working exchange of data based on existing industry standards. Thus, the change will bring not only risks in terms of implementation but also implies costs for all entities for making changes to existing systems.

Nevertheless, one (1) of the respondents pointed out that if the replacement of the currently used schema is approved during the consultation process, there is a chance that later, at the implementation stage, some unexpected and/or undetected issues (e.g. not appropriate field cardinality, not appropriate field properties – type, length and etc.) to hamper the reporting process. This could invoke unneeded complications and additional discussions between ACER and the affected parties for workaround solutions, application of fake mock values and etc., and could lead to new round of public consultations for approval of the consequential improvements of the new schema.

One (1) of the respondents recommended that this change is put in place in order to use existing international (IEC, CENELEC) formats. If the latter require amendments, requests should be sent accordingly to the appropriate competent bodies.

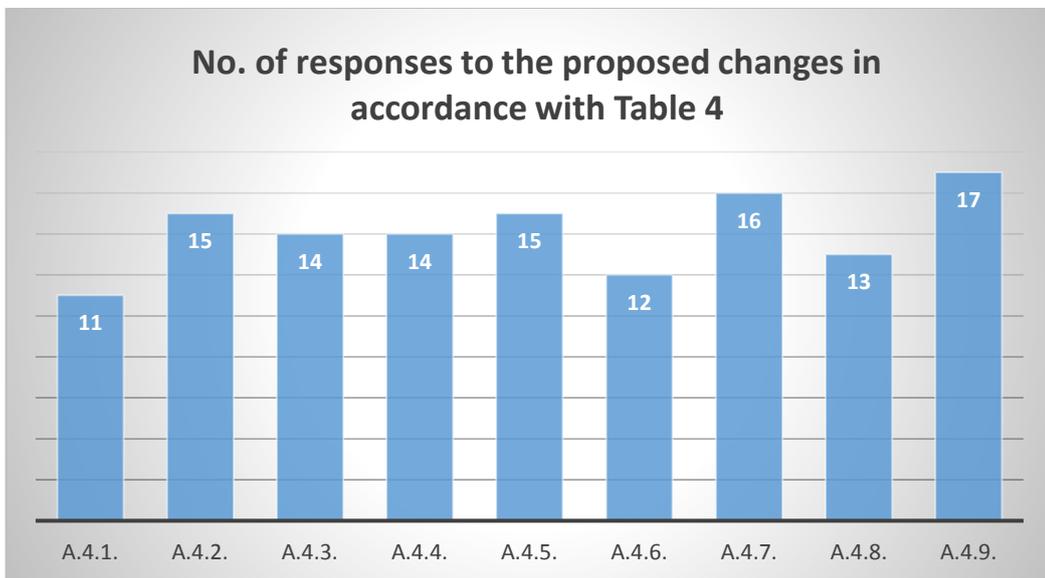
The Agency's view:

As almost none of respondents supported the proposal, the Agency will not consider implementing the change. However, the allowed codes for identifying parties may be extended to also include an ACER code, in line with Article 10 of the Implementing Regulation.

3.4. Proposed changes to the reporting of gas transportation contracts in accordance with Table 4 of the Implementing Regulation

Figure 6 shows the number of responses to the proposed changes related to Table 4

Figure 6. Total number of responses to the proposed changes for Table 4



Total No. of responses received: 127

Proposed change No. A.4.1

It is proposed to simplify the reporting of gas transportation contracts data with a new schema based on the technical standards of Table 1 and Table 2 schemas: REMITTable1_V1.xsd/REMITTable1_V2.xsd and REMITTable2_V1.xsd. The new schema will be fully in line with the data fields, defined in Table 4 of the REMIT Implementing Regulation (see Annex D_ XML SCHEMA FOR GAS TRANSPORTATION CONTRACTS).

Reason for the change

The schema that is currently used for the reporting of gas transportation contracts consists of five different “xsd” files and has several mandatory fields that do not need to be reported

according to Table 4 of REMIT Implementing Regulation. This obliges market participants to report data that is not listed in Table 4.

The proposed schema will allow market participants to report data only as required by the Regulation.

In addition, the proposed schema would have the same technical standards of Table 1, 2 and 3 (e.g. a single file), which will harmonise the reporting of all the different types of transaction data.

Respondents' feedback

No. of respondents: 11

The majority of the respondents did not agree with the simplification of the schema used for the reporting of gas transportation contracts. They argued that to completely discard the existing five Edigas schemas and replace them with a new schema is a big change and would require massive workload and cost intensive IT projects from ALL RRM reporting table 4 data, potentially also from the TSOs acting as Market Participants and supplying data to a 3rd party RRM.

Furthermore, the changes of these systems and processes would incur additional costs and will achieve limited benefits. Moreover, the current reporting process is fully automated and new schemas may require manual error-prone transfer of data.

Most of the respondents advised that maintaining the old schema will ensure compatibility with the regulations as well as the TRUM and will not require the market to implement a new schema with the unnecessary added cost of implementation.

One (1) of the respondents recommended different options to fulfil the needs without changing the schema:

- The codes can be restricted as required via a code list.
- The mandatory fields can be changed to dependent, if required.

The Agency's view:

As almost none of the respondents supported the proposal, the Agency will not consider implementing the change. However, the allowed codes for identifying parties may be extended to also include an ACER code, in line with Article 10 of the Implementing Regulation.

Additional changes proposed (Annex C):

One (1) of the respondents stated that for TRUM - Chapter 7 introduction, the phrase 'the description of accepted values only contains examples of values' should be removed, while all the accepted coded values should be included in the tables. Moreover, as it is the only place where this sentence appears, without a clear specification of which values are acceptable, it is not

possible to clearly identify the codes that should be used. No reference is made to the Edigas Implementation Guide consequently any value can be indifferently used.

The Agency's view:

The TRUM clearly refers to the Edigas Code list and the Edigas implementation guide.

Proposed change No. A.4.2

It is proposed to allow the same currencies in Data field No (17) Currency as in non-standard contracts (Table 2):

BGN=Bulgarian lev

CHF=Swiss franc

CZK=Czech koruna

DKK=Danish krone

EUR=Euro

EUX=Euro cent

GBX=Penny sterling

GBP=Pound sterling

HRK=Croatian kuna

HUF=Hungarian forint

ISK=Icelandic króna

LTL=Lithuanian litas

NOK=Norwegian krone

PCT=Percentage

PLN=Polish złoty

RON=Romanian new leu

SEK=Swedish krona/kronor

USD=U.S. dollar

Reason for the change

The only allowed currency at the moment is Euro. Currently, nine EU Member States are not part of the Euro-Zone - where the national currency is Euro. The denomination of tariffs / prices for capacity products of the TSOs from those countries, as allowed by the national laws, are in local currencies. The transactions for those products and services are performed in local currencies.

The tariffs and auction price steps in national currencies are the basis for the trading decisions that a Market Participant makes.

We believe that the monitoring of transactions should be based on the data and conditions that Market Participants were aware of and familiar with when they placed their orders and concluded their trades.

Respondents' feedback

No. of respondents: 15

Even though the majority of the respondents supported the change, most of them have serious concerns about the codes that are not ISO 4217-compliant (GBX, EUX and PCT). These codes do not exist in the ISO 4217 currency code standard. The use of EUR and GBP in the place of EUX and GBX merely require the use of the decimal places representing Euro cents and pence. If the introduction of the codes EUX and GBX is to satisfy the TRUM text "(currency of the price using the smallest denomination in the currency system)" that implies that all price amounts should be expressed in their lowest currency this means that all the currencies will have to be revised accordingly. For example, "grojz", "haléru", "ore", etc will have to be added. Hence, they recommended to limit the allowed values to the scope of the currency codes defined in the standard ISO 4217.

Some of the respondents advised that Lithuanian litas should be removed from the list, since the currency was replaced by the euro on 1 January, 2015.

The Agency's view:

The Agency will consider implementing the change. 'LTL=Lithuanian litas' will be removed, since the currency does not exist anymore.

Additional changes proposed (Annex C):

Several respondents suggested to align the allowed entries with ISO 4217 in order to ensure compliance with industry standards. Moreover, some allowed values are not adding value to the reported data, e.g. EUX and GBX, which are merely replacing two decimals. PCT is not a currency and should not be allowed.

The Agency's view:

The Agency will not consider implementing the change.

Additional changes proposed (Annex C):

Another proposal was that Fields 18, 20 and 21 should have a proper field for the unit of measurement that not only represents the capacity, as it is now in the field 16 "Measure unit", but that also give the information if the price for that capacity is for day or for year.

Hereafter are some examples of the possible units:

€/kWh/h/d; €/kWh/h/y; GBX/ kWh/h/d; GBX/kWh/h/y €/kWh/d/d; €/kWh/d/y; GBX/ kWh/d/d; GBX/kWh/d/y.

The reasoning behind the proposal is that the information on the price that came from the combination of the fields 16 and 17 is not complete.

The Agency's view:

The Agency will not consider implementing the change. As pointed out by stakeholders, the information is already available/reported through the existing fields.

Additional changes proposed (Annex C):

One (1) respondent proposed that Fields 18, 20 and 21 should have a proper field for the unit of measurement that not only represents the capacity, as it is now in the field 16 "Measure unit" but that also give the information of the tariff rate. For example in the current structure it is not possible to indicate whether the price is €/kWh/h/d or €/kWh/h/y.

Besides the fields Currency (17) and Measure unit (16), the respondents suggest to add a new field to indicate the tariff rate. Such a new field should have the values /year, /quarter, /month or /day, so that the fields No (18) Total price, (20) Reserve price, (21) Premium price have the unit of measure made by 'Currency'/'Measure unit'/'Tariff Rate'.

The Agency's view:

The Agency will not consider implementing the change. As pointed out by a stakeholder, the information is already available/reported through the existing fields.

Additional changes proposed (Annex C):

Furthermore, one (1) respondent requested a change to Data Fields 12, 15 and 16 of Table 4 and asked that additional capacity unit (kWh/d) should be accepted.

The Agency's view:

Introducing the unit kWh/d would be redundant, since it is already an allowed value in Data Field No (16) 'Measure unit'. It is also not relevant for Fields 12 and 15. The Agency will therefore disregard this change.

Proposed change No. A.4.3

It is proposed that the Data Field No (34) Price paid to TSO (Underlying Price) should be composed in schema of 2 fields: price and currency. The latter is missing, which is why it is proposed to introduce in the schema a field for currency with allowed values:

BGN=Bulgarian lev

CHF=Swiss franc

CZK=Czech koruna

DKK=Danish krone

EUR=Euro

EUX=Euro cent

GBX=Penny sterling

GBP=Pound sterling

HRK=Croatian kuna

HUF=Hungarian forint

ISK=Icelandic króna

LTL=Lithuanian litas

NOK=Norwegian krone

PCT=Percentage

PLN=Polish złoty

RON=Romanian new leu

SEK=Swedish krona/kronor

USD=U.S. dollar

Reason for the change

The only allowed currency at the moment is Euro.

Currently, nine EU Member States are not part of the Euro-Zone - where the national currency is Euro. The denomination of tariffs / prices for capacity products of the TSOs from those countries, as allowed by the national laws, are in local currencies. The transactions for those products and services are performed in local currencies. The tariffs and auction price steps in national currencies are the basis for the trading decisions that the Market Participant makes.

We believe that the monitoring of transactions should be based on the data and conditions that the Market Participants were aware of and familiar with when they placed their orders and concluded their trades.

Respondents' feedback

No. of respondents: 14

The majority of the respondents supported the idea that Data Field No (34) Price paid to TSO (Underlying Price) consists in schema of 2 fields: price and currency.

Some of the respondents pointed out that they support the change as long as the extra currency attribute does not become mandatory for the reporting.

Another respondent pointed out that this change should be applicable not only for gas but also for the reporting of electricity transportation contracts in accordance with Table 3 of the REMIT Implementing Regulation.

A few of the respondents claimed that the current schema has a generic attribute that defines the currency used for all prices within the electronic document and therefore the prices for an electronic document should all be expressed in the same currency.

One (1) of the respondents mentioned that they had already set up the currency conversion in the backend system. In addition, they emphasised that sub-units of the currencies should be either included for all currencies (not only EUR etc.), or for none of the currencies, to keep the reporting consistent. Furthermore, they raised the question of whether reporting will still be allowed in the euro value if data is converted from a different currency.

The Agency's view:

The Agency will consider implementing the change. 'LTL=Lithuanian litas' will be removed.

Proposed change No. A.4.4

It is proposed to change the schema restrictions to permit multiple codes for the "ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE" schema field and to add two new codes:

ZSH = Shipper

ZUA = Market Information aggregator

in addition to currently accepted codes:

ZSO = System Operator

ZUJ = Auction office

ZUF = Capacity Platform Operator

Reason for the change

The currently allowed values of the attribute

"ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE" do not cover the case and do not offer the possibility to define the right market role of the reporting entity when a Solution provider company (Technical Manager of a system), which is a related undertaking (subsidiary

or parent undertaking) company of a TSO, is reporting data to ACER on behalf of the TSO and on behalf of other related undertakings with a holding/company group.

We consider the introduction of the identification of the role of the reporting entities and the use of the coding ZUA=Market Information Aggregator to be appropriate in such cases.

Respondents' feedback

No. of respondents: 14

The majority of the respondents agreed with adding multiple codes for the defining of the market role of a reporting entity. Therefore, the codes ZSH representing the Shipper and ZUA, Market Information aggregator, should be added to Field 'Issuer_MarketParticipant.MarketRole.Code'.

One of the respondents proposed that a relevant description of this schema field is added to the TRUM.

The Agency's view:

The Agency will consider implementing the change.

Proposed change No. A.4.5

It is proposed to add a new accepted codes to the attribute "PRIMARY_MARKETPARTICIPANT.IDENTIFICATION" (Data Field No (27) Market participant identification):

- the code "A01" for an ACER code,
 - the code "LEI" for Legal Identifier Entity,
 - the code "GLN/GS1" or Global Location Number,
 - the code "BIC" for Bank Identifier Code
- in addition to currently accepted codes "305" – representing an EIC code.

Reason for the change

Other possible codes for the identification of MPs shall be accepted for the facilitation of data reporting about transactions between two MPs, of which one or both do not have EIC codes.

The introduction of additional codes will harmonise the codes for the identification of Market Participants with the codes used in Table 1 and 2.

Respondents' feedback

No. of respondents: 15

The majority of the respondents did not have any objections to these additional codes, but there were some concerns regarding the BIC and LEI codes, as it is not a requirement to make use of these codes within the gas sector.

Some of the respondents pointed out that identification through other coding schemes could lead to confusion and unnecessary IT developments, which would generate unnecessary costs. Besides, the EIC codes can be easily checked, as opposed to other coding schemes.

Most of the respondents answered that it is not an issue to add the coding schemes 'A01' for an ACER code, and '9' for a GLN code to Data Field 27 coding schemes. Moreover, they suggested that since all market participants are supposed to have an ACER code, it is sufficient to extend the coding schemes to EIC, ACER and GLN.

While supporting the proposal, one (1) of the respondents considered that the change should also be applicable to electricity in such a way that EIC Code and ACER Code are linked with respect to electricity-related fundamental data.

The Agency's view:

The majority of respondents did not have any objections to the inclusion of additional codes. The Agency will consider introducing the ACER code. This is also in line with Article 10 of the Implementing Regulation, which stipulates that when reporting information referred to in Articles 6, 8 and 9 thereof, including inside information, the market participant shall identify itself, or shall be identified by the third party reporting on its behalf, using either the ACER registration code which the market participant received or the unique market participant code which the market participant provided at registration, in accordance with Article 9 of REMIT.

The Agency will also consider changing the required format of the EIC code within the schema to `<xs:length value="16"/>`.

Additional changes proposed (Annex C):

Two (2) of the respondents recommended to allow an additional code 'ZSO' - TSO managed code (35 alphanumeric characters) in Data Field 27 Market Participant identification. The purpose of the change is to allow the TSOs to fulfil their reporting obligations in cases when the MP to which the capacity is assigned has no EIC code or the code is not available to the TSO. It could happen that such MPs do not have EIC code and at the same time are not registered under REMIT (by the respective NRA or/and through CEREMP) and hence, do not have ACER code as well.

As an example, in the German gas market the balancing group responsible is the nominating party. A balancing responsible is not the one who buys capacity, no trader, so in fact he doesn't have to register as a market participant with ACER and a balancing group responsible has also no obligation to get an EIC-Code. TSO has no instrument to force them getting one of these codes.

This means that TSO will in some cases not be able to fill in the field 'INTERNAL_MARKETPARTICIPANT.IDENTIFICATION' (described as: Identification of the Market Participant that provided the nomination information to the Responsible Transmission

The Agency's view:

Data Field 27 'Market Participant identification' shall identify the market participant to which the capacity is assigned and therefore only Market Participant identification codes provided while registering as a Market Participant in accordance with Article 9 of REMIT should be reported in accordance with Article 10(2) of the Implementing Regulation.

Proposed change No. A.4.6

It is proposed to add a new accepted codes to the attribute

"TRANSFEROR_MARKETPARTICIPANT.IDENTIFICATION" (Data Field No (36) Transferor identification):

- the code "A01" for an ACER code,
- the code "LEI" for Legal Identifier Entity,
- the code "GLN/GS1" or Global Location Number,
- the code "BIC" for Bank Identifier Code

in addition to currently accepted codes "305" – representing an EIC code.

Reason for the change

Other possible codes for the identification of MPs shall be accepted for the facilitation of data reporting about transactions between two MPs, of which one or both do not have EIC codes.

The introduction of additional codes will harmonise the codes for the identification of Market Participants with the codes used in Table 1 and 2.

Respondents' feedback

No. of respondents: 12

Most respondents pointed out that it would be appropriate to extend the coding schemes to EIC, ACER and GLN.

Additionally, some of the respondents offered a few clarifications about the uniqueness of using one of the proposed codes. Firstly, the Legal Identifier Entity (LEI) code is different from the EIC code in that it allows for subsidiary companies to have the same LEI number. In other words, the LEI code does not preserve uniqueness. Secondly, the concept of BIC number is similar to the one of LEI. Therefore, the respondents raised the question of how the Agency plans to distinguish between an n-number of market participants if all of them use the same BIC number. Thirdly, although GS1 coding scheme should be unique, following the EIC approach, it appears that in the ACER registry there are a few cases where this is not the case (i.e. two market participants use the same GS1). However, the fact that there are only 200 GS1 codes in the whole REMIT registry (1.5%) might not justify the use of this code and therefore the complexity of the REMIT database.

Fourthly, sometimes market participants appear to have two ACER numbers. This will allow such market participants to use different EIC codes for different reporting instances.

The Agency's view:

The majority of respondents support additional codes. The Agency will consider introducing an ACER code and changing the EIC code format to <xs:length value="16"/>.

Proposed change No. A.4.7

It is proposed to add new accepted codes to the attribute "TRANSFEREE_MARKETPARTICIPANT.IDENTIFICATION" (Data Field No (37) Transferee identification):

- the code "A01" for an ACER code,
- the code "LEI" for Legal Identifier Entity,
- the code "GLN/GS1" or Global Location Number,
- the code "BIC" for Bank Identifier Code.

Currently the only accepted code is "305" – representing an EIC code.

Reason for the change

Other possible codes for the identification of MPs shall be accepted for the facilitation of data reporting about transactions between two MPs, of which one or both do not have EIC codes.

The introduction of additional codes will harmonise the codes for the identification of Market Participants with the codes used in Table 1 and 2.

Respondents' feedback

The majority of the respondents considered this change to be favourable. However, they did not perceive the use of BIC and LEI code as unique, but rather expressed concern that it will lead to confusion and misunderstandings in the identification of market participants.

One (1) of the respondents recommended not to use code 'A01' as an ACER code, since they use the codingScheme 'A01' to identify an EIC code. Therefore, in order to prevent any confusion, another code (e.g. 'ACE') should be used to identify an ACER code.

The Agency's view:

The majority of respondents support additional codes. The Agency will consider introducing an ACER code and changing the EIC code format to <xs:length value="16"/>.

Additional changes proposed (Annex C):

Two (2) of the respondents suggested a change for Field No (35) Price the transferee pays to the transferor present in Table 4. It should be foreseen the possibility to report also a price formula. Furthermore, transportation transaction could also have an index value, as commodity deals.

The Agency's view:

The Agency will consider creating a new optional field which would allow the reporting of price formula in the same way as in Table 2.

Additional changes proposed (Annex C):

According to the description, the price which the transferee pays to the transferor expressed in the currency per measure unit must be: kWh/h. One (1) of the respondents, however, argued that the price cannot be expressed only in kWh/h in the case of transportation. The description in the TRUM should be more accurate in case of transportation fee as the fee can be EUR/kWh or EUR/kWh/h/d or EUR/kWh/h/runtime.

Example:

hourly Q	30 000	kWh/h	
Total Q	21 600 000	kWh	=(B6*30*24)
runtime price - ...value	21 600,00	EUR	
price	0,0010000	EUR/kWh	
Daily price logic	0,02400	EUR/kWh/h/d	
Runtime price logic	0,7200	EUR/kWh/h/runtime	
Gas Day			
delivery start date	2017. 4. 1. 6:00		
delivery end date	2017. 5. 1. 6:00		
days	30		
hours	720		=(30*24)

The partners are not in the same position in case of the format of the price in the schema Table 4 Data filed number (35). It would be important to describe in the TRUM in more detailed way the possible formats of the fee related to the transportation.

The Agency's view:

Feedback from stakeholders indicates there is no need to change the schema. The suggestion to update the TRUM will be considered.

Proposed change No. A.4.8

It is proposed that the attribute

ORGANISEDMARKETPLACE_MARKETPARTICIPANT.IDENTIFICATION (Data Field No (2) Organised market place identification) is mandatory but DEPENDENT and present ONLY when reporting transactions concluded on an OMP. The attribute is only present when the

PROCESS_TRANSACTION.TYPE (Data Field No (9) "Transportation transaction Type") is equal to

ZSW=Ascending clock auction, or

ZSX = Uniform price auction

and other processes executed on an OMP, excluding:

- ZSY = First come first served
- ZSZ = Secondary market procedure

because those transactions do not always or never happen on an OMP.

Reason for the change

Currently the attribute

ORGANISEDMARKETPLACE_MARKETPARTICIPANT.IDENTIFICATION is mandatory. In case of contracts and transactions concluded outside an OMP or concerning points different than these for which the capacity is contracted on an OMP, the reporting entities cannot provide reasonable data in this attribute.

As a workaround, TRUM and Question No 4.2.1 in FAQs on transaction reporting, state that for such cases the reporting entities should use an arbitrary value "21X-XXXXXXXXXXXY".

The proposal would allow to solve the currently existing issue and avoid the use of arbitrary values.

Respondents' feedback

No. of respondents: 13

Respondents approved of the proposal. They pointed out that in order to change the multiplicity of Data Field 2 from mandatory to dependent it should be ensured that it is only present when the process transaction type (Field 9) is equal to ZSW (ascending clock auction) or ZSX (uniform price auction). Moreover, it should not appear if any other codes are used.

While some of the respondents were in favour of the change, they believed that the Agency should clarify if the platform PRISMA (where are recorded a huge number of transactions) is an OMP or not.

On the other hand, a few of the respondents proposed to avoid the use of mock EIC codes, as may lead later to confusions and uncompleted information provision. In addition, the use of mock values does not seem to respect certain standards of professionalism.

A few of the respondents were happy with the proposal and highlighted that the identification of the OMP shall be Optional and (can be left blank) for other transactions, such as ZSY (First come first served), ZSZ (Secondary market procedure), Over-nomination, Open Subscription Window,

Open season, Storage allocation, Non-ascending clock pay-as-bid auction, Conversion mechanism and Pro-rata mechanism.

The Agency's view:

Almost all of the respondents supported the change. The Agency will consider implementing the change [ORGANISEDMARKETPLACE_MARKETPARTICIPANT.IDENTIFICATION (Data Field No (2) Organised market place identification) is mandatory when the PROCESS_TRANSACTION.TYPE (Data Field No (9) "Transportation transaction Type") is equal to ZSW=Ascending clock auction, or ZSX = Uniform price auction].

Additional changes proposed (Annex C):

Three respondents (3) proposed additional values to be allowed for the attribute PROCESS_TRANSACTION.TYPE (TRUM data field 9) that will permit proper and accurate identification of the applied capacity allocation process:

- XXY* = Pro-rata
- XYZ* = Over-nomination
- YZX* = Open Subscription Window
- ZXX* = Open season
- YXX* = Storage allocation
- XXZ* = Non-ascending clock pay-as-bid auction
- XXY* = Conversion mechanism
- XZY** = Other process

* These codes are merely suggestions.

** Aligned with Edigas standard: StandardStatusCategoryTypeList, Status category code

Appropriate codes must be proposed by the Agency/Edigas for each of the processes where the maximum length of this information should be three alphanumeric characters.

The reasoning behind the change is that it will allow the reporting parties to precise the information for the applied allocation process. Furthermore, it will avoid the usage of workaround and arbitrary values that limit the monitoring possibilities of ACER and the NRAs. With the aim to avoid future schema changes due to non-exhaustiveness of the list of the allowed attribute values and identified processes, the respondents suggested that the 'Other process' type is allowed with the acceptable value of free text with the maximum length of 50 alphanumeric characters.

The Agency's view:

The Agency will consider introducing additional values for the attribute PROCESS_TRANSACTION.TYPE, which will enable a proper and accurate identification of the applied capacity allocation process.

Proposed change No. A.4.9

It is proposed to foresee an alignment in the namespace of gas capacity allocation schema with the namespace of the rest of the Edigas schemas. This means that the current format of the Gas Capacity Allocation schema namespace:

urn:easee-gas.eu:edigas:remit:gascapacityallocationsdocument:5:1

changes to:

urn:easeegas.eu:edigas:remit:gascapacityallocationsdocument:5:1

Reason for the change

A proposal for the alignment in order to harmonise the naming approach of the same family of schemas.

Respondents' feedback

No. of respondents: 17

The majority of the respondents believed that this proposal is beneficial and will harmonise the naming approach of the same family of schemas.

Some respondents requested that the Agency makes sure that the files with old namespaces are still accepted by ARIS after the new namespace is introduced. Furthermore, they suggested to the Agency to provide clear guidance on the procedures for the updating of old reports after the schema is changed and its namespace is modified.

While most respondents supported a general alignment with the EASEE-gas messaging and documentation, it was also suggested that the correct definition of the Edigas namespaces for the electronic documents used within REMIT is:

urn-easee-gas-eu-ed igas-remit-g ascapacityallocationsdocument- 5-1-n. xsd

urn-easee-g as-eu-erf gas-rem it-contractmarketmonitori ngd ocument- 5-1-n. xsd

urn-easee-g as-eu-edigas-rem it-nomi nationmonitoringdocument- 5-1-n. xsd

The Agency's view:

According to the stakeholders' feedback, the namespace should be as follows:

'urn:easee-gas.eu:edigas:remit:gascapacityallocationsdocument:5:1:n'

and file: 'urn-easee-gas-eu-edigas-remit-gascapacityallocationsdocument-5-1-n.xsd'.

The Agency will consider implementing the change.

Additional changes proposed (Annex C):

One suggestion was to update the description of Data Field 34 to also include [kWh/d] as a capacity unit and to add it as a new attribute in the schemas as well. In case that the capacity product is daily and measured in kWh/d, it would be more appropriate to report the information for the transferred capacity and its price in units, corresponding to the type of product, i.e. daily units: kWh/d.

The Agency's view:

The change will be considered for implementation.

Additional changes proposed (Annex C):

For Data Field (29) Procedure applicable, four (4) respondents proposed that the admitted value is:

A01 = CFO, call for orders for assignment

A02 = FCFS, first come first served for assignment

A03 = OTC, Over the counter for assignment

A04 = CFO_SUB, call for orders for subletting/ transfer of use

A05 = FCFS_SUB, call for orders for subletting/transfer of use

A06 = OTC_SUB, call for orders for subletting/ transfer of use

In addition, the respondents highlighted that the procedure applicable (CFO, FCFS, OTS) is valid both for the assignment and for the subletting/transfer of use.

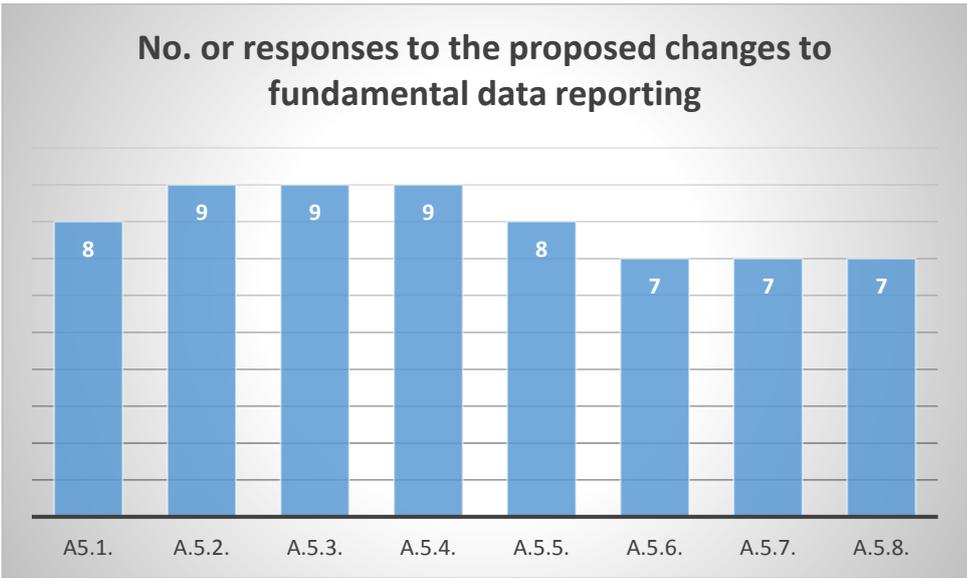
The Agency's view:

The proposal impacts secondary trading only. The Agency will consider introducing additional values and will further discuss them with relevant stakeholders.

3.5. Proposed changes to fundamental data reporting

Figure 7 shows the number of responses to the proposed changes related to fundamental data

Figure 7. Total number of responses to the changes proposed for fundamental data reporting



Total No. of responses received: 64

Gas transparency data

Proposed change No. A.5.1

It is proposed that the element “IDENTIFICATION” in RULES GOVERNING THE TRANSACTION CLASS (Contract Market Monitoring document – Gas Transparency) changes cardinality from mandatory to optional.

Reason for the change

The attribute is mandatory but not applicable for the ENTSOG reporting purposes. There are no transactions that shall and could be identified by ENTSOG because the reporting obligations of ENTSOG simply consist of transferring to ARIS the fundamental data that has been published in an aggregated manner by the TSOs on the ENTSOG Transparency Platform.

Information about any of the transactions is not available at the ENTSOG TP and it is not possible for ENTSOG to populate this mandatory attribute.

Respondents' feedback

No. of respondents: 8

The respondents did not have any objections to making the 'IDENTIFICATION' element optional. Some respondents advised that it must be clear that, in this case, the identification of the Transaction class becomes the 'type' attribute.

The Agency's view:

None of the respondents were opposed to the change. The Agency will consider it for implementation.

Proposed change No. A.5.2

It is proposed to add new field(s)

RESPONSIBLETSO_MARKETPARTICIPANT.IDENTIFICATION + Coding scheme for the identification of the TSO on whose behalf ENTSG is reporting data to ACER as part of the RULES GOVERNING THE CONTRACTMARKETMONITORING_DOCUMENT CLASS.

The following values should be allowed for the TSO identification:

- the code "A01" for an ACER code,
- the code "LEI" for Legal Identifier Entity,
- the code "GLN/GS1" or Global Location Number,
- the code "BIC" for Bank Identifier Code,
- the code "305" representing an EIC code.

Reason for the change

Currently, the schema does not make it possible for ENTSG to indicate which TSO published the data that is included in and submitted to ACER report. This is why ENTSG and the ACER team agreed to use as a workaround the field TRANSACTION IDENTIFICATION, which is mandatory in the same schema but cannot be populated by ENTSG because it is not relevant to the ENTSG reporting process nor to the scope of data that ENTSG reports to ACER.

In order to avoid using inappropriate fields for the identification of the TSO whose TP data is reported to ACER, we consider as reasonable the introduction of a new special attribute.

Respondents' feedback

No. of respondents: 9

Respondents agreed with the introduction of the new field. Some respondents did not see the need to support any other code besides an EIC code, since all TSOs have EIC codes and thus only need the '305' coding scheme, which represents an EIC code. Some respondents also supported the use of ACER, GLN and EIC codes, but nonetheless conceded that they understand the requirement to provide for the LEI and BIC codes in the ARIS system, even though it is not a requirement to make use of these codes within the gas sector.

Three (3) respondents replied that, *'It is possible to add a new attribute to the Contract marketing monitoring document header that is **optional**'*.

The Agency's view:

None of the respondents were opposed to the change. The Agency will consider it for implementation. The field should be mandatory. The allowed codes would be ACER and EIC codes.

Gas nominations

Proposed change No. A.5.3

It is proposed to foresee an alignment in the namespace of gas nomination monitoring schema with the namespace of the rest of the Edigas schemas. This means that the current format of the Nomination Monitoring schema namespace:

urn:easee-gas.eu:edigas:remit:nominationmonitoringdocument:5:1
changes to:

urn:easeegas.eu:edigas:remit:nominationmonitoringdocument:5:1

Reason for the change

A proposal for the alignment in order to harmonise the naming approach of the same family of schemas.

Respondents' feedback

No. of respondents: 9

None of the respondents objected to the change. Three (3) respondents suggested that the change is based on input from Easee-gas. Furthermore, respondents requested that the Agency makes sure that the files with old namespaces are still accepted by ARIS after the new namespace is introduced.

Two respondents said that the correct definition of the Edigas namespaces for the electronic documents used within REMIT should be:

urn-easee-gas-eu-edigas-remit-gascapacityallocationsdocument-5-1-n.xsd

urn-easee-gas-eu-edigas-remit-contractmarketmonitoringdocument-5-1-n.xsd

urn-easee-gas-eu-edigas-remit-nominationmonitoringdocument-5-1-n.xsd

It should be noted that the 'release' of the electronic document implementation guide is now indicated by replacing the value 'n' with the release number. The existing attribute 'release' is still present in the schema but is no longer mandatory.

The Agency's view:

The Agency will consider to implement the namespace as follows:

'urn:easee-gas.eu:edigas:remit:nominationmonitoringdocument:5:1:n' and file

'urn-easee-gas-eu-edigas-remit-nominationmonitoringdocument-5-1-n.xsd'.

The change can be considered only if the XSD schemas are also changed. The Agency will consider changing the namespace in the context of additional changes elsewhere in this schema.

Proposed change No. A.5.4

It is proposed to remove the ZSO code as an identifier in the code schema of gas nomination monitoring schema and to add the codes from the REMIT Implementing regulation. Currently, the schema uses the following three codes for the identification of market participants/TSO/shipper:

- The code "305" for an EIC party code.
- The code "A01" for an ACER code.
- The code "ZSO" for a TSO managed code.

Thus, the following values would be allowed for the identification:

- the code "A01" for an ACER code,
- the code "LEI" for Legal Identifier Entity,
- the code "GLN/GS1" or Global Location Number,
- the code "BIC" for Bank Identifier Code,
- the code "305" representing an EIC code.

Reason for the change

ZSO will be removed since the Agency does not have access to the ZSO register and cannot identify the parties. It is therefore proposed to use the codes from the Implementing Regulation No. 1348/2014, which, in addition to the ACER and EIC code, permits Legal Entity Identifier (LEI), Bank Identifier Code (BIC), Energy Identification Code (EIC), Global Location Number

(GLN/GS1). Impacted attributes are: INTERNAL_MARKETPARTICIPANT.IDENTIFICATION,
ISSUER_MARKETPARTICIPANT.IDENTIFICATION
RECIPIENT_MARKETPARTICIPANT.IDENTIFICATION
RESPONSIBLETSO_MARKETPARTICIPANT.IDENTIFICATION
INTERNALACCOUNT
INTERNALACCOUNTTSO
EXTERNAL ACCOUNT
EXTERNAL ACCOUNTTSO
ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE
RECIPIENT_MARKETPARTICIPANT.MARKETROLE.CODE

Respondents' feedback

No. of respondents: 9

The majority of the respondents disagreed with the proposal to remove the ZSO code as an identifier in the code schema of gas nomination monitoring schema. However, most of the respondents supported the extension of allowed values, even though they showed some reservations concerning the use of LEI and BIC codes in this context.

Two (2) market participants pointed out that:

1) The code 'ZSO' is used in several places, as it is needed for the identification of the reporting party (TSO = ZSO). This is also acknowledged by the suggestion in A.4.4 where ZSO is still allowed ('ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE').

2) TSO-managed codes are necessary until NRAs have ensured that ALL market participants are registered with EIC or ACER codes and that the TSOs can, as a result, fulfil their reporting obligations.

For market communication, there are industrial standards given by EASEE-gas and approved by regulators. These standards are valid for the whole gas market and are used as binding principles for the TSO-TSO, Shipper-TSO, and market area manager-Shipper communication. These standards also define which codes can be used for the identification of the parties, points, accounts etc. and it is a basic element of these standards to require that market role specific codes are used for identification of the parties. This requirement is satisfied when a ZSO Code is used. Therefore, it is necessary to use a ZSO code in market communication. As ZSO is a valid code for the communication, the introduction of ZSO-code in REMIT reporting would align the standardized communication within the market with the communication towards ACER as the market participants are able to create the messages towards ACER from the information given in the messages used in market communication based on the industrial standards.

Example in the German gas market, where the balancing group responsible is the nominating party: A balancing responsible is not the one who buys capacity, no trader, so in fact he doesn't have to register as a market participant with ACER and a balancing group responsible has also no obligation to get an EIC-Code. The TSOs have no instrument to force them getting any of these codes.

This means that the TSOs in some cases won't be able to fill the field "INTERNAL_MARKETPARTICIPANT.IDENTIFICATION" (described as: Identification of the Market Participant that provided the nomination information to the Responsible Transmission System Operator.) in the gas-nomination-monitoring-schema."

There are many examples where ZSO is necessary:

`internalAccount =`

`NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.internalAccount`

`externalAccount =`

`NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.externalAccount`

In addition, ZSO code should remain for following Edigas XSD element for gas allocation:
`GasCapacityAllocations_Document.Transportation_Transaction.primary_MarketParticipant.account.internalAccount`

By "internal/external account" TSOs identifies the shipper's account/accounts in the TSOs internal systems, not the shipper itself.

It is possible that one shipper has many internal/external accounts.

For the nomination reporting purposes this identification can be done by using ZSO or 305 (EIC), but bear in mind that here the EIC code refers to EIC area code (with "Y" letter within the code number) and not the EIC for party codes (with "X" letter within the code number). It is not always possible to use EIC (Y) code for every shipper's account.

issuer_MarketParticipant.marketRole.code

In this element the "ZSO" is not a code to identify the Market Participant but to describe the characteristic of Market Participant – the role of the MarketParticipant.

recipient_MarketParticipant.marketRole.code

Currently, the only permitted code to describe the characteristic of Market Participant is "ZUA" in this element.

issuer_MarketParticipant.identification

recipient_MarketParticipant.identification

responsibleTso_MarketParticipant.identification

Currently, the only permitted code to identify the TSO in these elements is the EIC code.

internalAccountTso =

`NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.internalAccountTso`

externalAccountTso =

`NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.externalAccountTso`

Currently, the only permitted code to identify the TSO in these elements is the EIC code.

The Agency's view:

The Agency would like to point out the following: According to Article 9 of the Implementing Regulation, gas TSOs or third parties on their behalf shall report the day-ahead nominations and final re-nominations of booked capacities by specifying the identity of the market participants involved as well as the allocated quantities. When reporting information referred to in Articles 6, 8 and 9 of the Implementing Regulation, including inside information, the market participant shall identify itself, or shall be identified by the third party reporting on its behalf, using either the ACER registration code which the market participant received or the unique market participant code which the market participant provided at registration, in accordance with Article 9 of Regulation (EU) No 1227/2011.

In summary, gas TSOs or third parties on their behalf shall in their nominations specify the identity of the market participants involved by means of an ACER or any other code the market participant provided at registration, in accordance with Article 9 of Regulation (EU) No 1227/2011. The ZSO code (internal TSO code) is not provided in the registration of Market Participants and shall therefore not be allowed in the fields that identify Market Participants. The Market Participants that shall be identified are at least:

reporting TSO/Balancing Group Manager (issuer_MarketParticipant.identification), responsible TSO (responsibleTso_MarketParticipant.identification), the Market Participant that provided the nomination information to the Responsible TSO (internal_MarketParticipant.identification).

The identification of Market Participants in the above fields shall be done via an EIC X or ACER code. According to the Agency's understanding, this is already possible for all nominations except those made in Germany and Austria, where the Market Participant providing the nomination information to the Responsible TSO (internal_MarketParticipant.identification) is a Balancing Group Responsible (BGR) and not a Shipper. According to the respondents to the Public Consultation, a BGR is not considered a Market Participant in the sense of Article 2 (7) of REMIT and therefore does not have an obligation to register. The Agency is currently examining this scenario and possible solutions.

The Agency appreciates that the information provided with the current electronic formats reflects market communication based on the industrial standards, but would like to highlight that the standards were primarily developed for TSO-TSO, Shipper-TSO, and market area manager-Shipper communication. REMIT reporting, on the other hand, has a different purpose. Therefore, if the electronic formats used for TSO-TSO, Shipper-TSO, and market area manager-Shipper communication are to be used for REMIT reporting as well, the following adjustments are necessary in line with Article 9 of REMIT Implementing Regulation: the removal of the ZSO code from Market Participants fields and the introduction of an ACER code into at least INTERNAL_MARKETPARTICIPANT.IDENTIFICATION^{1*},

ISSUER_MARKETPARTICIPANT.IDENTIFICATION,

¹ *options for AT, DE to be considered.

RESPONSIBLETSO_MARKETPARTICIPANT.IDENTIFICATION,
INTERNALACCOUNTTSO,
EXTERNAL ACCOUNTTSO.

Proposed change No. A.5.5

We noticed the typographical error in the schema relation between gas direction and timeseries (RULES GOVERNING THE TIMESERIES CLASS) which is incorrectly referenced in the schema as timseries.

Reason for the change

The correction of the typographical error in the word timeseries that has been referred to as “timseries”, with the letter e missing after tim.

Respondents' feedback

No. of respondents: 8

None of the respondents objected to the change.

The Agency's view:

The Agency will consider implementing the change.

LNG Data

Proposed change No. A.5.6

It is proposed to introduce the specific field "IngFacilityOperatorIdentifier", placed within the element "IngUnavailabilityReport", which must reference the market participant whose reporting obligations are fulfilled with the reported "IngUnavailabilityReport".

Reason for the change

At the moment, the market participant whose reporting obligations are fulfilled with the particular report is not clearly identified.

Respondents' feedback

No. of respondents: 9

Seven (7) respondents were in favour of introducing the 'IngFacilityOperatorIdentifier' field.

Two (2) respondents, while supporting the change, suggested a change in the description of the related data field: *'Pursuant to Implementing Regulation (1348/2009) Art. 9, point 3, C on REMIT Regulation it is the LNG system operator, not the Market Participant's obligation to report planned and unplanned unavailability of the LNG facility'*.

Two (2) respondents stated that this proposal is out of scope because their reporting procedure does not concern Edigas messages.

The Agency's view:

All relevant responses were in favour of the proposal. The Agency will consider implementing the change.

Proposed change No. A.5.7

It is proposed to add two new accepted codes for market participant identifiers to the current identifiers, which will allow market participants to be identified with one of the following accepted values:

- the code "A01" for an ACER code (existing code)
- the code "LEI" for Legal Identifier Entity (existing code),
- the code "GLN/GS1" or Global Location Number (NEW code),
- the code "BIC" for Bank Identifier Code (NEW code),
- the code "EIC" for the Energy Identification Code (existing code).

Reason for the change

Other possible codes for the identification of market participants shall be accepted for the facilitation of data reporting. The introduction of additional codes will harmonise the codes for the identification of Market Participants used in other REMIT schemas.

Respondents' feedback

No. of respondents: 9

Seven (7) respondents were in favour of introducing 'GLN/GS1' and 'BIC' to the list of current identifiers. Two (2) respondents said that the change does not concern them.

The Agency's view:

The existing ACER and EIC codes for market participant identifiers are considered sufficient. No NEW accepted codes will be added.

Gas Storage data

Proposed change No. A.5.8

It is proposed that in the REMITStorageSchema, storageFacilityReport the additional value "**GRP**" ("**Storage group**") is inserted among acceptable values for the "storageType" field.

Reason for the change

Each of the currently listed permitted storage types (DSR) (ASR) (ASF) (SGL) (PPC) (GHT) (SRC) cover only the identification of an individual storage facility. These cannot be used for the identification of a storage group. A storage group can be composed as a mix of different types of storage facilities. An example is a storage group called 'Basic underground storage' and is composed of three storage facilities that are grouped: Yela = Aquifer (ASR) + Marismas = depleted field (DSR) + Serrablo = depleted field (DSR). In order to be able to complete this field appropriately and identify storage group datasets it was proposed to introduce an additional storage type "GRP" (= Storage Group).

Respondents' feedback

No. of respondents: 7

All respondents welcomed the proposal of adding the value 'GRP' to the list of accepted values for the 'storageType' field.

One (1) of the respondents asked for additional ACER Guidance for situations where the reporting is done for a storage group that is composed of the same type of facilities (for example, storage group composed of only DSR facilities). Since the reported type could be either 'GRP' or 'DSR' and both would be correct, the respondent requested that the Agency advise which type should be used in this particular case. The respondent suggested to use 'GRP' for any type of storage group (composed of either different or the same types of facility).

The Agency's view:

All relevant responses were in favour of the proposal. The Agency will consider implementing the change and establishing a unique code for storage groups that are composed of the same and different storage types of facilities.

Additional changes proposed (Annex C):

One (1) respondent called attention to a potential error in REMITStorageSchema_V2.xsd>complexType 'facilityType' should be indicated as sto:eic rather than lng:eic.

Change line 208 :

<xs:element name="eicCode" type="Ing:eic" minOccurs="1" maxOccurs="1"/>
to:
<xs:element name="eicCode" type="sto:eic" minOccurs="1" maxOccurs="1"/>

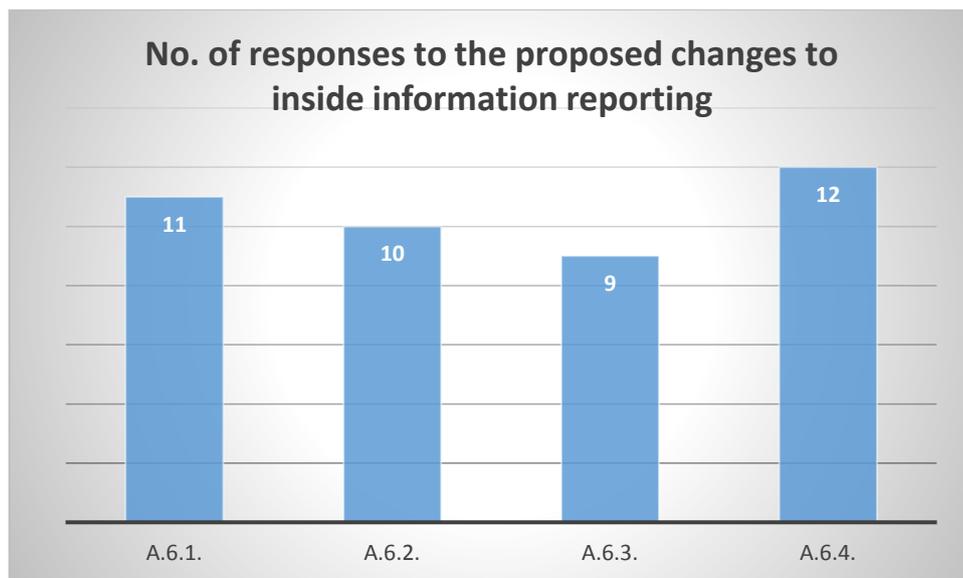
The Agency's view:

The Agency will consider correcting the error.

3.6. Proposed changes to inside information reporting

Figure 8 shows the number of responses to the proposed changes related to inside information reporting.

Figure 8. Total number of responses to the changes for inside information reporting



Total No. of responses received: 42

Gas Inside Information

Proposed change No. A.6.1

It is proposed to change Field No (16) Affected Asset or Unit of the UMM schema №2 "Unavailabilities of gas facility in a way that all assets or/and units affected by an outage or unplanned maintenance (**a single event affecting multiple assets in the same way i.e. same timing**) can be published within a single report.

The Unavailability report will contain a repeatable set of data fields that identify the affected asset or unit, the balancing zone to which it belongs to and the details of technical, available and unavailable capacity during the period of outage or unplanned maintenance.

Reason for the change

Currently, the UMM schema №2 “Unavailabilities of gas facilities” allows market participants to announce an interruption event for one single asset or unit per message which makes it impossible to report multiple affected assets within one report. As it often happens during a period of outage or unplanned maintenance that many assets and/or units are affected TSOs have to publish consequences of the same event in multiple reports; which is cumbersome and might cause inconsistency.

An improvement of the REMIT data quality and a simplification of the reporting approach.

Respondents' feedback

No. of respondents: 13*

Seven (7) respondents found that this change could be beneficial.

On the other hand, four (4) respondents expressed concern that this contradicts the current approach of one event per asset/unit. It is their opinion that this could lead to misunderstandings and should therefore be avoided. They proposed that the option to continue with the current approach should be preserved, even if it is eventually made possible to report multiple assets in one UMM.

Moreover, the respondents suggested that changing the schema in such a way would result in a major revision of inside information platforms (on database structure, user interfaces, web services, web feeds and reporting) as well as of market participants' internal systems (which feed inside information platforms with UMMs), in a way that would not represent their internal process of generation and management of unavailabilities. That could probably result in MPs avoiding using the functionalities made available by the new schema, keeping using the current approach of 1 UMM, 1 timeframe/capacity, 1 asset (which the new schema accepts anyway).

Some of the respondents suggested if the proposed change will be pursued, to make it optional, in order to let MPs use the current approach.

One (1) of the respondents maintained that the nesting of asset outages within a single UMM should be avoided. The market requires clarity and it gets this from information pertaining to an asset, not an asset group. The ability to publish currently exists and although some market participants find the current functionality cumbersome, other market participants find it workable. Therefore, the respondent cautioned that this change would result in additional costs for market participants without guaranteeing any benefits to the market or the Agency.

*One (1) respondent did not refer to the proposed change, and their response was therefore deemed out of scope.

The Agency's view:

A consensus of opinion has not been reached. The proposal will currently not be considered for implementation.

Additional changes proposed (Annex C):

Four (4) respondents proposed a new schema attribute for the denotation of the energy flow direction named 'Direction code'.

The purpose of the attribute is to identify how the energy flow is seen from the perspective of the market participant disclosing the interruption information.

Properties of the field:

- 'Direction code' to be a sub-field of the 'Affected asset or unit name' attribute;
- Applicability: Optional, because not all gas facilities have direction:
 - ❖ The Storage facilities, LNT terminals, Compressor stations do not have direction;
 - ❖ Connection points have direction: entry only, exit only or entry/exit;
 - ❖ Possible values: The attribute should have two possible values:
 - ❖ Entry (or special coding for the Entry direction, i.e. Edigas code: Z02);
 - ❖ Exit (or special coding for the Exit direction, i.e. Edigas code: Z03)
- Type: alphanumeric characters

The motivation for this change was that currently UMM Schema No2 "Unavailabilities of gas facilities" does not have an attribute for flow direction.

In case that the affected asset or unit is a connection point (interconnection point, cross-border point, connection point between transmission system operator and storage facility and so on), it could be bidirectional (entry/exit point). The point's capacity is direction dependent, respectively the values of the UMM Schema No2 attributes: Technical capacity, Available capacity and Unavailable capacity depend on the point direction. In summary, the technical, available and booked capacities in normal circumstances are different for the different point direction. This means that during an event of unavailability, both sites of a point could be affected and respectively - the affected capacities are different per point direction.

The Agency's view:

The Agency will consider implementing the change.

Additional changes proposed (Annex C):

Another suggestion was to extend the maximum length/number of allowed alphanumeric characters for the UMM Schema No3 'Other market information' - Data Field No 13 'Remark' from 500 to 1,000. The aim is to provide as exhaustive as possible information to the market through messages based on Schema No3 "Other market information". The objective is to provide as much as possible details to the market through the UMM "Remark" fields for events requiring disclosure of inside information and explain the relevant circumstances with regards to the possible impact on wholesale energy prices. This would be beneficial for all market participants and will facilitate the publication process of the disclosing party.

The Agency's view:

The Agency will consider extending the length of Data Field No 13 'Remark' from 500 to 1,000 in UMM Schema No3 'Other market information'.

Proposed change No. A.6.2

It is proposed to change the accepted values of the Data Field (8b) Unit of measurement and to add a new unit "GWh/h" and remove the existing unit "mcm/d".

Thus, the allowed units for gas UMMs will be: kWh/d, kWh/h, GWh/h, GWh, GWh/d, TWh.

Reason for the change

An alignment of units of measurement used for the reporting of gas storage and inside information will allow for consistent and unified reporting of data.

Respondents' feedback

No. of respondents: 10

None of the respondents objected to the adding of a new unit 'GWh/h', however three (3) of them disagreed with the removal of the existing unit 'mcm/d', as this would cause a misalignment with the other schemas.

Furthermore, three (3) respondents suggested to use the [UN/ECE Recommendation 20 common codes](#) for the identification of units of measure.

The Agency's view:

The existing unit 'mcm/d' will not be removed and "GWh/h" introduction may be considered. Volumetric units were proposed to be removed due to the lack of conversion criteria and consequent inaccurate conversions to energy units.

Proposed change No. A.6.3

It is proposed to introduce the new accepted value “Storage facility unavailability” among the list of accepted values in the Data Field No (4/b) Type of Event.

Reason for the change

The current schema does not allow reporting the unavailability of the whole gas storage facility with just one UMM report. In order to report the unavailability of the whole gas storage facility market participants have to report three UMM reports: one UMM report with the Type of Event “Storage unavailability”, one UMM report with the Type of Event “Injection unavailability” and one UMM report with the Type of Event “Withdrawal unavailability”. The proposal limits the number of UMMs that market participants have to publish.

Respondents’ feedback

No. of respondents: 9

Eight (8) respondents welcomed the proposal to introduce the new accepted value ‘Storage facility unavailability’, as it would be a valuable simplification measure in line with the general objective of reducing unnecessary burdens, supported by market participants.

Some of the respondents requested for more clarity in the Manual of Procedures with regard to the use of specific codes for the differentiation between ‘Storage unavailability’ and ‘Storage facility unavailability’. The respondents also called for more guidance on when to use the event types ‘Storage facility unavailability’, ‘Storage unavailability’, ‘Injection unavailability’, and ‘Withdrawal unavailability’.

One (1) respondent opined that a more valid and appropriate change in this area would be to align it with the Fundamental data reporting approach.

The Agency’s view:

All relevant responses were in favour of the proposal. The Agency will consider implementing the change. The MoP on data reporting will be updated in due time.

Electricity Inside Information

Proposed change No. A.6.4

We would like to consult on whether the change would be beneficial for electricity UMMs.

It is proposed to change the UMM schema in a way that all assets and/or units affected by an outage or unplanned maintenance (a single event affecting assets in the same way i.e. same timing) can be published with a single report.

Reason for the change

Currently, the UMM schema “Unavailability of electricity facilities” allows MPs to announce an interruption event for one single asset or unit per message, which makes it impossible to report multiple affected assets within one report. As it often happens during a period of outage or unplanned maintenance that many assets and/or units are affected, market participants or TSOs have to report consequences of the same event in multiple reports which is cumbersome and might cause inconsistency.

Respondents’ feedback

No. of respondents: 13

Five (5) respondents supported the proposed change, while another three (3) suggested to make it optional, since the obligation to publish information on different assets/units with a single report would imply a change of IT systems for all market participants whose IT systems manage data on a single asset/unit basis.

Some of the respondents agreed that this change for electricity will deliver multiple benefits, such as greater clarity and transparency of market participants’ reports, reduced volumetric(s) for all IT platforms involved, and less effort for the reporting and analysis of UMM data. One (1) such respondent expressed that they are in favour of the proposed change, since it would be beneficial to all those that report and read the information.

Contrariwise, four (4) respondents claimed that such approach could cause inconsistency of reporting and difficulty to reconcile with other data already published within the market, such as bid and offers and other trade data. Thus, they believed that the users would prefer a 1:1 relationship between the Production Unit and its related outage (or a Generating Unit and its related outage). Another respondent stated that if the proposed change is taken forward there would be a negligible time and resource saving to market participants in terms of data submission.

Moreover, in order to avoid a potentially very high turnover on UMMs, one (1) respondent advised not to implement changes A.6.1 and A.8.2 simultaneously (each UMM may potentially contain N assets with M timeframes/capacities).

One (1) respondent did not refer to the proposed change.

The Agency’s view:

A consensus of opinion has not been reached. The proposal will currently not be considered for implementation.

Additional changes proposed (Annex C):

One (1) respondent’s suggestion referred to the problem of typographical error on REMITUMMSchema_V2.xsd. Namely, Market Participant element of the XSD is spelt incorrectly

in the line 387 of the document; therefore, a correction is required in order to prevent unnecessary validation failure against the XSD.

```
(</xs:element> <xs:element name="marketParticipant" type="umm:marketParticipant")
```

The Agency's view:

The Agency will consider correcting the error.

Additional changes proposed (Annex C):

One (1) respondent suggested to include an optional field for a unit or an asset in the schema for other market information Inside information. Other market information often relates to a unit or an asset. At the moment, market participants can include information about a unit or an asset in the remarks field with other relevant information. Filtering out relevant information for a specific unit or asset from a text field is more time-consuming than if the unit would have been reported in a separate field. A separate field for a unit or an asset would make it easier for the market participants reading the reports to identify information related to a specific unit or asset, in the same way they do for unavailability information where the unit is reported in a separate field.

The Agency's view:

At the meeting on 13 June 2018, stakeholders explained the reasoning behind the change they proposed: 'When the Available/Unavailable capacity is not known at the time of the UMM publication the Schema No. 3 is used. When the information on the capacity becomes available Schema No.2 is reported.'

When possible, and if asset characteristics are known, schemas No. I and II shall be used.

If schema No. III is used, there is an option to declare the affected assets in the 'Remarks' field. The Agency will not consider implementing the change.

Additional changes proposed (Annex C):

Another respondent addressed that the definition for the field technical capacity, which is unclear, and this creates misunderstandings when reading the provided data on the Agency's side. It is worth noting that there is no such information provided under the TP regulation therefore market participants might have difficulties filling this field in. Consequently, they proposed to either make the definition clearer or make the field optional.

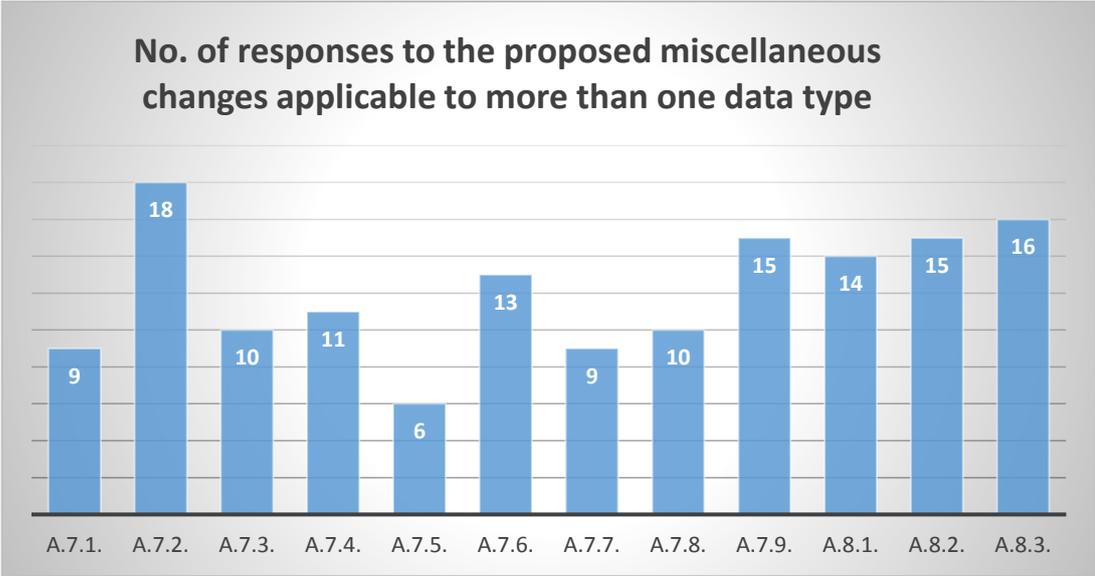
The Agency's view:

The Agency discussed the proposal with stakeholders during the meeting on 13 June and, as the participant referred to the definition in other regulation and not REMIT, the proposal to make field 'Technical capacity' optional will not be considered for implementation.

3.7. Proposed miscellaneous changes applicable to more than one data type

Figure 9 shows the number of responses to the proposed changes related to more than one data type

Figure 9. Total number of responses to miscellaneous changes



Total No. of responses received: 146

Table 1 and Table 2

<p>Proposed change No. A.7.1</p> <p>It is proposed that all fields related to "datetime/timestamps" in Table 1 and Table 2 schemas only allow four digits for the year.</p>
<p>Reason for the change</p> <p>An alignment of the format of year reporting with the stored data in the Oracle database.</p>

Respondents' feedback

No. of respondents: 9

Most of the respondents did not foresee any problems with the proposal to have four digits only for the year element in datetimes and timestamps in the Table 1 and Table 2 schemas.

One of the respondents confirmed that their system is also an Oracle database and that this change will make the creation of datetime stamps easier.

The Agency's view:

The majority of respondents did not see any problems with the proposal. The change will be considered for implementation.

Proposed change No. A.7.2

It is proposed that each element of the type “datetime” in Table 1 and Table 2 schemas includes an enforcement of the applicable pattern in regard to the local time zone. No time zone offset or zoned time (with offset) is required.

Reason for the change

The alignment of the format of “datetime” across the REMIT reporting schemas would ensure more clarity than just a stipulation in the guidelines that the reported time should refer to the certain time zone.

Respondents' feedback

No. of respondents: 18

The majority of the respondents disagreed with the proposal, given that the time settings are already aligned in the REMIT schemas and changing the settings would not bring any added value. Moreover, the respondents advised the Agency to use UTC in order not to confuse the reporting and market participants.

Some respondents pointed out that the change would lead to a misalignment of the date and time expression in the relevant schemas with the rest of REMIT electronic formats.

A few respondents agreed that the requirement to refer to a specific time zone may create additional issues and loss of data quality, especially in those cases where transactions happen cross border between two different time zones. Furthermore, the respondents advised that all ‘datetime’ information in Table 1 and Table 2 schemas is reported with time zone offset to avoid misunderstandings. It will facilitate for the market participants trading in different market areas with different time zones, reading ACER formatted information.

One (1) of the respondents suggested to add an offset to all ‘datetime’ fields so that no interpretation is needed and input values can be checked to see what the reporting entity meant. When not allowing offsets anymore will not be possible to check if there is an error in the submitted data.

One (1) respondent commented that the element ‘datetime’ should be further developed in such a way that some validation rules are implemented. If load type is baseload, then it should be made

sure that the difference between the reported deliveryEndDate and deliveryStartDate equals at least one day. Checks should also be done on loadDeliveryStartTime and loadDeliveryEndTime, in such a way that those are in line with the load type reported. Those checks should also be done for Table 1 of REMIT Implementing Regulation.

One (1) respondent did not fully understand the proposal, but nonetheless commented that it could potentially present a significant change for both market participants and organised market places.

The Agency's view:

The proposal was meant to address delivery start and end time. As indicated in the TRUM, the time of the delivery profile in Table 1 and 2 should be expressed in local time. No offset shall be provided. The Agency will consider implementing the change.

Additional changes proposed (Annex C):

A respondent suggested that in defining the 'datetime' format across the REMIT reporting schemas, the Agency should also take into account the state of the art of IT service providers and to which extent the clock used in IT applications or software can be perfectly synchronised or not with UTC time convention.

The Agency's view:

The proposal was deemed out of scope and will currently not be considered for implementation.

<p>Proposed change No. A.7.3</p> <p>It is proposed that default values in mandatory fields are removed from the schemas. The schemas will have empty mandatory fields and reporting parties will have to fill the mandatory fields with a valid value in order to comply with the schema.</p>
<p>Reason for the change</p> <p>This would prevent reporting parties from <u>unintentionally</u> reporting default valid values.</p>

Respondents' feedback

No. of respondents: 10

Most of the respondents found the proposal reasonable. They therefore agreed with the proposal to remove default values in mandatory fields in order to avoid mistakes and thus improve the quality of data in general.

The Agency's view:

The respondents found the proposal reasonable. The Agency will consider implementing the change.

Proposed change No. A.7.4

It is proposed that the UTI type in Table 1 and Contract ID in Table 2 schemas does not allow the use of space characters.

Reason for the change

A space within an identifier can cause issues and should not be allowed.

Respondents' feedback

No. of respondents: 11

The majority of the respondents agreed to prevent the use of space characters in the UTI, as this change would ensure alignment with the UTI validation rules currently used under EMIR.

Some respondents welcomed the change under the condition that some delimiters, such as underscore ('_'), are still allowed in the relevant attributes: UniqueTransactionID and ContractID.

The Agency's view:

The majority of respondents agreed with the schema change and the Agency will consider implementing the change. See A.1.3.

Proposed change No. A.7.5

It is proposed that the present pattern of the element "Extra" in Table 1 and Table 2 schema is changed to "`\w+==(\\d+\\.\\d+) |(\\d+) |(\\w+)) (; \\w+==(\\d+\\.\\d+) |(\\d+) |(\\w+)) *`"

allowing the reporting of only one pair and not two pairs, as is presently required.

Reason for the change

The reduction of the restriction to one pair and the simplification of the use of the field "Extra".

Respondents' feedback

No. of respondents: 6

Most respondents did not object to this change, as it only extends the set of acceptable values for the field 'Extra'.

One (1) respondent proposed that the field 'Extra' remains 'Not Required' as it is at the moment.

Another (1) respondent requested more details about the change, specifically a clarification of what the section in the parentheses refers to.

Lastly, another (1) respondent argued that this change is not of interest to Edigas and that this field is apparently available only to enable an extension of the schema with content that is not defined.

The Agency's view:

The majority of respondents did not object to the schema change. The Agency will consider implementing the change.

Additional changes proposed (Annex C):

According to one (1) respondent, in order to organise a soft change of the schema for Table 1, 2, 3 and 4, they propose to have at disposal of RRM's two different test environment to test both 'old' and 'new' files:

- REMIT TEST ENVIRONMENT 1 - with old rules and old xml schemas/version, to allow tests for specific submissions or for bug fixing purposes;
- REMIT TEST ENVIRONMENT 2 - with new rules and new xml schemas/version, to allow tests for new implementations.

The Agency's view:

The new schema will be available for testing in the ARIS TESTFRAMEWORK environment. There is no need for two separate environments.

Additional changes proposed (Annex C):

Another proposal regarding Table1, Table2, and Table3 schemas is to introduce a new lifecycle mechanism — 'Correction'. This new value would be entered in Data Field: Action type and would allow for corrections. This lifecycle mechanism will allow to correct the erroneous data fields of the previous report. This solution would be particularly helpful for reports manually typed directly through the application forms provided by RRM's. Unfortunately sometimes some erroneous data can occur because of fat finger, or not filling the necessary fields. This change would also be a step to unify REMIT and EMIR reporting mechanisms, since EMIR introduced a "Correction" lifecycle mechanism form 1st November 2017.

The Agency's view:

Since the possibility to correct erroneous records is already available in the current lifecycle mechanisms, there is no need for an additional one.

Additional changes proposed (Annex C):

A respondent recommended to add new fields to Table 1 section 'Transaction details' and Table 2 section 'Contract details' for units of measurement of gas quantity or for pricing purposes. In addition, the respondent suggested to introduce an additional possible value among acceptable values – thousand cubic metres. The proposal is determined by the complexity of price formulas used in long-term contracts, and by the existence of different units of measurement of gas quantity applied to the price of gas and volume of delivery. For instance, the price is set in US dollars per thousand cubic metres, and the volume of delivery is defined in million cubic metres. The current schema does not allow the use of such unit as thousand cubic metres which is intrinsic to price formulas.

The Agency's view:

The introduction of thousand cubic metres in the list of accepted values for quantity can be considered for implementation.

Additional changes proposed (Annex C):

For Table1- Fields (42) (56) Quantity unit and for Table 2 - Fields (20) Notional quantity unit, Table 4 - Field (16) Measure unit, it was requested that the TRUM document clarify that for natural gas trades the value of KWh is expressed at the temperature stated in the contract (usually 0° or 25°), since the temperature is a relevant element for the conversion rate of natural gas.

The Agency's view:

The proposal is outside the scope of the Public Consultation. The Agency will consider to consult relevant stakeholders about whether there is a need for further clarification.

All data types (where relevant)

Proposed change No. A.7.6

It is proposed that all mandatory schema elements that are of type string and have only maximal length defined have also minimal length=1.

Reason for the change

Following a good practice of the XML element/attribute definition.

Respondents' feedback

No. of respondents: 13

None of the respondents objected to the proposal.

Some of the respondents stated that minimal and maximum lengths of mandatory fields are not an issue, as this is implemented in all the Edigas schemas.

Another respondent affirmed that they have also introduced minimum length enforcement validation within their own XML Schema Definition (XSD) to avoid some mandatory fields being submitted and displayed as NULL.

The Agency's view:

None of the respondents objected to the change. The Agency will consider implementing the change.

Proposed change No. A.7.7

We consult on the approach to introduce validation rules on mandatory fields, where appropriate, see some examples in the Reason for the change below.

Reason for the change

As examples, it is expected that the elements

"Rights_MarketDocument/mRID", "Rights_MarketDocument/TimeSeries/mRID", "PartyID" in Table 3

"GasCapacityAllocations_Document/identification",

"GasCapacityAllocations_Document/process_Transaction.identification",

"GasCapacityAllocations_Document/Transportation_Transaction/identification" in Table 4

"IngFacilityOperatorIdentifier", "ParticipantType" in REMIT LNG data reporting with mandatory cardinality also have an appropriate value.

This change would therefore enhance data quality for monitoring purposes.

Respondents' feedback

No. of respondents: 9

In general, the respondents supported the introduction of validation rules for mandatory fields. Some respondents suggested that it is better to discuss the validation rules with the relevant stakeholders, depending on the schema in question, before implementation.

One (1) respondent stated that it is not clear from the proposal whether the validations are limited to just structural validations against the XSD or if the Agency wishes to introduce additional business validation. They requested that the Agency provides further details on the business validation rules (if required), together with sufficient notice to implement (12-14 months) and a required implementation date.

Another respondent advised to make any validation rules transparent and clearly identified within the XML schema. This should allow market participants to pre-validate their reports, avoid rejections from ARIS, and add further processes to re-validate the submissions.

Three (3) respondents said that they do not understand what is being asked of them. They found the examples unclear.

The Agency's view:

The detailed business validation rules will be prepared and, as suggested, discussed with relevant stakeholders before implementation. The business validation rules do not have any impact on the XSD schema (no structural changes of XSD are needed).

LNG and Gas Storage Data

Proposed change No. A.7.8

It is proposed to introduce into the LNG and Gas Storage schemas the same lifecycle mechanism that exists in REMIT Table1 and REMIT Table2 allowing for corrections, modifications and cancelations of previously reported records. Thus, the field for Action type will have the following possible values:

- New
- Modify
- Error
- Cancel.

Reason for the change

Currently, it is not possible to update or to cancel the submitted LNG or GAS STORAGE files. The same lifecycle mechanism as for REMIT Table1 and REMIT Table2 will be applied.

Respondents' feedback

No. of respondents: 12

Ten (10) respondents welcomed the proposal to introduce the lifecycle mechanism to LNG and Gas Storage schemas. Seven (7) of the ten respondents welcomed the proposal as is (i.e. the same mechanism as for Table 1 and 2), while two (2) respondents suggested some alignment with the UMM schema for the unavailability reporting, and one (1) respondent advised the Agency to

use the three options that are utilised under UMM reporting of Active/Inactive and Dismissed. This would allow for lifecycle management and alignment with the already produced data. They stated that this would in turn help the participants save their investment money.

Some respondents asked for clear guidance regarding the lifecycle event.

Two (2) respondents said that the change does not concern them.

The Agency's view:

All relevant responses were in favour of the proposal. The Agency will consider implementing the change. At the meeting on 13 June 2018, stakeholders commented that there is a need for a record identifier and the kind of replication of principles that is used for REMIT Table1 and REMIT Table2. The use of the 'Cancel' function is to be explained within the guidelines, but it was suggested that it be used to cancel planned unavailability, for example.

Additional changes proposed (Annex C):

One (1) respondent recommended for Gas Storage data *a unique ID per record, which makes it clearer how to apply the action type. This is distinct from the sequence number, as it makes modifications and errors easier.*

The Agency's view:

The Lifecycle reporting for Gas Storage will be harmonised with the existing practice for Table 1 and Table 2.

Additional changes proposed (Annex C):

Two (2) respondents suggested the following identical changes for REMITStorageSchema_V2.xsd and REMITLNGSchema_V2.xsd:

"Add 'Cancel' optional field if required (see below):

<xs:enumeration value="C"/> <!-- cancel --> pointed out that adding 'Cancel' optional field if required (see below):

```
<xs:enumeration value="C"/> <!-- cancel -->
```

Because the change proposal A.7.8. in Annex A is listing 4 options (N/M/E/C) and the XSD only contains three (N/M/E).

Following the implementation of the LifeCycle mechanism as for REMIT Table 1 and REMIT Table 2, lifecycle events would include: The below listing is based on description under 3.2.10 in TRUM v3.0

a/ the submission of a new report, identified as 'new' (N)

b/ the modification of details of a previous report, identified as 'modify' (M)

c/ the cancellation of a wrongly submitted report, identified as 'error' (E)

d/ the termination of an existing report, identified as 'cancel' (C)

A/ Specific remark related to unavailability reporting

Similar to UMMs, unavailability reports related to the same event may be updated several times before and during the event. Inside information publication and unavailability reporting may also require a prognosis, for example regarding the duration of the event.

Typically, unavailability reports and UMM are covering the same event.

For unavailability reporting, some alignment with the UMMSchema (REMITUMMSchema_V2) seems applicable or logical, as this would enable to implement threaded reporting.

1/ Use of unique identifier to enable threaded reporting

To enable threaded reporting for unavailability reporting, similar as for UMM reporting, we can use the existing datafield **<reportingEntityReferenceID>** as unique identifier, having the same function as <messageID> in the UMM schema.

We can also support replacing <reportingEntityReferenceID> by <messageID>.

This datafield / unique identifier would then also have the same field restriction as in the UMM V2 schema and will be composed of:

- 25characters_3digits to match the UMM MessageID composition.
- The first 25 characters are then to be kept identical for each report related to the same unavailability event.
- The last 3 digits are incremental and indicate the sequence of updates related to the same unavailability event.

2/ Use of ActionType status field to enable threaded reporting

Example

Based on currently suggested ACER Schemas V2, the lifecycle function could be set up like this (for unavailability reporting):

- **New report:** ActionType=N, unavailabilityEndFlag=Estimated,
messageID=1234567890ABCDEFGHIJKLMNO_001

- **Modification report:** ActionType=M,
unavailabilityEndFlag=Estimated,
messageID=1234567890ABCDEFGHIJKLMNO_002

- **Closure of the event:** ActionType=M,
• unavailabilityEndFlag=Confirmed,
• messageID=1234567890ABCDEFGHIJKLMNO_003

In case of error or cancelation: (report needs to be deleted):

- ActionType=**C**, unavailabilityEndFlag=Confirmed,
- messageID=ABCDEFN123456GHIJKLM7890O_006

OR

ActionType=**E**, unavailabilityEndFlag=Confirmed,
messageID=ABCDEFN123456GHIJKLM78900_006

We would request **additional Guidance** on new procedures related to **lifecycle event reporting for unavailability reports**. Especially related to a cancellation (or error):

In case of cancellation of an unavailability event :

- *Should the unavailabilityEndFlag be indicated as ‘confirmed’ or ‘estimated’?*
- *Should ActionType “E” or “C” be used? (“Cancel” seems most logical)*

B/ Alternate approach for further alignment with UMM schema for unavailability reporting

The above described approach is intended to keep schema changes minimal and would only require additional Guidance by ACER. An alternate approach is to align the unavailability reporting further with the UMM schema by using the <eventStatus> option fields “Active / Dismissed / Inactive”.

Potential removal of the <EndFlag> field

Each unavailability is to be considered as having an estimated <unavailabilityEnd>, until the event is closed using the ‘Inactive’ event status.

Implementation of the UMM lifecycle function to unavailability reporting thus has the additional benefit of enabling to remove <unavailabilityEndFlag> (Estimated / Confirmed end time).”

The Agency’s view:

The Agency will consider to add ‘Cancel’ as an Action type element of XSD. The Agency will also consider providing additional guidance on the new lifecycle event reporting for unavailability reports. During the meeting on 13 June 2018, stakeholders did not express any need to amend the schema as suggested in the proposal.

Proposed change No. A.7.9

It is proposed to align the units of measurement in the REMIT Storage and REMIT LNG schemas with the units for gas UMM reporting.

Current restrictions for REMIT Storage and REMIT LNG schema:

cm, cm/d, mcm, mcm/d, kWh, kWh/h, kWh/d, GW, GWh, GWh/h, GWh/d, MW, MWh, MWh/h, MWh/d, TWh, Therm/d, kTherm/d, MTherm/d, Therm, kTherm, MTherm, %.

The proposal is to limit the restrictions to

kWh/d, kWh/h, GWh/d, GWh, TWh, GWh/h.

Reason for the change

The alignment of units of measurement in REMIT Storage and LNG schemas with the units for UMM reporting will allow consistent and unified reporting.

Respondents' feedback

No. of respondents: 15

Five (5) respondents did not agree with the proposed change for several reasons: it is not aligned with other schema types and thus the benefits are not clear, it limits the list of the allowed values for the unit attributes in the concerned XSDs; and finally, it impacts contracts and systems that have been configured to document units of measure in Therm/d, kTherm/d, MTherm/d.

Three (3) respondents said that the units of measure should respect the [UN/ECE Recommendation 20](#): Codes for Units of Measure Used in International Trade: common codes. These units of measure are used within the electricity and gas sectors.

One (1) respondent suggested to also include MWh/d and MWh, while another two (2) respondents suggested to include MW/h only.

Three respondents (3) supported the proposal, and one (1) of them advised to also align the units with other schemas, since performing analyses would become difficult, due to the fact that conversion would be necessary.

One respondent (1) replied that even though they do not deal with LNG or storage REMIT reporting, they would introduce the change for capacity reporting as well.

The Agency's view:

Stakeholders stressed there is a need to keep both volumetric and energy units. The Agency will therefore not remove volumetric units. Additionally proposed units are already allowed in the schema.

Proposed change No. A.8.1

It is proposed that storage and LNG facilities (fields "storageFacilityIdentifier" and "IngFacilityIdentifier") are identified with EIC W and Z codes only. Currently, the schema allows the identification of facilities also with ACER and LEI codes. ACER and LEI identifiers should be removed from the facility identifiers.

Reason for the change

ACER and LEI identifiers should be removed because their purpose is to identify Market Participants and not assets.

Respondents' feedback

No. of respondents: 14

None of the respondents objected to the change.

Four (4) respondents replied that LNG and storage facilities should be identified only with EIC 'W' codes because 'Z' codes are used for the identification of interconnection points.

One respondent strongly encouraged the Agency to avoid any internal validation on the type of EIC code (W, T, X, Y or Z), as this symbol is used by the EIC local issuing offices to facilitate the process and maintain good data quality. If the Agency wishes to improve the quality of the EIC codes they receive, they can perform a validation on the check digit.

One (1) respondent supported the proposal that storage and LNG facilities are only identified with EIC W and Z codes, provided that dummy EICs can still be used.

The Agency's view:

All relevant responses were in favour of the proposal. The Agency will consider implementing the change. As suggested by four participants, EIC Z identifies interconnections points and shall therefore be used only in LNG/Storage unavailability reports to provide information about the unavailability of an interconnection point of the facility. The Agency has published Annex IX to MoP on data reporting - *List of LNG facilities subject to reporting according to REMIT*, which includes the allowed EIC W and Z codes. For more information please visit <https://documents.acer-remit.eu/category/remit-reporting-user-package/manual-of-procedures-mop-on-data-reporting/>.

Additional change proposed (Annex C):

One (1) respondent pointed to a potential error in REMITStorageSchema_V2.xsd:

complexType "facilityType" should be indicated as **sto:eic** rather than lng:eic

Change line 208:

```
<xs:element name="eicCode" type="lng:eic" minOccurs="1" maxOccurs="1"/>
```

to:

```
<xs:element name="eicCode" type="sto:eic" minOccurs="1" maxOccurs="1"/>
```

The Agency's view:

The Agency will consider correcting the error.

Additional change proposed (Annex C):

Two (2) respondents asked to return the reportingEntityReferenceID (or MessageID) in ACER Receipts to be able to improve their matching of the ACER Receipt with the original SSO/LSO report. Currently, this data field is not included in the ACER Receipt, although it is stated as such in the ACER XML comment field.

The Agency's view:

This proposal is not within the scope of this Public Consultation. It is not related to the electronic formats used for reporting, but to a receipt returned from processing.

Inside Information (UMMs)

Proposed change No. A.8.2

It is proposed to introduce two new elements “intervalStart” and “intervalStop” into the complex type “capacity” and make the complex type repeatable. The change is applicable to both gas and electricity UMM schema.

Reason for the change

Currently, the UMM schema allows only for one outage value per defined time period. If the available/unavailable capacity fluctuates over time market participants have to publish every change of available/unavailable capacity in a separate UMM even if the outage values and affected time periods were known in advance. Several Inside Information Platforms have implemented a way to publish this information as if it were one UMM, but these values and time slots must be split in the ‘back end’.

This would be a significant change, not only on the technical implementation side. For this reason, we would like to receive opinion whether such a change would be welcomed by Inside Information Platforms. We would also welcome views on whether this change should be applied to only one type of UMMs (gas or electricity) or both.

Notwithstanding the challenges, the benefit to the market would be easier reporting and potentially fewer revisions or updates to UMMs for these kinds of outages.

Respondents' feedback

No. of respondents: 17

Many respondents thought that the introduction of new data items would have significant implications for market participants, as they will need to change their systems. The respondents commented that the same outcome could be achieved by introducing minimal changes to the current V1 XSD, for example by representing the main outage at high level together with a sub-grouping for the capacity changes. This would also allow the Agency to support both versions of the XSDs more easily, while also making it possible to ensure a transition period for market participants.

Five (5) respondents disagreed with the proposed change, as it would require too much effort to update each hour, if the capacity available is changing on an ad-hoc basis. The aim of this change

should also not be to update after the maintenance etc. what was the capacity that was available during the outage.

On the other hand, four (4) respondents welcomed the change, while another five (5) preferred to make it optional. One of the latter stated that a new element should not replace “Event start” and “Event stop” or an even better solution would be to fully align with the ENTSO-schemas for outages. Furthermore, one (1) of the respondents that supported the change as optional expressed their belief that this would be a significant change and cautioned that sufficient implementation time must be ensured, while also recommending to remove the available capacity field, which will become obsolete.

One (1) respondent opined that the new elements ‘intervalStart’ and ‘intervalStop’ could be introduced only for the attributes ‘Unavailable Capacity’ (Data Field (9)) and ‘Available Capacity’ (Data Field (10)). They specified that it is not reasonable to introduce the new elements ‘intervalStart’, ‘intervalStop’ for the attribute ‘Technical capacity’ (Data Field No (11/b)) because the technical capacity remains unchanged during the events of unavailability and serves only to show the value of the maximum firm capacity that the transmission system operator offers to the market.

Two (2) respondents did not refer to the proposed change.

The Agency’s view:

The respondents to the Public Consultation are split in their opinion, with some in favour of the change and some against. Those that do not support the change believe that the introduction of new data items would have significant implications for market participants and that it would require too much effort to update the capacity each hour if the available capacity changes on an ad hoc basis. The respondents also stressed that this change should not make it necessary to update the information on available capacity after periods of maintenance, etc.

According to many respondents, the change should be optional.

During the meeting on 13 June, participants supported the proposed change, especially for the electricity UMMs. They did not provide any relevant examples for gas.

The proposal will be considered for implementation in the electricity UMM schema, taking into account that the new elements ‘intervalStart’ and ‘intervalStop’ could be introduced only for the attributes ‘Unavailable Capacity’ (Data Field (9)) and ‘Available Capacity’ (Data Field (10)) and NOT for the attribute ‘Technical capacity’ (Data Field No (11/b)). The Agency will prepare and communicate the technical means on how to accommodate the change.

Additional changes proposed (Annex C):

One (1) respondent suggested that the same outcome (as in proposal UMM A.8.2.) can be achieved with a simpler modification to V1 XSD. They therefore proposed to introduce a sub-grouping for the reporting of outage profile:

```
<xs:complexType name="OutageProfileType">
```

```

<xs:sequence>
    <xs:element minOccurs="1" maxOccurs="200" name="OutageProfileSegment"
type="OutageProfileSegmentType"/>
    </xs:sequence>
</xs:complexType>
<xs:complexType name="OutageProfileSegmentType">
    <xs:sequence>
        <xs:element name="OutageProfileSegmentStart" minOccurs="1"
maxOccurs="1" type="ESMP_DateTime" />
        <xs:element name="OutageProfileSegmentEnd" minOccurs="1"
maxOccurs="1" type="ESMP_DateTime" />
        <xs:element name="OutageProfileSegmentCapacity" minOccurs="1"
maxOccurs="1" type="CapacityType" />
    </xs:sequence>
</xs:complexType>

```

The benefits of this sub-grouping is that provides simplicity for technical implementation and flexibility for Market Participants to use the profiling as they see fit. The profiling being optional can be helpful as not every outage will require a profile. The message will include a main event as well as optional profiles (in a parent child relationship); each profile segment will include event start/end and capacity.

The Agency's view:

See the last paragraph of the *Agency's view* on the previous page.

Proposed change No. A.8.3

It is proposed to change the Data Field No (16) Affected Asset or Unit EIC Code from optional to mandatory.

Reason for the Change

These EIC codes will help to link affected assets or unit to the market participant(s) and fundamental data received.

Respondents' feedback

No. of respondents: 18

Eight (8) respondents suggested that they cannot support this proposal, since not all facilities and physical objects can be identified with EIC. They argued that the change may impose limitations for inside information disclosure whenever the affected assets or units do not have an EIC code. Additionally, a respondent commented that a specific EIC code does not exist for all the gas facilities (e.g. compression stations, gas pressure reduction stations).

A few respondents argued that if the field were to be made mandatory, the Agency would have to ensure that market participants get EICs for all their facilities. Currently, a very significant number of market participants has no possibility of getting EICs for storage and consumption facilities. Furthermore, EICs shall be provided separately for production and generation unit. The EICs for the production and generation unit shall not be equal.

On the other hand, seven (7) respondent specified that they support the proposal and pointed out that the field should be replicable in order to allow the reporting also in case of multiple assets availability. They also commented that the EIC code will help achieve a consistent identifier for the ACER and for the users who rely on their interpretation of REMIT Data to make business decisions.

Another (1) respondent emphasised that not all assets or units have an EIC code and that, in order to avoid additional efforts and costs for market participants, the data field should remain optional. In addition, the respondent proposed that it would have to be clarified whether, how, and when already sent (former, current, and future) UMMs would have to be resent with an added EIC code.

Two (2) respondents did not refer to the proposed change.

The Agency's view:

The Agency will consider to make Data Field No (16) 'Affected Asset or Unit EIC Code' mandatory. The change will be reflected in the MoP on data reporting, which will also provide examples of where field content can be omitted. The field will remain optional in the schema.

4 ANNEX I – List of Respondents

No	Respondent	Type	Country
1	AIGET	Industry association	IT
2	ANIGAS	Industry association	IT
3	BP-UK	Industry association	UK
4	Bulgartransgaz	RRM/TSO	BL
5	Centrica	Market Participant	UK
6	Easee-gas	Industry association	BE
7	EDF Group	Market Participant	FR
8	EFET	Industry association	EU
9	EFETnet-Ponton GmbH	RRM/Industry association	DE
10	ELCOM	NRA	CH
11	ELEXON	Inside Information Platform	UK
12	ENI	RRM/Market Participant	IT
13	ENTSO-E	RRM/ ENTSO-E	EU
14	ENTSO-G	RRM/ ENTSO-G	EU
15	EPEX SPOT	RRM/OMP/Industry association	FR
16	ETR Advisory	Industry association	UK
17	EURELECTRIC	Industry association	EU
18	EUROPEX	Industry association	EU
19	FLUXYS BE	RRM/TSO	BE
20	GasTerra	Market Participant	NL
21	GAZPROM	Market Participant	DE
22	GAZ-SYSTEM	RRM/TSO	PL
23	GIE	RRM/Industry association	EU
24	GM&T Ltd	Industry association	UK
25	GME	RRM/OMP/Inside Information Platform	IT
26	GRTgaz	RRM/TSO	FR
27	Hungarian Gas Trade	Industry association	HU
28	ICE Trade Vault	RRM/OMP	UK
29	IOGP	Industry association	Global
30	JAO	RRM/Industry association	LU
31	LEBA	Industry association	UK
32	Nord Pool	RRM/OMP/Inside Information	SE
33	OGE	RRM/Market Participant	DE
34	OMIE	RRM/OMP	ES
35	PRISMA	RRM/OMP	DE
36	ROBOTRON	RRM/Market Participant	DE
37	RWE	RRM/Market Participant	DE
38	SSE	Market Participant	UK
39	STATOIL	Market Participant	UK
40	TAURON	Market Participant	PL

41	VNG	Market Participant	DE
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