

**EFET response to
ACER Public Consultation on the Publication of Extracts from the
European Register of Market Participants under REMIT
PC_2013_R_06**

EFET Market Supervision Committee

13th December 2013

The European Federation of Energy Traders (EFET)¹ welcomes the public consultation of the Agency for the Cooperation of Energy Regulators (ACER) on the publication of extracts from the European register of market participants under REMIT. We consider the overall approach adopted by ACER to be reasonable and pragmatic.

1) Information necessary for market participants to complete their registration obligations according to Article 9(1) of REMIT

- (a) Is the scope of data foreseen to be published sufficient for market participants to complete their registration, especially with regard to the information required in Section 4 of the registration format, and thus fulfill their obligation under Article 9(1) of REMIT?

Yes, we consider the scope of data foreseen to be published to be sufficient.

- (b) In order to identify or verify the identity of a related undertaking, is the publication of information in fields 108 to 110 (address, city, postal code) necessary and appropriate?

Yes, it is useful for verification purposes.

- (c) Is the publication of other company's identifier such as VAT Number in field 112 or the codes in fields 113 to 116 (EIC, BIC, LEI, GS1) or 118 (trade register) necessary and appropriate (please take into consideration that they might not be available for all market participants)?

No, it is not necessary.

- (d) Do you believe that the scope of data to be published from the European Register should be increased or decreased?

We consider the level of information appropriate for the purpose. There is no need for less or additional data to be provided.

2) Information to improve the transparency of wholesale energy markets

- (a) Is the scope of data foreseen to be published for transparency purpose appropriate?

Yes, although there is little added value in publishing the date of validity (field 123). We should have confidence that National Regulatory Authorities monitor whether market participants within their jurisdiction update the data at regular intervals.

- (b) Do you believe that the scope of data to be published from the European Register for transparency purpose should be increased or decreased?

We consider the level of information appropriate. There is no need for less or additional data.

¹ EFET promotes and facilitates European energy trading in open, transparent, sustainable and liquid wholesale markets, unhindered by national borders or other undue obstacles. We currently represent more than 100 energy trading companies, active in over 27 European countries. For more information, visit our website at www.efet.org.