

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

Proposed change No.A.1.1.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.1.2.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.1.3.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.1.4.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.1.5.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.1.6.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.2.1.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.2.2.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.4.1.

Respondent's view *

In GAZ-SYSTEM's view this suggestion is not in line with the scope of the consultation: The Agency intends to change the currently used XML schemas for transaction reporting only insofar as it is necessary further to enhance data collection and data quality. In addition, this Public Consultation addresses some minor changes of the fundamental data reported with IEC and Edigas standards.

To completely discard the existing five Edigas schemas and replace them with a new schema is a big change and would require massive workload and cost intensive IT projects from ALL RRM's reporting table 4 data. The proposed change also contradicts with "Whereis 19" of REMIT:

"Reporting obligation should be kept at a minimum and not create unnecessary costs or administrative burdens for Market Participants".

Bear in mind that GAZ-SYSTEM RRM reports table 1, table 2 and table 4 and this would create unnecessary IT project for us.

The proposed change for introduction and usage of a completely new electronic format for natural gas transportation contracts data reporting, at this point of time and stage of REMIT implementation, is significant one that will invoke massive workload and cost intensive IT projects for modification reporting systems.

Furthermore, the proposal for introduction of a brand new XSD for REMIT Table 4 is not based on the Edig@s standard. This is a contradiction regarding the requirements of several pieces of legislation:

1) REMIT IAs (Article 10 point 3):

3. *The Agency shall after consulting relevant parties establish procedures, standards and electronic formats **based on established industry standards** for reporting of information referred to in Articles 6, 8 and 9. The Agency shall consult relevant parties on material updates of the referred procedures, standards and electronic formats.*
This is also mentioned in Table 4 of the implementing Acts for field 9 and 14.

2) INT NC (Article 20 point 2):

*The data exchange requirements foreseen by point 2.2 of Annex I to Regulation (EC) No 715/2009, Commission Regulation (EU) No 984/2013, Commission Regulation (EU) No 312/2014, **Commission Regulation (EU) No 1227/2011** and this Regulation between transmission system operators and from transmission system operators to their counterparties shall be fulfilled by common data exchange solutions set out in Article 21.*

INT NC (article 21 point 2):

*The common data exchange solutions shall comprise the protocol, the data format and the network. The following common data exchange solutions shall be used for each of the types of data exchange listed in paragraph 1: (a) For the document-based data exchange: (i) protocol: AS4; (ii) **data format: Edig@s-XML**, or an equivalent data format ensuring identical degree of interoperability. Entsog shall publish such an equivalent data format.*

Proposed change No.A.4.2.

Respondent's view *

GAZ-SYSTEM supports aligning the possible currency values for Data field (17) CURRENCY.CODE of GASCAPACITYALLOCATION DOCUMENT with those accepted by REMITtable 2.

However, for the currencies GBX, EUX and PCT, please consider the argumentation below:

Issue: Not ISO 4217 compliant (GBX, EUX and PCT).

These codes do not exist in the ISO 4217 currency code standard. The use of EUR and GBP in the place of EUX and GBX merely require the use of the decimal places representing Euro cents and pence.

If the introduction of the codes EUX and GBX is to satisfy the TRUM text "(currency of the price using the smallest denomination in the currency system)" that implies that all price amounts should be expressed in their lowest currency this means that all the currencies will have to be revised accordingly. For example, "grojz", "haléru", "ore", etc will have to be added. We do not recommend this approach and propose the TRUM be modified to respect ISO 4127 as indicated in the TRUM type and to delete the above phrase.

The code PCT (percentage) is not understood to be a recognised currency and must be removed.

Proposed change No.A.4.3.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.4.4.

Respondent's view *

GAZ-SYSTEM supports the proposal. In addition the relevant description about this schema filed should be add to TRUM.

Proposed change No.A.4.5.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.4.6.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.4.7.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.4.8.**Respondent's view ***

GAZ-SYSTEM supports the proposal that the identification of the OMP shall be Mandatory but dependant and present ONLY in case of reporting of transactions always concluded on OMP, i.e. when PROCESS_TRANSACTION.TYPE is equal to

- ZSW = Ascending clock auction
- ZSX = Uniform price auction

and **highlights** that the identification of the OMP shall be Optional and (can be left blank) for all other transactions:

- ZSY = First come first served
- ZSZ = Secondary market procedure
- Over-nomination
- Open Subscription Window
- Open season
- Storage allocation
- Non-ascending clock pay-as-bid auction
- Conversion mechanism
- Pro-rata mechanism

Proposed change No.A.4.9.**Respondent's view ***

GAZ-SYSTEM supports the correction of the Edigas namespaces, but suggest that this is based on input form Easee-gas. Also requests that the Agency makes sure that the files with old namespaces will still be acceptable by ARIS after the new namespace is introduced.

Proposed change No.A.5.3.**Respondent's view ***

GAZ-SYSTEM supports the correction of the Edigas namespaces and also requests that the Agency makes sure that the files with old namespaces will still be acceptable by ARIS after the new namespace is introduced.

Proposed change No.A.5.4.**Respondent's view ***

GAZ-SYSTEM supports ONLY the extension of allowed values. GAZ-SYSTEM does not support the removal of ZSO as identifier in the code schema of gas nomination monitoring schema:

- 1) The code "ZSO" is used in several places as it is needed for identifying the reporting party (TSO = ZSO). This is also acknowledged by the suggestion in A.4.4 where ZSO is still allowed ("ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE")

2) TSO managed codes are necessary until NRAs have ensured that ALL market participants are registered with EIC or ACER codes, so the TSOs can fulfil their reporting obligations.

For the market communication there are industrial standards given by Easee-gas and approved by regulators. These standards are valid for the whole gas market and are used as binding principles for the TSO-TSO, Shipper-TSO and market area manager-Shipper communication. These standards also define which codes can be used for the identification of the parties, points, accounts etc. and it is a basic element of these standards to require that market role specific codes are used for identification of the parties. This requirement is satisfied when a ZSO Code is used. Therefore, it is necessary to use a ZSO code in market communication. As ZSO is a valid code for the communication, the introduction of ZSO-code in REMIT reporting would align the standardized communication within the market with the communication towards ACER as the market participants are able to create the messages towards ACER from the information given in the messages used in market communication based on the industrial standards.

Examples where ZSO is necessary:

internalAccount =

NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.internalAccount

externalAccount =

NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.externalAccount

In addition, ZSO code should remain for following Edigas XSD element for gas allocation:

GasCapacityAllocations_Document.Transportation_Transaction.primary_MarketParticipant.account.internalAccount

By "internal/external account" TSOs identifies the shipper's account/accounts in the TSOs internal systems, not the shipper itself.

It is possible that one shipper has many internal/external accounts.

For the nomination reporting purposes this identification can be done by using ZSO or 305 (EIC), but bear in mind that here the EIC code refers to EIC area code (with "Y" letter within the code number) and not the EIC for party codes (with "X" letter within the code number). It is not always possible to use EIC (Y) code for every shipper's account.

issuer_MarketParticipant.marketRole.code

In this element the "ZSO" is not a code to identify the Market Participant but to describe the characteristic of Market Participant – the role of the MarketParticipant.

recipient_MarketParticipant.marketRole.code

Currently, the only permitted code to describe the characteristic of Market Participant is "ZUA" in this element.

issuer_MarketParticipant.identification

recipient_MarketParticipant.identification

responsibleTso_MarketParticipant.identification

Currently, the only permitted code to identify the TSO in these elements is the EIC code.

internalAccountTso =

NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.internalAccountTso

externalAccountTso =

NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.externalAccountTso

Currently, the only permitted code to identify the TSO in these elements is the EIC code.

Proposed change No.A.5.5.

Respondent's view *

GAZ-SYSTEM does not object the change.

Proposed change No.A.5.6.

Respondent's view *

GAZ-SYSTEM supports the proposal. However we suggest a change in the description of the related datafield: Pursuant to Implementing Regulation (1348/2009) Art. 9, point 3, C on REMIT Regulation it is the LNG system operator, not the Market Participant's obligation to report planned and unplanned unavailability of the LNG facility.

Proposed change No.A.5.7.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.6.1.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.6.2.

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.6.3.

Respondent's view *

GAZ-SYSTEM supports the proposal, but requests for clarity in the Manual of Procedures for when to use which codes for the difference between "Storage unavailability" and "Storage facility unavailability" and in which cases each of the event types shall be used:

- "Storage facility unavailability"
- "Storage unavailability"
- "Injection unavailability"
- "Withdrawal unavailability".

Proposed change No.A.7.1

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.7.2

Respondent's view *

GAZ-SYSTEM does not support the proposal as the time settings are already aligned in the REMIT schemas and there is no added value for changing the settings.

Proposed change No.A.7.3

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.7.4

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.7.6

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.7.7

Respondent's view *

GAZ-SYSTEM does not as such support an approach of introducing validation rules on the fly but suggests that validation rules are discussed with the relevant stakeholders (TSOs, ENTSOs, LNG and Storage operators etc) before implementation.

Proposed change No.A.7.8

Respondent's view *

GAZ-SYSTEM supports the proposal but suggest some **alignment with the UMM schema for unavailability reporting**

More specific information is provided in our Annex C response and additional Guidance is requested regarding lifecycle event treatment for unavailability reporting.

Proposed change No.A.7.9

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.8.1

Respondent's view *

GAZ-SYSTEM supports the proposal.

Proposed change No.A.8.2

Respondent's view *

GAZ-SYSTEM does not support the proposal.
We are not completely sure if it is useful to have this complex change towards the scheme. Today we would use the field comments/remarks to indicate different period, if necessary. All in all, there would be much effort to update each hour, if the capacity

available is changing on an ad-hoc basis. The aim of this change should also not be to update after the maintenance etc. what was the capacity that was available during the outage.

Proposed change No.A.8.3

Respondent's view *

GAZ-SYSTEM cannot support this proposal as not all facilities and physical objects can be identified with EIC.

The proposed change may impose limitations for inside information disclosure in the cases when the affected assets or units do not have EIC code.

Annex C- Form for providing additional changes and comments

Data type	[REMITLNG]
Impacted field(s)	<p><modification in REMITLNGSchema_V2.xsd></p> <p>simpleType "ActionTypesType" optional fields (N/M/E)</p>
Description of your change proposal/Other comment	<p>Add 'Cancel' optional field if required (see below): <xs:enumeration value="C"/> <!-- cancel --></p> <p><i>Reason : change proposal A.7.8. in Annex A is listing 4 options (N/M/E/C) and the XSD only contains three (N/M/E).</i></p>
Motivation for the change	<p>Following the implementation of the LifeCycle mechanism as for REMIT Table 1 and REMIT Table 2, lifecycle events would include : <i>The below listing is based on description under 3.2.10 in TRUM v3.0 page 28:</i></p> <p>a/ the <u>submission</u> of a new report, identified as 'new' (N) b/ the <u>modification</u> of details of a previous report, identified as 'modify' (M) c/ the <u>cancellation</u> of a wrongly submitted report, identified as 'error' (E) d/ the <u>termination</u> of an existing report, identified as 'cancel' (C)</p> <p>A/ Specific remark related to unavailability reporting</p> <p>Similar to UMMs, unavailability reports related to the same event may be updated several times before and during the event. Inside information publication and unavailability reporting may also require a prognosis, for example regarding the duration of the event.</p> <p>Typically, unavailability reports and UMM are covering the same event.</p> <p><u>For unavailability reporting</u>, some alignment with the UMMSchema (REMITUMMSchema_V2) seems applicable or logical, as this would enable to implement <u>threaded reporting</u>.</p>

1/ Use of unique identifier to enable threaded reporting

To enable threaded reporting for unavailability reporting, similar as for UMM

reporting, we can use the existing datafield **<reportingEntityReferenceID>** as unique identifier, having the same function as <messageID> in the UMM schema.

We can also support replacing <reportingEntityReferenceID> by <messageID>.

This datafield / unique identifier would then also have the same field restriction as in the UMM V2 schema and will be composed of:

- *25characters_3digits* to match the UMM MessageID composition.
- The first 25 characters are then to be kept identical for each report related to the same unavailability event.
- The last 3 digits are incremental and indicate the sequence of updates related to the same unavailability event.

2/ Use of ActionType status field to enable threaded reporting

Example

Based on currently suggested ACER Schemas V2, the lifecycle function could be set up like this (for unavailability reporting):

- **New report:** ActionType=N, unavailabilityEndFlag=Estimated, messageID=1234567890ABCDEFGHIJKLMNO_001

- **Modification report:** ActionType=M, unavailabilityEndFlag=Estimated, messageID=1234567890ABCDEFGHIJKLMNO_002

- **Closure of the event:** ActionType=M, unavailabilityEndFlag=Confirmed, messageID=1234567890ABCDEFGHIJKLMNO_003

In case of error or cancelation: (report needs to be deleted):

ActionType=C, unavailabilityEndFlag=Confirmed, messageID=ABCDEFN123456GHIJKLM78900_006

OR

	<p>ActionType=E, unavailabilityEndFlag=Confirmed, messageID=ABCDEFN123456GHIJKLM78900_006</p> <p>We would request additional Guidance on new procedures related to lifecycle event reporting for unavailability reports. Especially related to a cancellation (or error):</p> <p><i>In case of cancellation of an unavailability event :</i></p> <ul style="list-style-type: none"> - Should the unavailabilityEndFlag be indicated as 'confirmed' or 'estimated'? - Should ActionType "E" or "C" be used? ("Cancel" seems most logical) <p>B/ Alternate approach for further alignment with UMM schema for unavailability reporting</p> <p><i>The above described approach is intended to keep schema changes minimal and would only require additional Guidance by ACER. An alternate approach is to align the unavailability reporting further with the UMM schema by using the <eventStatus> option fields "Active / Dismissed / Inactive".</i></p> <p><u>Potential removal of the <EndFlag> field</u></p> <p>Each unavailability is to be considered as having an estimated <unavailabilityEnd>, until the event is closed using the 'Inactive' event status.</p> <p><i>Implementation of the UMM lifecycle function to unavailability reporting thus has the additional benefit of enabling to remove <unavailabilityEndFlag> (Estimated / Confirmed end time).</i></p>
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Data type	[REMITLNG]
Impacted field(s)	1/ <reportingEntityReferenceID> 2/ <messageID> if the above described alignment with UMM schema would be implemented
Description of your change proposal/Other comment	Please <u>return</u> the reportingEntityReferenceID (or MessageID) in ACER Receipts to be able to improve our matching of the ACER Receipt with the original LSO report.
Motivation for the change	Currently, this datafield is <u>not</u> included in the ACER Receipt, <i>although it is stated as such in the ACER XML comment field.</i>

Data type	Table 4
Impacted field(s)	TRUM data field 9 PROCESS_TRANSACTION.TYPE
Description of your change proposal/Other comment	<p>Additional values to be allowed for the attribute PROCESS_TRANSACTION.TYPE that will permit proper and accurate identification of the applied capacity allocation process:</p> <ul style="list-style-type: none"> • XXY* = Pro-rata • Over-nomination** • Open Subscription Window ** • Open season** • Storage allocation** • Non-ascending clock pay-as-bid auction** • Conversion mechanism** • Other process** <p>* This code is merely suggestion.</p> <p>** aligned with Edigas standard: StandardStatusCategoryTypeList, Status category code</p>
Motivation for the change	The change will allow the reporting parties to precise the information for the applied allocation process. Furthermore, it will avoid the usage of workaround and arbitrary values that limit the monitoring possibilities of ACER and the NRAs.

Data type	UMM Schema No2 “Unavailabilities of gas facilities”
Impacted field(s)	Data field No 16 “Affected asset or unit name
Description of your change proposal/Other comment	<p>New attribute named “Direction code” to be introduced as a sub-field of the Data field No 16 “Affected asset or unit name”, with the following properties:</p> <ul style="list-style-type: none"> - Applicability: optional - Possible values: entry, exit - Type: alphanumeric characters
Motivation for the change	<p>Currently UMM Schema No2 “Unavailabilities of gas facilities” does not have an attribute for flow direction.</p> <p>In case that the Affected asset or unit is a connection point (interconnection point, cross-border point, connection point between transmission system operator and storage facility and so on), it could be bidirectional (entry/exit point).</p>

	<p>The point's capacity is direction dependent, respectively the values of the UMM Schema No2 attributes: Technical capacity, Available capacity and Unavailable capacity depend on the point direction.</p> <p>In summary, the technical, available and booked capacities in normal circumstances are different for the different point direction. This means that during an event of unavailability, both sites of a point could be affected and respectively - the affected capacities are different per point direction.</p>
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Data type	UMM Schema No3 "Other market information"
Impacted field(s)	Data field No 13 "Remark"
Description of your change proposal/Other comment	We would like to suggest to extend the maximum length/number of alphanumeric characters allowed for Data field No 13 "Remark" from 500 to 1000.
Motivation for the change	To be able to provide as exhaustive as possible information to the market through messages based on Schema No3 "Other market information", we suggest to extend the maximum length/number of alphanumeric characters allowed for Data field No 13 "Remark" from 500 to 1000.