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#### **REMIT: Common Schema for the Disclosure of Inside Information – Public Consultation**

As a market participant, SSE welcomes the opportunity to comment on ACER's proposals to further enhance current practises for the disclosure of inside information. Please find our responses to the consultation questions below.

If you would like to discuss any aspect of our response in more detail do not hesitate to contact me.

Yours sincerely



## Consultation questions

### **1. Would you add any other field not included in the current proposal?**

We do not consider that any other fields are required.

### **2. Would you remove any field represented in the current proposal?**

We do consider that some fields are unnecessary and could be removed. We believe that these fields add no benefit for market participants who rely on the information and their removal would not result in any negative effects. We are also concerned about the size of the tables which will need to be displayed on websites if multiple additional fields need to be included.

We consider that the following fields should be removed from the current proposals:

Nominal capacity (gas and electricity) - This information is easily derived from the already published available capacity and unavailable capacity and is therefore not required.

Decision times (gas and electricity) – We don't see what benefit this information is to other market participants. The overarching requirement on market participants is to ensure they disclose the information in a timely manner (and where applicable within the 1 hour timeframe stipulated in the ACER guidance). This timely disclosure in itself is to the benefit of market participants and we see no additional benefit to publically confirming that this information has been disclosed within a certain timeframe.

Market participant (gas and electricity) – We do not see what benefit this information is to other market participants, who will be focussed solely on particular assets and their impact on the market.

Impact on emission allowance prices (gas and electricity) - We would like confirmation from ACER that the publication of this information on a corporate website or a regional REMIT transparency platform would in fact meet the requirements under the Market Abuse Regulation for public disclosure.

### **3. Would you change any of the descriptions, accepted values or applicability? Are the schemas or values that you are suggesting based on any industry standard?**

We consider that there would be value in consolidating some of the proposed fields and amending the accepted values for each to accommodate more information in just one field.

Message ID/Update ID/Balancing zone/Bidding zone/ACER registration code – Whilst we agree that the information provided in these fields is beneficial, we would suggest

consolidating the information into just one field in the form of relevant coding at the end of the unique identifier (e.g. Message ID – Update ID – Balancing zone – ACER registration). We consider that this would result in the information being displayed in an equally clear format and reduce the need for unwanted additional columns.

Event status/Type of event - We would suggest consolidating the information which is currently split between the two fields, 'Event status' and 'Type of event', into just one field which could potentially still be entitled 'Event status' but allow the following as accepted values:

- Planned
- Planned – ongoing
- Planned – superseded
- Planned – completed
- Planned – no longer required
- Unplanned – ongoing
- Unplanned – superseded
- Unplanned – completed

For electricity, the current values we use (identified above) are aligned with the industry standard for National Grid Electricity Transmission MODIS, BMRS, and EMFIP systems.

Message type (gas) – We do not consider that the list of accepted values is inclusive of all the information a market participant would need in order to fully understand the mechanism and characteristics of a outage. For example, 'storage unavailability' on its own does not give the market the correct level of information to determine whether the site is still able to operate at maximum levels of injectability and deliverability. We therefore consider the following additional values should also be accepted:

- Full deliverability outage
- Partial deliverability outage
- Full site outage
- Full injectability outage
- Partial injectability outage
- Storage outage affecting injectability and deliverability
- Storage outage affecting injectability
- Storage outage affecting deliverability



Message type (electricity) - We consider that 'Generation Unavailability' should be an additional accepted value. This is in line with ETR (European Transparency Regulation No 543/2013) and differentiates between generation units and production units.

**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?**

We consider that the use of an RSS feed would fulfil this requirement.