

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.1.2

[please provide the number of question to which you are providing feedback]

Respondent's view *

In general we agree with simplification and consistency of the approach. There are questions coming up that are difficult to understand without any further guidance on how you would want the new structure to be used. We assume that this will be part of additional documents that will come out together with the schemas.

Our main question would be i.e. for a standard peak load where the price does not change during the delivery. The delivery will be described in several elements of the ait1:REMITTable1/ait1:TradeList/ait1:TradeReport/ait1:contractInfo/ait1:contract/ait1:deliveryProfile structure.

Would you now allow to just have one element

ait1:REMITTable1/ait1:TradeList/ait1:TradeReport/ait1:intervalPriceAndQuantityDetails

to express the price and the quantity if that does not change for the whole delivery period ? If that is the case then we would prefer this change.

One additional remark: in the schema that was attached in the documents of the public consultation "REMITTable1_V3.xsd" the section is called "intervalPriceAndQuantityDetails". On the screenshot that is included in Annex A.1.2 the section is called "priceIntervalQuantityDetails". Are there two different versions of V3 existing?

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.1.3

[please provide the number of question to which you are providing feedback]

Respondent's view *

We would not agree with the change to the UTI format as long as we are not able to understand the impact. I.e. if this change would be done and a client would want to modify a report that was made before the change, how would this work? Would all reports with UTIs that do not fit to the new restriction have to be errored and send again with a new UTI that passes the rule before the change goes live?

If this change is important then we would suggest to leave the schema definition as is for now and just add a new validation rule that checks that for New events the UTI follows the new format but the schema itself is not changed.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

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Proposed change No. A.1.5

[please provide the number of question to which you are providing feedback]

Respondent's view *

Although we understand the purpose of this change we would not recommend to use another mock value for specific situations but get a validation rule in that checks the rare cases where the total notional is not needed and allows it to be empty or left away in exactly those scenarios. This would go in line with the proposal A.7.7. It would also follow the approach of A.4.8 that proposes to add new values so that no mock values have to be used as it is today.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.1.6

[please provide the number of question to which you are providing feedback]

Respondent's view *

We do not see much benefit in reporting this field as a detailed description of the delivery is already reported by filling the ait1:REMITTable1/ait1:TradeList/ait1:TradeReport/ait1:contractInfo/ait1:contract/ait1:deliveryProfile section. This field would just try to summarise what is described in the delivery profile but with no information added. In some cases it is difficult to map the delivery profile to one of the allowed values and so there is the potential risk that a lot of reports will have the value of "OT" in this field that does not add any information to the delivery profile. We would suggest to remove the field.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.2.2

[please provide the number of question to which you are providing feedback]

Respondent's view *

We do not see much benefit in reporting this field for Table 2 contracts. As most of the Table2 trades are bespoke we would think that in the majority of cases the LoadType "OT" will be used and that will not add any information to the report. We would suggest to remove the field.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.7.2

[please provide the number of question to which you are providing feedback]

Respondent's view *

We are of the opposite opinion here. We would suggest to add an offset to all "datetime" fields so that no interpretation is needed and input values can be checked to see what the reporting entity meant. When not allowing offsets anymore is will not be possible to check if there is an error in the submitted data.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex C- Form for providing additional changes and comments

Data type	Table 1
Impacted field(s)	ait1:REMITTable1/ait1:contractList/ait1:contract/ait1:contractName and ait1:REMITTable1/ait1:OrderList/ait1:OrderReport/ait1:contractInfo/ait1:contract/ait1:contractName and other occurrences
Description of your change proposal/Other comment	replace workarounds via field "contractName"
Motivation for the change	"EXECUTION" => insert explicit flag in TradeReport element "BILCONTRACT" = already defined by value in field "organizedMarketPlace"

Annex C- Form for providing additional changes and comments

Data type	Table 1
Impacted field(s)	ait1:REMITTable1/ait1:contractList/ait1:contract/ait1:duration
Description of your change proposal/Other comment	remove duration field
Motivation for the change	As per the guidance and the examples there is no scenario that requires this field. Therefore to avoid confusion it would be best to remove the field from the schema.

Annex C- Form for providing additional changes and comments

Data type	Table 1
Impacted field(s)	ait1:REMITTable1/ait1:TradeList/ait1:TradeReport/ait1:executionTime
Description of your change proposal/Other comment	clarify usage of executionTimestamp field (remove if not used)
Motivation for the change	<p>As per the TRUM the field TransactionTimestamp is used to reflect the execution time. There is no need for a separate field.</p> <p>The TransactionTimestamp of the New Action is equal to the execution time and there is no need to copy this timestamp into the field executionTimestamp of subsequent lifecycle reports as this value was already reported with the New record. So it only creates issues but contains no additional information that was not already reported.</p>

Annex C- Form for providing additional changes and comments

Data type	Table 1
Impacted field(s)	ait1:REMITTable1/ait1:TradeList/ait1:TradeReport/ait1:terminationDate
Description of your change proposal/Other comment	change terminationDate field from dateTime to date type
Motivation for the change	As per the TRUM this is a 10 character date only field. This should also be reflected in the schema.

Annex C- Form for providing additional changes and comments

Data type	Table 2
Impacted field(s)	New field as in Table1 ait1:REMITTable1/ait1:TradeList/ait1:TradeReport/ait1:transactionTime
Description of your change proposal/Other comment	For T2 there is no field to tell ACER when a lifecycle event happened as there is in T1.
Motivation for the change	To apply the same logic to reports, no matter it T1 or T2, it would be good to add a field that tells when a lifecycle event happened. This would make the history of a T2 more visible and in line with the information sent for T1.