



**ASSOCIAZIONE ITALIANA DI GROSSISTI DI ENERGIA E TRADER**

**Agency for the Cooperation of Energy Regulators**

*Trg republike 3*

*1000 Ljubljana*

*Slovenia*

*Milan, December 8<sup>th</sup>, 2017*

**Public Consultation on the revision of electronic formats for transaction data,  
fundamental data and inside information reporting**

We generally agree with the proposed changes, especially the following: Proposed change No. A.1.4 and Proposed change No. A.3.1.

Here below you can find our remarks on the proposed changes:

**Proposed change No. A.1.3**

**Our view**

We agree with the purpose of harmonising the REMIT UTI format with the one used under EMIR. Nevertheless, if ACER wants to change the reasoning behind the UTI for reporting under Table 1, then it should do the same for reporting under Table 2, unless the Agency prefers to have two different reasonings depending on which type of contract (standard or non-standard) the MPs have to report.

**Proposed change No. A.6.4**

**Our view**

We agree with the proposal, but we prefer to make it optional. In fact, if the MP's IT systems manage data on a single asset/unit basis, the obligation to publish information on different assets/units with a single report would imply a change of the IT systems.

**Proposed change No. A.8.2**

**Our view**

We agree with the proposal, but we prefer to make it optional.



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**Proposed change No. A.4.2 and No. A.4.3**

**Our view**

Lithuanian litas should be removed from the list, since it was replaced by the Euro on January 1<sup>st</sup>, 2015.

Additional comments:

<b>Data type</b>	Art. 4 of REMIT
<b>Impacted field(s)</b>	
<b>Description of your change proposal/Other comment</b>	As for Italy, we think that it would be useful if all MPs used the same platform (such as the PIP provided by the GME - Gestore dei Mercati Energetici) for the disclosure of inside information, rather than using their own websites.
<b>Motivation for the change</b>	To simplify and harmonize the fulfilment of the obligation of the MPs to publish inside information.

Thanks and regards,

A handwritten signature in blue ink, appearing to be "P. Ghislandi".

Paolo Ghislandi  
(Secretary-General)