

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

Proposed change No. A.1.3

Respondent's view *

Changing the UTI method is complex and has significant impact especially for market participants who are only subject to REMIT reporting and not EMIR reporting.

GRTgaz is not in favour of this proposal. However, if it was to be adopted, **update of the UTI tool published by ACER would be essential.**

Proposed change No. A.4.1

Respondent's view *

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:

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.*

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. Entso-g shall publish such an equivalent data format.*

It also

3) invalidate the efforts and proposals of EASEE-gas for improvements of the existing and currently used Edig@s based GasCapacityAllocation schema.

And introduces

4) Extra effort and costs for ALL Market Participants to build and maintain an extra interface.

Proposed change No. A.4.3**Respondent's view ***

The current schema has a generic attribute that defines the currency used for all prices within the electronic document.

Consequently data field 17 of the TRUM (currency.code) identifies the currency for all the price attributes that are defined in the document.

It is naturally assumed that the prices for an electronic document are all expressed in the same currency.

GRTgaz doesn't see this change as necessary, it seems covered by proposed change A.4.2.

Proposed change No. A.4.4**Respondent's view ***

There is no issue to add the codes for the roles ZSH and ZUA to the restricted codelist for the issuer market participant.

Proposed change No. A.4.5**Respondent's view ***

There is no issue to add the coding schemes "A01" for an ACER code and "9" for a GLN code to the data field 27 coding schemes.

However, the addition of the code BIC (Bank Identification Code), which only identifies banking institutions their country and eventually their outlets, appears not to be relevant in the context of gas transactions and fundamental data. To our knowledge banks operating within the gas sector already have and use an EIC code. To our knowledge it is not used in the gas sector for transaction data or fundamental data reporting

The addition of the LEI (Legal Entity Identifier) code that uniquely identifies legally distinct entities that engages in financial transactions. Implementation limit date January 2018. It is a code that has a 20 character length and will require a change to the coding scheme core component datatype for coding schemes that is currently limited to 16 characters. This code is not used within the gas sector. It is also necessary for a market participant to apply via a LOU (local operating unit) and pay for an LEI code. Finally the code must be renewed on a periodic basis.

Since all market participants should have an ACER code it is felt sufficient to extend the coding schemes to EIC, ACER and GLN.

While we understand the requirement for ACER to provide for the LEI and BIC codes in the ARIS system, it is not a requirement to make use of these codes within the gas sector.

Proposed change No. A.4.6

Respondent's view *

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Proposed change No. A.4.7**Respondent's view ***

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Since all market participants should have an ACER code it is felt sufficient to extend the coding schemes to EIC, ACER and GLN.

While we understand the requirement for ACER to provide for the LEI and BIC codes in the ARIS system, it is not a requirement to make use of these codes within the gas sector.

Proposed change No. A.4.8

Respondent's view *

GRTgaz 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

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

GRTgaz supports the correction of the Edigas namespaces but suggests that this is based on input from Easee-gas. GRTgaz 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.5.1**Respondent's view ***

The transaction attribute may be changed to optional. However, it must be clear that in this case the identification of the Transaction class becomes the "type" attribute.

Proposed change No. A.5.2**Respondent's view ***

GRTgaz supports adding the new field, but doesn't see the need for more values than necessary. All TSOs have EIC codes and thus we feel that ENTSOG just need the coding scheme "305" representing an EIC code.

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

GRTgaz supports the correction of the Edigas namespaces but suggests that this is based on input from Easee-gas. GRTgaz 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 *

GRTgaz supports ONLY the **extension** of allowed values. GRTgaz **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.

Proposed change No. A.5.5

Respondent's view *

GRTgaz does not object to the change.

Proposed change No. A.7.6**Respondent's view ***

No issue with minimal and maximum length of a mandatory field. This is implemented in all the Edigas schemas.

Proposed change No. A.8.2**Respondent's view ***

GRTgaz 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 *

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

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

Not all objects of the gas infrastructure have EIC codes, e.g.: assets like pipeline sections, linear valves, gas pressure reduction stations, IT systems etc. are not identified with EIC codes.

If the attribute "Affected Asset or Unit EIC Code" of the UMM Schema No2 "Unavailabilities of gas facilities" become mandatory, events related to the unavailability of those assets could not be disclosed.

As a consequence, this will hamper the REMIT data collection process, will not allow the relevant market participant to fulfil its disclosure obligations under Article 4 (1) of Regulation (EU) No 1227/2011 and last but not least – will bereave the market from valuable information for event(s) of unavailability.