



ACER Consultation on the Trade Reporting User Manual (TRUM) The EDF Group Response

September 2, 2014

General comments

The EDF Group welcomes this second ACER's public consultation on the draft Trade Reporting User Manual (TRUM) and the evaluation of responses to the first consultation on the TRUM. We particularly welcome the trading scenarios and the various examples which help stakeholders to better understand the Agency's expectations in terms of reporting. However, although new developments have been added for the reporting non-standard contracts, the EDF Group believes that an important work still needs to be done in close cooperation with involved market participants.

The EDF Group still has some concerns regarding the REMIT reporting requirements and the content of the TRUM. The key issues are detailed in question 1 hereafter.

- 1) Please provide us with your views on the scope and the objectives of this document. In particular, please provide your opinion on whether the kind of information included and the structure of the TRUM are suitable to facilitate transaction reporting. If not, please explain which additional information the TRUM should cover and/or how it should be structured.
 - (i) **Consistency between TRUM and Implementing Acts (IA).** The current version of the TRUM is based on the latest draft IA issued by the European Commission (v42). We recall the need to have a timely update of the TRUM should any modification occur in the future draft versions of the IA in order to help all market participants to have the best understanding of their reporting requirements and processes.
 - (ii) **Consultation on non-standard contracts.** Although the current version of the TRUM provides information on how data fields listed in Table 2 Annex 1 of the draft IA should be populated, the EDF Group believes that a lot of work still needs to be carried out in order to capture all the complexity and the diversity of this kind of contracts. To do so, we believe that ACER should foresee two main tools, the first one being the preparation of an extensive list of trading scenarios for non standardized contracts based on market participants' feedback (please refer to annex 1 of our response). Then, given the fact that all scenarios cannot be covered *ex-ante* and that the market is a living space with new type of contracts regularly emerging, we believe that ACER should foresee one specific scenario enabling the reporting of "non -identified" contract with no mandatory fields. This would enable reporting entities putting their best efforts to report specific contracts that have not been identified in the scenarios. We also welcome ACER's proposal to grant reporting entities the

right "to submit a query to the Agency describing a trading scenario and a suggestion on how to report the specific trade" (p. 138).

- (iii) **ACER's responsibilities and requirements.** The current draft TRUM does not provide information regarding data integrity nor further provisions regarding ACER's responsibilities and requirements. We also noted that ACER did not report in its consultation feedback our comments on this topic. We therefore recall the issues we raised in our response to ACER's public consultation on the draft TRUM (May 5 2014): we believe that the foreseen requirements appeared incomplete and imbalanced, creating an asymmetric situation - in terms of responsibility, requirements and processes - between ACER and market participants. There is a lack of provisions describing processes and requirements falling on ACER, e.g. on data security (please refer to the second part of the EDF Group response for further details on this point).

Acceptance receipts of reported transactions. The process of validation of transaction reports is inadequate and not robust enough. The EDF Group recalls the need to modify and strengthen the acceptance process. ACER should thus provide both RRM and market participants with acceptance and validation receipts on a close to real time basis so that market participants are not put at risk of breaching their legal obligation in the event of ACER sending out notifications up to D+2 and allow sufficient time to rectify any issues. The close to real time notification service must ensure market participants know that ACER has received a transaction report, that the data fields are completed as expected and that it has been fully matched with the corresponding report from the respective counterparty.

Governance of the public list of standard contracts. The TRUM should provide market participants with detailed rules regarding the setting up and updating process of the public list of standard contracts if this is not explicitly provided for by the Implementing acts. We would understand that these rules include exceptions or extraordinary procedures in order not to hinder the markets' development. A solution enabling market participants to receive notifications of new contracts and market places added to the list is strongly recommended. We welcome ACER's proposal to send periodical newsletters to take into account changes in market situation and transaction reporting issues to address. However we would like that this kind of update also applies to the public list of standard contracts and organized market places. Indeed having this list made public as soon as possible is key element for market participants to assess the real impact of the implementation of REMIT.

- (iv) **Procedures in case of failures of ARIS system.** The Agency should clarify whether the fall-back solution in case of failure of the ARIS system or a "force majeure" happened would be defined in the TRUM or in another document.

- (v) **Governance of reporting of contracts upon request.** Where a request is made by ACER under Article 4 of the REMIT Implementation Act for list of contracts such as intra-group transactions or contracts for the physical delivery of very low volumes of produced gas and electricity, the nature of the request needs to be substantiated to an individual case or investigation and the market participant must be provided with sufficient time to provide such information. The mechanism and format of the data for providing such information must be defined in the TRUM. It should clarify whether (i) this reporting will fall within the existing reporting framework for standard and non-standard contracts and (ii) persons to whom those contracts relate become subject to registration as a market participant but also as required under article 9 of the TRUM.

- 2) Please provide us with your general comments on the purpose and the structure of the draft TRUM. In particular, please provide your opinion on whether the information the Agency intends to include in the first edition of the TRUM is sufficient for the first phase of the transaction reporting (contracts executed at organized places). If not, please explain which additional information should be covered?

Besides the comments developed in question 1), we would like to recall ACER that the first edition of the TRUM also needs to provide, as soon as possible, clear information for the second phase of reporting relating to non standard contracts reporting. Indeed, the delay granted by the IA should not prevent from anticipating all necessary requirements for non standard reporting. Given the high complexity of such a reporting, market participants need to put in place specific processes and evaluate all associated costs as soon as possible.

- 3) Please provide us with you views on the Agency's proposed approach as regards the list of standard contracts. In particular, please provide your views on whether: (i) the list of standard contract types enables reporting parties to establish whether to use Table 1 or 2 of Annex I of the draft Implementing Acts when reporting information under REMIT and (ii) the identifying reference data listed in Annex II that the Agency intends to collect are sufficient and suitable to establish the list of standard contracts. Do you agree that the list of standard contracts in Annex II should also be considered sufficient to list the organized market places? Please justify your views.

(i) Views on the list of standard contract types

The list of standard contracts seems to be complete. However this list could be completed by the following information:

- Physical / financial regulation
- Maximum depth.



Furthermore, we would like to clarify with ACER that bilateral trades off organised market places should be reported using the standard supply contract field list, but these will not be in scope for the initial go-live of 'standard contract' reporting.

(ii) Views on the identifying reference data

The EDF Group does not have particular views on the identifying reference data.

(iii) As regards the need to have a separate list for of organized market places

For the EDF Group, a separate list of organised market places and a list of the standard contracts that each OMP offers would be preferable. Indeed, having separate data would be easier for us to consume this information as reference data, rather than interpolate from a list which could lead to mistakes.

Besides, we believe that the list must be updated on a regular basis, taking into an account new or inactivating old data at defined periodic intervals. A clear process - compliant with the Implementing Acts - must be defined for the treatment of any product which is not listed within the 'standard contracts' list (e.g. are they automatically assumed to be 'non-standard').

REPORTING OF STANDARD SUPPLY CONTRACTS

4) Please provide us with you views on the explanation of product, contract and transaction provided in this Chapter, in particular on whether the information is needed to facilitate transaction reporting

The EDF group welcomes the Agency's effort to provide some explanation as regards the notion of "product", "contract" and "transaction". However we believe that the provided definitions are quite confusing and sometimes used with no proper distinction all along the draft TRUM. We also noticed that these explanations were only provided under chapter 4 of the TRUM dealing with the "reporting of standard supply contracts". Therefore we wonder whether these definitions also apply for chapter 5 of the TRUM "reporting of non-standard supply contracts".

In our opinion the definitions provided in the TRUM seem be drawn up by a financial practice. Therefore, we doubt that these definitions would be fully understood by a compliance team and all staff with transaction reporting responsibilities. We also consider that these definitions may not be suitable with non-standard deals, especially those related to "contract" and "transaction". We thus believe that ACER needs to consult market participants in order to clarify these notions.

5) Please provide us with your views on the field guidelines for the reporting of transactions in standard supply contracts

General comments:

The EDF Group would support that separate chapters of the TRUM dealing with orders to trade, standard contracts and options to avoid any misunderstandings.

The EDF Group also believes that market participants would be interested to know which fields ACER expects to match. Will the reporting schedule include an explicit mention regarding these fields?

We would finally like to draw attention on the fact that there is today no way to report in the existing fields complex pricing formulas (index, baskets), including more than one index from different markets (power, transfer capacities, gas, oil, aluminium and other metals, different commodities, etc), price caps and other nonlinear mathematical function in their definition.

Data Field No (8) Beneficiary Identification

The Agency mentioned that *"the beneficiary identification concept may be different in REMIT compared to EMIR"*. We are not sure to understand to which differences the Agency refers to. Indeed, EMIR defines the beneficiary as *"the party subject to the rights and obligations arising from the contracts. Where the transaction is executed via a structure, such as trust or fund, representing a number of beneficiaries, the beneficiary should be identified as that structure. If the beneficiary of the contract is not a counterparty to this contract, the reporting counterparty has to identify this beneficiary by a unique code or, in case of individuals, by a client code as assigned by the legal entity used by the individual"*.

Data Field No (11) Buy/sell indicator

In the description it is mentioned that, in some cases, where order is neither buy nor sell, value "BS" should be reported, however this is not valid since reserved field length is just 1 character.

That aside, we are unsure under what conditions we would ever need to use the value 'BS', as the only case this may be apparent is for float/float physically settling swaps.

However, a physically settling float/float swap would normally be represented using two linked physical contracts (one buy and one sell).

Data Field No (12) Initiator/Aggressor

Suggest that the value 'Sleeve' be treated as a separate field. This is normally represented as two fields in ETRM systems (Initiator? and Sleeve?), so could potentially be less implementation effort to report as separate fields.

Data Field No (13) Order ID

We wonder how order ID could be unique by contract. Would it be more relevant to mention "by transaction" instead of "by contract"?



Data Field No (14) Order type and No (15) Order Condition

Fields 14 and 15 are for the most part in the concept of "commercial strategy" and should not be reported by market participants.

Data Field No (17) Minimum execution Volume

ACER is asking for the price and the quantity of the order which are, according to the EDF Group, reportable when the order closes and turns into a deal. However, we wonder about the case where the order is cancelled.

Data Field No (18) Undisclosed volume

If the volume is undisclosed what influence could this have on the market? We thus wonder why ACER need for such information. This is actually a figure that nobody knows and that does not affect anything.

Data Field No (22) Contract type

Should we have to consider that intraday and spot transactions fall under the "Forward style of contracts" type?

Wouldn't the value "SW-Financial exchange of contract cash flows (swap)" fall under the scope of EMIR? Suggest that this be renamed to "Swap style contracts", which could be used for reporting physically settling swaps (although these would normally be booked as linked physical contracts (one buy, one sell)).

4.5. Data fields related to details of the contract

This chapter refers to the data fields related to details of the transactions and not the contracts.

Data Field No (24) Transaction timestamp

For most non-standard contracts, we understood that ACER intends to have monthly physical deliveries reported as the executions of the contracts. Therefore, this field cannot be filled as such because these executions are automatic, without any event which date could be used to populate this field. As it will be linked to the month of delivery, the TRUM should establish a common rule for all market participants to populate this field, for example the first day of the month of physical delivery. Another solution could be to leave this field blank when reporting an automatic non standard contract execution.

Data Field No (25) Contract name

We consider this field a duplication of information due to the fact that the contract is uniquely identified in field 21.

Data Field No (26) Contract Trading Hours

We consider this field as unnecessary as this is not contract level information. This data would be better provided by the organised market places, and could then be extrapolated based on field 21.



Data Field No (28) Linked Transaction ID

For the execution of multi commodity non-standard contracts, where both counterparties can be buyer and seller, it should be precised that this field always refers to the non-standard contract ID and not to the related executions. For example, for an "Asset Based Contract" where counterparty A sells electricity to counterparty B and buys gas from Counterparty B, each reportable leg of the execution (electricity leg and gas leg) must refer to the non-standard contract ID and not to the UTI of one of the other legs.

Besides, Most deal capture systems do not allow you to link spread transactions which are booked separately and additional IT development and investment would needed to link these for reporting.

Data Field No (29) Linked Order ID

Not all deal capture systems would inherently capture and link market orders to transactions – as these are not required for trade lifecycle, P&L or risk processes. Additional IT development and investment would be needed to link these for reporting.

It should also be noted that there isn't always a simple 1-1 relationship between contracts and orders – as an order may be fulfilled by many contracts.

Data Field No (32) Price

It should be specified in the TRUM that the price of execution of non-standard contracts is only the variable commodity price as mentioned on the invoice, excluding all upfront or monthly payments executed in the frame of the contract.

Data Field No (33) Fixing Index

There are a large number of indices, and each participant is likely to utilise a different naming convention unless there is a standardised list. We would question the usefulness of a free text narrative which differs between participants. One suggestion may be to signify whether the contract is fix priced, index priced or priced through a formula/basket.

Data Field No (34) Index value

We wonder whether there is confusion between (i) the index value at the closing of the contract and (ii) the value of the index against which the deal will be remunerated. For example, if a contract is closed with a TTF index for February 2015, should we report the value of the closure date index or mention "0" as far as the value of the index will only be known later at the execution of the contract? Therefore, depending of the reporting option, the value of index could be systematically "0" until the execution of the contract.

Data Field No (36) Notional Value

If we refer to the comments of the Agency, the notional value (price*quantity) does not refer to the contract but to the transaction. We are also confused by the paragraph related to orders. We



understand that this field refers to the transaction value and not to the order value. These two notions may be different in practice.

Data Field No (37) Notional Currency

As far as we hardly see situation for standard contracts where the currency of the price is different from the currency of the notional value, we do not (?) understand the usefulness of this field.

Data Field No (41) Settlement Method

The method 'Optional for counterparty' isn't something that most deal capture systems would hold. Generally contracts are agreed to be either physically or financially settling. The only example we have seen (and this is rare) is where an option trade with two underlying binary options (one for cash settlement and the other for physical delivery).

Data Field No (42) Last trading date and time

We consider this field as unnecessary as this is not contract level information. This data would be better provided by the organised market places, and could then be extrapolated based on field 21.

Data Field No (51) Duration

We do not believe that this field provide any useful information over and above the period which can be interpolated from fields 49 and 50.

Data Field No (53) Days of the week

In order to provide a detailed delivery profile, the list should also include public holidays. However it should be noted that such may be difficult to implement for many market participants (depending on their IT system). This information could be better provided through the delivery profile shown in fields 54, 55 and 57.

Data Field No (54) Load Delivery Intervals

We are not sure why this is required given that the intervals are determined by the product, which has been uniquely identified in field 21.

Data Field No (58) Confirmation Timestamp

We are not sure why this is required for REMIT, and expect this field to nearly always be null when a contract is first reported.

Data Field No (59) Confirmation Means

We are not sure why this is required for REMIT, and expect this field to nearly always be null when a contract is first reported. In addition, many intra-day contracts are non-confirmable in the market, as they deliver before the standard confirmation timelines. A new 'non-confirmable' value would be needed to reflect these contract types.

- 6) Please provide us with your views on examples of transaction reporting listed in ANNEX III – Examples of transaction reporting of the draft TRUM. Do you consider the listed examples useful to facilitate transaction reporting?

We consider Annex III useful in order to visualise the data. We would hope that this annex be maintained and updated through future releases of the TRUM.

However, we have noticed that the examples have not been populated consistently with the field guidelines for the reporting of standard trades and should be carefully reviewed prior to releasing the final TRUM.

ACER should also make clear whether Annex III is for illustrative purposes only (providing some useful guidance on common traded products), or whether it seeks to provide a comprehensive catalogue of reportable traded products. ACER should also set up a clear procedure for cases where the transaction made is not mentioned in Annex III's examples of transaction reporting. Thus ACER should foresee a table with minimum requirements to be reported for contracts that do not fit in the trading scenarios.

We would like to raise a question against the document section called "Bilateral trades off-organised market places" within Annex III. Our understanding is that products traded bilaterally off-OMP are not considered standard supply contracts.

- 7) In your view, are there any additional examples to be added in ANNEX III on the draft TRUM? Please provide a description of example(s) that in your opinion should be covered.

N/A

REPORTING OF NON-STANDARD SUPPLY CONTRACTS

- 8) Please provide us with your views on the field guidelines for the reporting of transactions in non-standard supply contracts

The EDF Group welcomes this section that has been recently added to the TRUM. However, as mentioned previously, the EDF Group believes that an in depth work still needs to be carried out in order to have a workable TRUM for the reporting of non standard contracts.

Besides, we would very much welcome further clarification from ACER on which non-standard contracts should be reported via the standard form in order to allow for proper IT implementation.



We also think that the creation of a category "optional" might be useful. Thus, an item will be mandatory, optional or not required. The creation of certain minimum non-standard contract also should be considered (i.e. simple contracts to final consumer).

Finally, we consider that not all fields are applicable to electricity or gas and the division of the reporting fields regarding commodities should be put into consideration.

Comments on specific data fields

Data Field No (10) Buy/sell indicator

As "BS" is a possible value, the length of this field should be extended to 2 characters.

Data Field No (12) Contract Type

First, the EDF Group believes that this field needs to be completed with other type of contracts such as "supply to final customer", "purchase obligation", etc. This will have to be done in close cooperation with market participants.

Wouldn't the value 'SW-Financial exchange of contract cash flows (swap)' fall under the scope of EMIR? Suggest that this be renamed to 'Swap style contracts', which would be used for reporting physically settling swaps (although these would normally be booked as linked physical contracts (one buy, one sell)).

Data Field No (14) Contract ID

This field is not applicable for non-standard contracts.

Data Field No (15) Estimated Notional Amount

This field should be left blank for non-standard contracts for which total notional quantity is unknown at the time of the contract (see Data Field No 21). We agree that this field should be left blank when the price is not known at the closing of the contract, and we think it should be explicitly precised in the TRUM that it particularly concerns non standard contracts where calculation method refers to forward indexes or prices that are not published or not calculated at the time of the contract. Please see comment on fields (20) and (21) for what concerns optionality estimation.

Data Field No (17) Delivery Point Areas

This information may not be available in all cases, especially where an option holder is able to nominate where delivery will take place.

Data Field No (19) Delivery End Date

This field should be left blank for non-standard contracts for which the end date relies on a specific event that occurs rather than a fixed date at the time of the contract. For example, an Asset Based



Contract end date can refer to the decommissioning date of the underlying physical asset, without any precise date in the contract.

Data Field No (20) Volume Optionality

This field should be left blank when there is no optionality in the contract.

Data Field No (21) Total Notional Contract Quantity

This field should be left blank for non-standard contracts for which the quantity is unknown at the time of the contract. For example, Purchase Obligation contracts last 15 or 20 years and only mention a capacity. The quantity of electricity will depend on wind, sun, cogeneration of steam, etc., and cannot be estimated at the closing of the contract.

This is also the case of some Asset Based Contract for which the total contractual quantity cannot be estimated because the lifetime of the underlying physical asset is not known when signing the contract (see Data Field No 19).

For non-standard contracts with optional quantities, we would recommend the TRUM to provide clear guidance and on how to calculate the Total Notional Quantity. The simplest would be to adopt a calculation based on a theoretical full exercise of the optionality. For example, for a 5 years supply contract to a final customer who can withdraw from 100 MW to 200 MW with a custom load profile, the Total Notional Contract Quantity is calculated with a baseload profile at full possible capacity, i.e. $200 \text{ MW} \times 8760 \text{ h/year} \times 5 \text{ years} = 8,760,000 \text{ MWh}$.

Data Field No (22) Notional Quantity Unit

If Field (21) Total Notional Contract Quantity is blank, this field should also be left blank.

Data Field No (25) Volume Optionality intervals

The narrative for this field is a copy/paste error. A free text interval description is of questionable use, as each participant is likely to define their own naming conventions (e.g. March, March14, March2014, Mars, etc.)

Data Field No (26) Volume Optionality capacity

First, Field description probably does not match this field.

Besides, the unit of this capacity is not specified. It can be MW, MWh/d, MWh/h, Thm/d, Thm/h, etc. As there is no field in the IA to specify the unit of this field, it should be precised in the TRUM in which unit this capacity is expressed referring to other fields: for example the Notional Quantity Unit per hour (when this field is not blank) or the Notional Quantity Unit per Volume Optionality Frequency.

For many Long Term Contracts, this optionality capacity is defined as a complex percentage related to seasons, delivery points, monthly and annual cumulated quantities take or pay quantities ... and cannot be expressed as a simple figure. It should be specified in the TRUM that this field should be left blank in case of complex optionality.

Data Field No (28) Price or Price Formula

Some price formula might be too complex to be reported; therefore this field should be optional.

We question whether a price (number) and a formula name (string) should be contained within a common field.

We are also unclear of the usefulness of this field given that formulae will be representations of complex expressions unique to each participant. For example, a value of $((A+B)/C)*KW$ isn't meaningful without the term sheet. The formula will not detail averaging rules, listed observations, FX rules, rounding, precision, etc. One suggestion may be to signify whether the contract is fix priced, index priced or priced through a formula/basket.

Data Field No (29) Fixing Index

For non-standard contracts, it should be clearly specified in the TRUM that only published indexes related to electricity or gas have to be reported, as it is already specified in the Data Field No (13) Energy Commodity definition.

Including non-published indexes or published indexes related to commodities out of the scope of REMIT would significantly increase the complexity of REMIT reporting. For example, an Asset Based contract price calculation can refer to internal costs (operational variable costs, nuclear fuel management costs, etc.) or technical indexes related to the underlying asset. Another example is a supply contract to final customer which price calculation refers to indexes linked to the industrial process of the customer. For an Asset Based contract linked to a coal fueled power plant, which is very similar to a clean dark spread contract, coal and emission indexes should be explicitly excluded from REMIT reporting as it is specified in Data Field No (13) Energy Commodity definition. It should be the same for oil indexes (fuel oil, gas oil, Brent ...) used in Gas Long Term Contracts price calculation methods.

Data Field No (30) Fixing Index Types

It seems that ACER refers here to the type of contract/product rather than the type of index. We do not see in the table a proper field where to indicate the type of index (TTF, Brent ...). We wonder if ACER is asking here the same values as in the field 12.

Data Field No (31) Fixing index sources

We understand the reasoning for requesting this information, however we believe that by standardising the values within field 29 would better address this requirement. The fixing index should reference the source – otherwise the situation could arise where conflicting data is provided.

Data Field No (32) First Fixing Date

We believe that this field will not provide any significant value and can be interpolated through the contract duration and the frequency (fields 18, 19, 34). Fixings are normally based on calendar months - any deviations from this convention would not be picked up by taking only the first and last dates.



This field may be useful for identifying how any front 'stub' is treated on a swap, although this is quite a rare occurrence and is probably of limited value to ACER. This would typically be something that is validated during a bilateral confirmations process between the participants.

Data Field No (33) Last Fixing Date

We believe that this field will not provide any significant value and can be interpolated through the contract duration and the frequency (fields 18, 19, 34). Fixings are normally based on calendar months. Any deviations from this convention would not be picked up by taking only the first and last dates.

This field may be useful for identifying how any back 'stub' is treated on a swap, although this is quite a rare occurrence and is probably of limited value to ACER. This would typically be something that is validated during a bilateral confirmations process between the participants.

Data Field No (35) Settlement Method

The method 'O=Optional for counterparty' isn't something that most deal capture systems would hold. Generally contracts are agreed to be either physically or financially settling. The only example we have seen (and this is rare) is where an option trade with two underlying binary options (one for cash settlement and the other for physical delivery).

Data Field No (38) Option First Exercise Date

Format should contain day and hour. We would appreciate clarification from ACER that this field refers to the contractual exercise dates, not the ACTUAL dates upon which an option is exercised during the trade lifecycle.

Data Field No (39) Option Last Exercise Date

Format should contain day and hour. We would appreciate clarification from ACER that this field refers to the contractual exercise dates, not the ACTUAL dates upon which an option is exercised during the trade lifecycle.

Data Field No (41) Option Strike Index

There are a large number of indices, and each participant is likely to utilise a different naming convention unless there is a standardised list. We would question the usefulness of a free text narrative which differs between participants. One suggestion may be to signify whether the contract is fix priced, index priced or priced through a formula/basket.

Data Field No (42) Option Strike Index Type

We are unclear about what information this field is trying to convey. One suggestion may be to signify whether the contract is index priced or priced through a formula/basket.

Data Field No (43) Option strike index sources

We understand the reasoning for requesting this information, however we believe that by standardising the values within field 41 would better address this requirement. The index should reference the source – otherwise the situation could arise where conflicting data is provided.

- 9) Please provide us with your views on whether examples of transaction reporting should be added as regards transactions in non-standard supply contracts? If, yes please explain which scenarios these examples should cover.

The EDF Group is expecting a TRUM as detailed as this one for standard contracts at least 10 months before the non-standard reporting is due to commence for IT implementation reasons. The full details of the reporting requirements for non-standard contracts should cover examples in a similar fashion as what has been done for standard transactions.

The EDF Group believes that examples of transaction reporting should be added as regards transaction in non-standard supply contracts. We believe that ACER should foresee two main tools, the first one being the preparation of an extensive list of trading scenarios for non standardized contracts based on market participants' feedback. Then, given the fact that all scenarios cannot be covered ex-ante and that the market is a living space with new type of contracts regularly emerging, we believe that ACER should foresee one specific scenario enabling the reporting of "non-identified" contract with no mandatory fields (at least a minimum requirement reporting table). This would enable reporting entities putting their best efforts to report specific contracts that have not been identified in the scenarios.

Please refer to annex 1 for non exhaustive examples of contracts to be added.

REPORTING OF DERIVATIVES CONTRACTS

- 15) In your view, are Tables 1, 3 and 4 of Annex I of the draft Implementing Acts suited for the reporting o contracts referred to in Article 3(1)(a)(ix) and 3(1)(b)(3) respectively?

The EDF Group would like to highlight that a number of the fields, particularly around unpriced contracts, are free-text, so the contents will vary between participants, even though they are referring to the same thing. Looking to standardise such fields would potentially increase the value of this data.

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ANNEX I

Examples of transaction reporting as regards transactions in non-standard supply contract

Example n. 1.a : Purchase obligation / feed-in contracts

This example shows how to report a purchase obligation / feed-in tariffs contract above 10 MW, i.e. regulated contracts for the physical delivery of electricity by a single production unit with a capacity greater than 10 MW or by production units greater than 10 MW. The information reported below aims to show what buyers and sellers have to report to the Agency for this particular type of transaction.

Transaction reporting type:	Non-standard contract
Contract type:	Purchase obligation
Energy commodity:	Electricity

All fields reported below are **mandatory** for this type of contracts or execution. Fields that are blank are **not required** to be reported for this type of transaction.

Field Number	Field	MP1	MP2
		Parties to the contract	
1	ID of the market participant or counterparty	1234567890	0987654321
2	Type of code used in field 1	LEI	ACE
3	ID of the other market participant or counterparty	0987654321	1234567890
4	Type of code used in 3	ACE	LEI
5	Reporting entity ID	9999RRM	9999RRM
6	Type of code used in 5	LEI	LEI
7	Beneficiary Identification		
8	Type of code used in 7		
9	Trading capacity of the market participant or counterparty in field 1		
10	Buy/sell indicator	B	S
		Details of the Contract	
11	Contract Date	2010-01-28	2010-01-28
12	Contract Type	Purchase obligation	Purchase obligation
13	Energy Commodity	EL	EL
14	Contract ID	PurObl0001	PurObl0001
15	Estimated Notional Amount		
16	Notional Currency		
		Delivery Profile	
17	Delivery point areas	10Y1001A1001A008	10Y1001A1001A008
18	Delivery Start Date	2010-07-01	2010-07-01
19	Delivery End Date	2025-06-30	2025-06-30
20	Volume Optionality		
21	Total Notional Contract Quantity		
22	Notional Quantity Unit		
23	Volume Optionality Frequency		
24	Load Type	Other	Other
25	Volume Optionality Intervals		



26	Volume Optionality capacity		
27	Type of Index Price		
28	Price or Price Formula		
29	Fixing Index		
30	Fixing Index Types		
31	Fixing Index Sources		
32	First Fixing Date		
33	Last Fixing Date		
34	Fixing Frequency		
35	Settlement Method	P	P
		Options	
36	Exercise Style		
37	Option Type		
38	Option First Exercise Date		
39	Option Last Exercise Date		
40	Option Exercise Frequency		
41	Option Strike Index		
42	Option Strike Index Type		
43	Option Strike Index Source		
44	Option Strike price		
		Life cycle information	
45	Action type	N	N

Example n. 1.b : Purchase obligation / feed-in contracts

This example shows how to report a purchase obligation / feed-in tariffs contract “execution” above 10 MW, i.e. regulated contracts for the physical delivery of electricity by a single production unit with a capacity greater than 10 MW or by production units greater than 10 MW. The information reported below aims to show what buyers and sellers have to report to the Agency for this particular type of transaction.

Transaction reporting type: Execution of non-standard contract
 Contract type: Purchase obligation
 Energy commodity: Electricity

All fields reported below are mandatory for this type of contracts or execution. Fields that are blank are not required to be reported for this type of transaction.

Field No.	Field Identifier	MP1	MP2
	Parties to the contract		
1	ID of the market participant or counterparty	1234567890	0987654321
2	Type of code used in field 1	LEI	ACE
3	Trader ID as identified by the organised market place and/or for the market participant or counterparty.		
4	ID of the other market participant or counterparty	0987654321	1234567890
5	Type of code used in 4	ACE	LEI
6	Reporting entity ID	9999RRM	9999RRM
7	Type of code used in 6	LEI	LEI
8	Beneficiary Identification		
9	Type of code used in field 8		
10	Trading capacity of the market participant or counterparty in field 1		
11	Buy/sell indicator	B	S
12	Initiator/Aggressor		
	Order details		
13	Order ID		
14	Order type		
15	Order Condition		
16	Order Status		
17	Minimum Execution Volume		
18	Price Limit		
19	Undisclosed Volume		
20	Order Duration		
	Contract type		
21	Contract ID		
22	Contract type		
23	Energy Commodity		
	Contract details		
24	Transaction timestamp	2014-08-01T00:00:00.000Z	2014-08-01T00:00:00.000Z
25	Contract Name		
26	Contract Trading Hours		
27	Unique Transaction Identification	1234567890abcdefrgf	1234567890abcdefrgf

28	Linked Transaction ID	PurObl0001	PurObl0001
29	Linked Order ID		
30	Organised market place identification/OTC		
31	Voice-brokered		
32	Price	350	350
33	Fixing Index		
34	Index Value		
35	Price currency	EUR	EUR
36	Notional amount		
37	Notional Currency		
38	Quantity /Volume	2400	2400
39	Total Notional Contract Quantity		
40	Quantity unit for field 38 and 39	MWh	MWh
41	Settlement method	P	P
42	Last trading date and time		
43	Termination date		
	Option details		
44	Option style		
45	Option type		
46	Option Exercise date		
47	Option Strike price		
	Delivery profile		
48	Delivery point or zone	10Y1001A1001A008	10Y1001A1001A008
49	Delivery Start Date	2014-08-01	2014-08-01
50	Delivery End Date	2014-08-31	2014-08-31
51	Duration		
52	Load type		
53	Days of the week		
54	Load Delivery Intervals		
55	Delivery capacity		
56	Quantity Unit for 55		
57	Price/time interval quantity		
	Confirmation		
58	Confirmation timestamp		
59	Confirmation means		
	Lifecycle information		
60	Action type	N	N

Example n. 2.a : Supply contract to final customers

This example shows how to report a supply contract to final customers, i.e. contracts of 600 GWh/year or more for the supply of electricity for the use of final customers [art. 3(a)(7) IA] and contracts for the supply of electricity or natural gas to a single consumption unit with a technical capacity to consume 600 GWh/year or more [art. 3(a)(8) IA]. The information reported below aims to show what buyers and sellers have to report to the Agency for this particular type of transaction.

This example is a fictive contract that includes many features of several contracts usually managed by UFE members

- *Counterparty A sells electricity on the French grid to counterparty B up to 190 MW, the load profile depends on B's industrial process*
- *Upfront payments made before the first delivery and monthly fixed payments or repayments are not directly linked to physical deliveries and are therefore excluded from REMIT reporting*
- *Counterparty B has an optional capacity of 10 MW and can withdraw on request up to 200 MW*

Transaction reporting type: **Non-standard contract**
 Contract type: **Supply to final customer**
 Energy commodity: **Electricity**

All fields reported below are **mandatory** for this type of contracts or execution. Fields that are blank are **not required** to be reported for this type of transaction.

Field Number	Field	MP1	MP2
		Parties to the contract	
1	ID of the market participant or counterparty	1234567890	0987654321
2	Type of code used in field 1	LEI	ACE
3	ID of the other market participant or counterparty	0987654321	1234567890
4	Type of code used in 3	ACE	LEI
5	Reporting entity ID	9999RRM	9999RRM
6	Type of code used in 5	LEI	LEI
7	Beneficiary Identification		
8	Type of code used in 7		
9	Trading capacity of the market participant or counterparty in field 1		
10	Buy/sell indicator	S	B
		Details of the Contract	
11	Contract Date	2010-03-15	2010-03-15
12	Contract Type	Supply to final customer	Supply to final customer
13	Energy Commodity	EL	EL
14	Contract ID	FinCust0001	FinCust0001
15	Estimated Notional Amount		
16	Notional Currency		
		Delivery Profile	
17	Delivery point areas	10Y1001A1001A008	10Y1001A1001A008
18	Delivery Start Date	2010-07-01	2010-07-01
19	Delivery End Date	2015-06-30	2015-06-30
20	Volume Optionality	C	C
21	Total Notional Contract Quantity		
22	Notional Quantity Unit		
23	Volume Optionality Frequency		
24	Load Type		
25	Volume Optionality Intervals		



26	Volume Optionality capacity		
27	Type of Index Price	C	C
28	Price or Price Formula		
29	Fixing Index		
30	Fixing Index Types		
31	Fixing Index Sources		
32	First Fixing Date		
33	Last Fixing Date		
34	Fixing Frequency		
35	Settlement Method	P	P
		Options	
36	Exercise Style		
37	Option Type		
38	Option First Exercise Date		
39	Option Last Exercise Date		
40	Option Exercise Frequency		
41	Option Strike Index		
42	Option Strike Index Type		
43	Option Strike Index Source		
44	Option Strike price		
		Life cycle information	
45	Action type	N	N

Example n. 2.b.: Supply contract to final customers

This example shows how to report a supply contract “execution” to final customers, i.e. contracts of 600 GWh/year or more for the supply of electricity for the use of final customers [art. 3(a)(7) IA] and contracts for the supply of electricity or natural gas to a single consumption unit with a technical capacity to consume 600 GWh/year or more [art. 3(a)(8) IA]. The information reported below aims to show what buyers and sellers have to report to the Agency for this particular type of transaction.

Transaction reporting type:	Execution of non-standard contract
Contract type:	Supply to final customer
Energy commodity:	Electricity

All fields reported below are mandatory for this type of contracts or execution. Fields that are blank are not required to be reported for this type of transaction.

Field No.	Field Identifier	MP1	MP2
	Parties to the contract		
1	ID of the market participant or counterparty	1234567890	0987654321
2	Type of code used in field 1	LEI	ACE
3	Trader ID as identified by the organised market place and/or for the market participant or counterparty.		
4	ID of the other market participant or counterparty	0987654321	1234567890
5	Type of code used in 4	ACE	LEI
6	Reporting entity ID	9999RRM	9999RRM
7	Type of code used in 6	LEI	LEI
8	Beneficiary Identification		
9	Type of code used in field 8		
10	Trading capacity of the market participant or counterparty in field 1		
11	Buy/sell indicator	S	B
12	Initiator/Aggressor		
	Order details		
13	Order ID		
14	Order type		
15	Order Condition		
16	Order Status		
17	Minimum Execution Volume		
18	Price Limit		
19	Undisclosed Volume		
20	Order Duration		
	Contract type		
21	Contract ID		
22	Contract type		
23	Energy Commodity		
	Contract details		
24	Transaction timestamp	2014-08-01T00:00:00.000Z	2014-08-01T00:00:00.000Z
25	Contract Name		
26	Contract Trading Hours		

27	Unique Transaction Identification	1234567890abcdefrgf	1234567890abcdefrgf
28	Linked Transaction ID	FinCust0001	FinCust0001
29	Linked Order ID		
30	Organised market place identification/OTC		
31	Voice-brokered		
32	Price	50	50
33	Fixing Index		
34	Index Value		
35	Price currency	EUR	EUR
36	Notional amount		
37	Notional Currency		
38	Quantity /Volume	144000	144000
39	Total Notional Contract Quantity		
40	Quantity unit for field 38 and 39	MWh	MWh
41	Settlement method	P	P
42	Last trading date and time		
43	Termination date		
	Option details		
44	Option style		
45	Option type		
46	Option Exercise date		
47	Option Strike price		
	Delivery profile		
48	Delivery point or zone	10Y1001A1001A008	10Y1001A1001A008
49	Delivery Start Date	2014-08-01	2014-08-01
50	Delivery End Date	2014-08-31	2014-08-31
51	Duration		
52	Load type		
53	Days of the week		
54	Load Delivery Intervals		
55	Delivery capacity		
56	Quantity Unit for 55		
57	Price/time interval quantity		
	Confirmation		
58	Confirmation timestamp		
59	Confirmation means		
	Lifecycle information		
60	Action type	N	N

Example n. 3.a: Common long term contract

This example shows how to report a common long term contract, i.e. contract for which the delivery period is longer than two days and a delivery point in Europe [art. 3(a)(7) IA]. It includes supply contracts under regulated tariff (e.g. supply to local distribution companies). The information reported below aims to show what buyers and sellers have to report to the Agency for this particular type of transaction.

This example is a fictive contract that includes many features of several contracts usually managed by UFE members

- *A counterparty A sells a commodity (natural gas in this example) to a counterparty B, within an agreement that includes the obligation for B to withdraw a minimum monthly volume (take or pay clause), optional volumes at the hand of B, and multiple delivery points*
- *The flexibility frequency at the hand of B is daily, it depends on several factors like seasons, monthly volumes, cumulated volumes, etc. and can be seen as an annual swing option*
- *The price formula is based on public indexes : Brent prices, fuel oil prices, gas oil prices, fx rate, natural gas prices*

Transaction reporting type:	Non-standard contract
Contract type:	Common long term contract
Energy commodity:	Gas

All fields reported below are **mandatory** for this type of contracts or execution. Fields that are blank are **not required** to be reported for this type of transaction.

Field Number	Field	MP1	MP2
		Parties to the contract	
1	ID of the market participant or counterparty	1234567890	0987654321
2	Type of code used in field 1	LEI	LEI
3	ID of the other market participant or counterparty	0987654321	1234567890
4	Type of code used in 3	LEI	LEI
5	Reporting entity ID	9999RRM	9999RRM
6	Type of code used in 5	LEI	LEI
7	Beneficiary Identification		
8	Type of code used in 7		
9	Trading capacity of the market participant or counterparty in field 1		
10	Buy/sell indicator	B	S
		Details of the Contract	
11	Contract Date	2008-07-18	2008-07-18
12	Contract Type	Long term contract	Long term contract
13	Energy Commodity	NG	NG
14	Contract ID	LTC0001	LTC0001
15	Estimated Notional Amount		
16	Notional Currency		
		Delivery Profile	
17	Delivery point areas	21YPNT-EX-GAS-NT, 21YBE----ZBT---F	21YPNT-EX-GAS-NT, 21YBE----ZBT---F
18	Delivery Start Date	2010-04-01	2010-04-01
19	Delivery End Date	2025-03-31	2015-03-31
20	Volume Optionality	C	C
21	Total Notional Contract Quantity	15,000,000	15,000,000
22	Notional Quantity Unit	MWh	MWh
23	Volume Optionality Frequency	D	D

24	Load Type	G	G
25	Volume Optionality Intervals	2010-04-01 – 2011-03-31 2011-04-01 – 2012-03-31 2012-04-01 – 2013-03-31 2013-04-01 – 2014-03-31 2014-04-01 – 2025-03-31	2010-04-01 – 2011-03-31 2011-04-01 – 2012-03-31 2012-04-01 – 2013-03-31 2013-04-01 – 2014-03-31 2014-04-01 – 2025-03-31
26	Volume Optionality capacity		
27	Type of Index Price	C	C
28	Price or Price Formula		
29	Fixing Index	Heren Zeebrugge day-ahead, Heren Zeebrugge weekend	Heren Zeebrugge day-ahead, Heren Zeebrugge weekend
30	Fixing Index Types	DAH, WEEKEND	DAH, WEEKEND
31	Fixing Index Sources	ICIS Heren ESGM	ICIS Heren ESGM
32	First Fixing Date	2010-04-01	2010-04-01
33	Last Fixing Date	2025-03-31	2025-03-31
34	Fixing Frequency	D	D
35	Settlement Method	P	P
		Options	
36	Exercise Style		
37	Option Type		
38	Option First Exercise Date		
39	Option Last Exercise Date		
40	Option Exercise Frequency		
41	Option Strike Index		
42	Option Strike Index Type		
43	Option Strike Index Source		
44	Option Strike price		
		Life cycle information	
45	Action type	N	N

Example n. 3.b: Common long term contract

This example shows how to report a common long term contract “execution”, i.e. contract without options for which the delivery period is longer than two days and a delivery point in Europe [art. 3(a)(7) IA]. It includes supply contracts under regulated tariff (e.g. supply to local distribution companies). The information reported below aims to show what buyers and sellers have to report to the Agency for this particular type of transaction.

Transaction reporting type:	Execution of non-standard contract
Contract type:	Common long term contract
Energy commodity:	Gas

All fields reported below are mandatory for this type of contracts or execution. Fields that are blank are not required to be reported for this type of transaction.

Field No.	Field Identifier	MP1	MP2
	Parties to the contract		
1	ID of the market participant or counterparty	1234567890	0987654321
2	Type of code used in field 1	LEI	LEI
3	Trader ID as identified by the organised market place and/or for the market participant or counterparty.		
4	ID of the other market participant or counterparty	0987654321	1234567890
5	Type of code used in 4	LEI	LEI
6	Reporting entity ID	9999RRM	9999RRM
7	Type of code used in 6	LEI	LEI
8	Beneficiary Identification		
9	Type of code used in field 8		
10	Trading capacity of the market participant or counterparty in field 1		
11	Buy/sell indicator	B	S
12	Initiator/Aggressor		
	Order details		
13	Order ID		
14	Order type		
15	Order Condition		
16	Order Status		
17	Minimum Execution Volume		
18	Price Limit		
19	Undisclosed Volume		
20	Order Duration		
	Contract type		
21	Contract ID		
22	Contract type		
23	Energy Commodity		
	Contract details		
24	Transaction timestamp	2014-08-01T00:00:00.000Z	2014-08-01T00:00:00.000Z
25	Contract Name		
26	Contract Trading Hours		
27	Unique Transaction Identification	1234567890abcdefrgf	1234567890abcdefrgf

28	Linked Transaction ID	LTC0001	LTC0001
29	Linked Order ID		
30	Organised market place identification/OTC		
31	Voice-brokered		
32	Price	28	28
33	Fixing Index		
34	Index Value		
35	Price currency	EUR	EUR
36	Notional amount		
37	Notional Currency		
38	Quantity /Volume	872540	872540
39	Total Notional Contract Quantity		
40	Quantity unit for field 38 and 39	MWh	MWh
41	Settlement method	P	P
42	Last trading date and time		
43	Termination date		
	Option details		
44	Option style		
45	Option type		
46	Option Exercise date		
47	Option Strike price		
	Delivery profile		
48	Delivery point or zone	21YPNT-EX-GAS-NT, 21YBE----ZBT---F	21YPNT-EX-GAS-NT, 21YBE----ZBT---F
49	Delivery Start Date	2014-08-01	2014-08-01
50	Delivery End Date	2014-08-31	2014-08-31
51	Duration		
52	Load type		
53	Days of the week		
54	Load Delivery Intervals		
55	Delivery capacity		
56	Quantity Unit for 55		
57	Price/time interval quantity		
	Confirmation		
58	Confirmation timestamp		
59	Confirmation means		
	Lifecycle information		
60	Action type	N	N



Example n. 4.a: Asset based long term contract

I must be wrong but my interpretation would be :

- Not report a monthly transaction
- Just make two separate report for A and B

This example shows how to report a common asset based contract, for which the delivery period is longer than two days and a delivery point in Europe. The information reported below aims to show what buyers and sellers have to report to the Agency for this particular type of transaction.

This example is a fictive contract that includes many features of several contracts managed by UFE members

- *Counterparties A and B share two power plants costs, one owned by A in an European country and the other one owned by B in another European country ; the contract gives to each counterparty physical withdrawal rights in other counterparty's plant*
- *Several costs are not directly linked to physical deliveries and are therefore excluded from REMIT reporting : upfront payments before the beginning of the first deliveries and monthly fixed costs*
- *Counterparty A has a daily drawing right from 0 to 200 MW, the commodity price is a variable cost proportional to B production cost of each MWh (mainly fuel costs)*
- *Counterparty B has an energy right from 150 to 200 MW : B pays a monthly quota share of the total production costs of A's plant no matter which electricity quantities are withdrawn by B, and there's no commodity price invoiced for the physical deliveries to B.*
- *Physical volumes can be (i) fixed in energy, (ii) fixed in capacity or (iii) flexible in a range of two values (for example from 0 to 200 MW). In such case the optionality on volumes can be exercised by either A (call) and/or B (put) on a daily basis, within specific limits, depending on the contract*
- *The end date of the contract is linked to the decommissioning of the power plants and is unknown at the time of the contract*

Transaction reporting type:	Non-standard contract reporting
Contract type:	Asset based long term contract
Energy commodity:	Electricity

All fields reported below are mandatory for this type of contracts or execution. Fields that are blank are not required to be reported for this type of transaction.

Field Number	Field	MP1	MP2
		Parties to the contract	
1	ID of the market participant or counterparty	1234567890	0987654321
2	Type of code used in field 1	LEI	LEI
3	ID of the other market participant or counterparty	0987654321	1234567890
4	Type of code used in 3	LEI	LEI
5	Reporting entity ID	9999RRM	9999RRM
6	Type of code used in 5	LEI	LEI
7	Beneficiary Identification		
8	Type of code used in 7		
9	Trading capacity of the market participant or counterparty in field 1		
10	Buy/sell indicator	BS	BS
		Details of the Contract	
11	Contract Date	1992-03-15	1992-03-15
12	Contract Type	Asset based LTC	Asset based LTC
13	Energy Commodity	EL	EL
14	Contract ID	LTC0002	LTC0002

15	Estimated Notional Amount		
16	Notional Currency		
		Delivery Profile	
17	Delivery point areas	10Y1001A1001A008	10Y1001A1001A008
18	Delivery Start Date	1998-01-01	1998-01-01
19	Delivery End Date		
20	Volume Optionality	C	C
21	Total Notional Contract Quantity		
22	Notional Quantity Unit		
23	Volume Optionality Frequency	D	D
24	Load Type	Other	Other
25	Volume Optionality Intervals	Jan-Dec	Jan-Dec
26	Volume Optionality capacity	200 50	200 50
27	Type of Index Price		
28	Price or Price Formula		
29	Fixing Index		
30	Fixing Index Types		
31	Fixing Index Sources		
32	First Fixing Date		
33	Last Fixing Date		
34	Fixing Frequency		
35	Settlement Method	P	P
		Options	
36	Exercise Style		
37	Option Type		
38	Option First Exercise Date		
39	Option Last Exercise Date		
40	Option Exercise Frequency		
41	Option Strike Index		
42	Option Strike Index Type		
43	Option Strike Index Source		
44	Option Strike price		
		Life cycle information	
45	Action type	N	N

Example n. 4.b.: Asset based long term contract

This example shows how to report a common asset based contract "execution", for which the delivery period is longer than two days and a delivery point in Europe. The information reported below aims to show what buyers and sellers have to report to the Agency for this particular type of transaction.

Transaction reporting type:	Execution of non-standard contract
Contract type :	Asset based long term contract
Energy commodity:	Electricity

All fields reported below are mandatory for this type of contracts or execution. Fields that are blank are not required to be reported for this type of transaction.

Execution of counterparty A capacity right

Field No.	Field Identifier	MP1	MP2
	Parties to the contract		
1	ID of the market participant or counterparty	1234567890	0987654321
2	Type of code used in field 1	LEI	LEI
3	Trader ID as identified by the organised market place and/or for the market participant or counterparty.		
4	ID of the other market participant or counterparty	0987654321	1234567890
5	Type of code used in 4	LEI	LEI
6	Reporting entity ID	9999RRM	9999RRM
7	Type of code used in 6	LEI	LEI
8	Beneficiary Identification		
9	Type of code used in field 8		
10	Trading capacity of the market participant or counterparty in field 1		
11	Buy/sell indicator	B	S
12	Initiator/Aggressor		
	Order details		
13	Order ID		
14	Order type		
15	Order Condition		
16	Order Status		
17	Minimum Execution Volume		
18	Price Limit		
19	Undisclosed Volume		
20	Order Duration		
	Contract type		
21	Contract ID		
22	Contract type		
23	Energy Commodity		
	Contract details		
24	Transaction timestamp	2014-08-01T00:00:00.000Z	2014-08-01T00:00:00.000Z
25	Contract Name		
26	Contract Trading Hours		
27	Unique Transaction Identification	1234567890abcdefrgf	1234567890abcdefrgf
28	Linked Transaction ID	LTC0002	LTC0002

29	Linked Order ID		
30	Organised market place identification/OTC		
31	Voice-brokered		
32	Price	15	15
33	Fixing Index		
34	Index Value		
35	Price currency	EUR	EUR
36	Notional amount		
37	Notional Currency		
38	Quantity /Volume	93600	93600
39	Total Notional Contract Quantity		
40	Quantity unit for field 38 and 39	MWh	MWh
41	Settlement method	P	P
42	Last trading date and time		
43	Termination date		
	Option details		
44	Option style		
45	Option type		
46	Option Exercise date		
47	Option Strike price		
	Delivery profile		
48	Delivery point or zone	10Y1001A1001A008	10Y1001A1001A008
49	Delivery Start Date	2014-08-01	2014-08-01
50	Delivery End Date	2014-08-31	2014-08-31
51	Duration		
52	Load type		
53	Days of the week		
54	Load Delivery Intervals		
55	Delivery capacity		
56	Quantity Unit for 55		
57	Price/time interval quantity		
	Confirmation		
58	Confirmation timestamp		
59	Confirmation means		
	Lifecycle information		
60	Action type	N	N

Execution of counterparty B energy right

Field No.	Field Identifier	MP1	MP2
	Parties to the contract		
1	ID of the market participant or counterparty	1234567890	0987654321
2	Type of code used in field 1	LEI	LEI
3	Trader ID as identified by the organised market place and/or for the market participant or counterparty.		
4	ID of the other market participant or counterparty	0987654321	1234567890
5	Type of code used in 4	LEI	LEI
6	Reporting entity ID	9999RRM	9999RRM

7	Type of code used in 6	LEI	LEI
8	Beneficiary Identification		
9	Type of code used in field 8		
10	Trading capacity of the market participant or counterparty in field 1		
11	Buy/sell indicator	S	B
12	Initiator/Aggressor		
	Order details		
13	Order ID		
14	Order type		
15	Order Condition		
16	Order Status		
17	Minimum Execution Volume		
18	Price Limit		
19	Undisclosed Volume		
20	Order Duration		
	Contract type		
21	Contract ID		
22	Contract type		
23	Energy Commodity		
	Contract details		
24	Transaction timestamp	2014-08-01T00:00:00.000Z	2014-08-01T00:00:00.000Z
25	Contract Name		
26	Contract Trading Hours		
27	Unique Transaction Identification	1234567890abcdefrgh	1234567890abcdefrgh
28	Linked Transaction ID	LTC0002	LTC0002
29	Linked Order ID		
30	Organised market place identification/OTC		
31	Voice-brokered		
32	Price	0	0
33	Fixing Index		
34	Index Value		
35	Price currency	EUR	EUR
36	Notional amount		
37	Notional Currency		
38	Quantity /Volume	148800	148800
39	Total Notional Contract Quantity		
40	Quantity unit for field 38 and 39	MWh	MWh
41	Settlement method	P	P
42	Last trading date and time		
43	Termination date		
	Option details		
44	Option style		
45	Option type		
46	Option Exercise date		
47	Option Strike price		
	Delivery profile		
48	Delivery point or zone	10Y1001A1001A008	10Y1001A1001A008
49	Delivery Start Date	2014-08-01	2014-08-01
50	Delivery End Date	2014-08-31	2014-08-31



51	Duration		
52	Load type		
53	Days of the week		
54	Load Delivery Intervals		
55	Delivery capacity		
56	Quantity Unit for 55		
57	Price/time interval quantity		
	Confirmation		
58	Confirmation timestamp		
59	Confirmation means		
	Lifecycle information		
60	Action type	N	N

Example n. 5.a.: "ARENH" contracts

This example shows how to report "ARENH" contract, i.e. contract for regulated access to baseload nuclear electricity at a regulated price based in force in France. The information reported below aims to show what buyers and sellers have to report to the Agency for this particular type of transaction.

According to the French law, new entrants may have an access to baseload nuclear electricity at a regulated price based on the current full costs of existing nuclear plants. The rights of new entrants to get energy on this regulated basis are defined on the base of the final customers' portfolio, with a possible ex-post adjustment. Therefore, EDF competitors have access to approximately 25% of the electricity produced by EDF historical nuclear plants.

Each of these suppliers has a general agreement with EDF, but in order to protect the confidential data related to customer portfolios, EDF only receives from the NRA (CRE), based on the volumes that he allocated to each counterparty, the total monthly volumes that will be nominated on the French network by all the ARENH counterparties

⇒ Only one of the two counterparties is able to report the full details of the contract and its execution. For competition legal purposes, the central counterparty to all contracts is not allowed to have a complete knowledge of the detailed deliveries.

Transaction reporting type: **Non-standard contract reporting**
 Contract type: **ARENH contract**
 Energy commodity: **Electricity**

All fields reported below are **mandatory** for this type of contracts or execution. Fields that are blank are **not required** to be reported for this type of transaction.

Field Number	Field	MP1	MP2
		Parties to the contract	
1	ID of the market participant or counterparty	1234567890	0987654321
2	Type of code used in field 1	LEI	LEI
3	ID of the other market participant or counterparty	0987654321	1234567890
4	Type of code used in 3	LEI	LEI
5	Reporting entity ID	9999RRM	9999RRM
6	Type of code used in 5	LEI	LEI
7	Beneficiary Identification		
8	Type of code used in 7		
9	Trading capacity of the market participant or counterparty in field 1		
10	Buy/sell indicator	S	B
		Details of the Contract	
11	Contract Date	2013-03-15	2013-03-15
12	Contract Type	ARENH	ARENH
13	Energy Commodity	EL	EL
14	Contract ID	ARENH0001	ARENH0001
15	Estimated Notional Amount		
16	Notional Currency		
		Delivery Profile	
17	Delivery point areas	10Y1001A1001A008	10Y1001A1001A008
18	Delivery Start Date		
19	Delivery End Date		
20	Volume Optionality		
21	Total Notional Contract Quantity		
22	Notional Quantity Unit		

23	Volume Optionality Frequency		
24	Load Type	Baseload	Baseload
25	Volume Optionality Intervals		
26	Volume Optionality capacity		
27	Type of Index Price		
28	Price or Price Formula		
29	Fixing Index		
30	Fixing Index Types		
31	Fixing Index Sources		
32	First Fixing Date		
33	Last Fixing Date		
34	Fixing Frequency		
35	Settlement Method	P	P
		Options	
36	Exercise Style		
37	Option Type		
38	Option First Exercise Date		
39	Option Last Exercise Date		
40	Option Exercise Frequency		
41	Option Strike Index		
42	Option Strike Index Type		
43	Option Strike Index Source		
44	Option Strike price		
		Life cycle information	
45	Action type	N	N

Details on the contract and on its executions are unknown to the central counterparty, due to restricted access imposed by French law.

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