



ACER

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Onderwerp

OPENBAAR

GasTerra response to ACER consultation common schema inside information

Dear Sir, Madam,

With reference to the public consultation (PC_2015_R_03) regarding the proposed common schema for the disclosure of inside information, GasTerra B.V. (hereafter: 'GasTerra') hereby would like to give its opinion.

In the Consultation Letter parties are invited to answer four questions. Below the answers of GasTerra to each of the questions can be found. GasTerra in general would like to point out that an overload of mandatory fields for which data has to be collected and verified may well lead to a delay in the moment of publication. As such, this may not be beneficial to the goal of real time transparency.

Box 1

1. **Would you add any other field not included in the current proposal? If so, please explain your reasoning.**

No.

2. **Would you remove any field represented in the current proposal? If so, please explain your reasoning.**

Field 9b Balancing zone (gas capacity)

GasTerra sees no added value in the field, because in field 7b already the affected point needs to be published.

Field 11b Available capacity

This field should be left out, because it is a market parties own strategy to decide what to do with the remaining capacity. Furthermore, whether there is a direct impact on the price depends primarily on the available capacities elsewhere in the market.

Field 12b Nominal capacity

Referring to our comment to field 11b GasTerra would like to point out that the nominal capacity of an asset is even less relevant to assess the possible impact on market prices.

Field 15 Event start

This field should be left out, because it may lead to speculation.

Field 16 Event stop

This field should be left out, because it may lead to speculation.

Field 17 Remarks

This field should be left out, because it may lead to speculation.

Field 20 Impact on carbon permit prices

This field is not required according to REMIT, so this field should be left out. Keeping it in the common schema as an 'optional' field though, is a good alternative for market parties who have to comply with MAR requirements.

3. **Would you change any of the descriptions, accepted values or applicability? If so, please explain your reasoning. Are the schemas or values that you are suggesting based on any industry standard? Which one(s)?**

Field 4b Message type (gas capacity)

The value 'import contract curtailment' should be deleted. In order to avoid arriving at a situation whereby market participants are obliged to disclose contractual information, against which GasTerra strongly opposes, TSOs are best placed to publish info on the use of the transportation facilities, which would reflect possible curtailments through changed nomination programs.

Field 14 Decision Time

REMIT requires timely disclosure of inside information. Acer prefers real time or close to real time disclosure. Therefore, this field and field 13, publication time, should normally have the same date and time. This field would only be required in cases of exceptional delayed disclosure according to article 4-2 REMIT.

Furthermore, this field is not relevant in case of unplanned unavailability, so this field seems only applicable to planned unavailability.

Box 2

4. **Do you agree with the use of RSS or ATOM feeds to fulfil the requirement under Article 10(1) of the REMIT Implementing Regulation?**

Yes, we agree.

If you require any further information, please contact [REDACTED] via telephone number [REDACTED] or via e-mail [REDACTED]

Yours sincerely,

[REDACTED]
[REDACTED]