

ACER  
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Date  
December 08, 2017

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Re: Changes to the electronic formats for transaction data

Dear Sir/Madam,

GasTerra appreciates the opportunity to comment on the proposed changes to the electronic formats for transaction data. Below you will find our comments to the concrete change proposals and an additional change proposal in the requested forms.

In general we would like to point out that past changes have proven to be more burdensome than expected and have required extensive effort and investments from market participants, which should be avoided. Eventual changes should only impact the reporting in the future and should not require corrections to already reported transactions. Moreover, there should be clarity on how changes to already reported transactions have to be reported. Reporting of changes to already reported transactions should in any case not impose an additional burden on market participants.

We strongly believe that the procedures, standards and electronic formats and any changes thereto should be based on established industry standards for reporting as required by Article 10 para 3 of the REMIT Implementing Regulation 1348/2014. The Edig@s standard and schemas are such established industry standards. We urge ACER to aim for the alignment of the procedures, standards and electronic formats and any changes thereto with the Edig@s standard.

**Comments to proposed changes:**

**Proposed change No. A.1.3**

**Respondent's view \***

We urge ACER not to change the format of the UTI. The consequence of such a change would be that all current UTI's will have to be redefined and synchronized with the contract parties, which is unnecessarily burdensome for market participants.

**Proposed change No. A.4.1**

**Respondent's view \***

We recommend maintaining the current table 4 schemas in order not to require the market to implement a new schema with the unnecessary added cost of implementation.

**Proposed change No. A.4.2**

**Respondent's view \***

It seems logical to extend the currency code-list with the currencies of the countries not using Euros. This merely requires the extension of the currency restricted code-list accordingly. However, the codes GBX, EUX and PCT are not ISO 4217 compliant and should not be introduced.

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.

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 \***

The proposed change A.4.2 seems sufficient and makes the proposed change A.4.3 obsolete.

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**Proposed change No. A.4.5**

**Respondent's view \***

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

**Proposed change No. A.4.6**

**Respondent's view \***

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

**Proposed change No. A.4.7**

**Respondent's view \***

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

**Proposed change No. A.4.8**

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**Respondent's view \***

The proposed change seems logical. However the phrase "and other processes executed on the OMP" is unclear. No other processes have been identified and there are apparently no codes allocated to identify them. The complete set of OMP operations must be defined for this to be correctly implemented.

**Proposed change No. A.4.9**

**Respondent's view \***

We strongly support a general alignment with the EASEE-gas messaging and documentation.

The correct definition of the Edigas namespaces for the electronic documents used within REMIT should be:

urn-easee-gas-eu-edigas-remit-gascapacityallocationsdocument-5-1-n.xsd  
urn-easee-gas-eu-edigas-remit-contractmarketmonitoringdocument-5-1-n.xsd  
urn-easee-gas-eu-edigas-remit-nominationmonitoringdocument-5-1-n.xsd

**Additional change proposal:**

Data type	Tabel 2
Impacted field(s)	Data Field No (41) EIC code field
Description of your change proposal/Other comment	Alignment of ACER's list of EIC codes with the list of EIC codes of ENTSO-E
Motivation for the change	Reporting in the past has taken place in accordance with the list of ENTSO-E.  If market participants have to report only EIC codes listed in the list of ACER and ACER does not update this list, market participants would

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	not be able to report the actually used EIC codes. This would result in additional administrative burden and investments for market participant and would lead to the submission of data of lower quality.
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GasTerra remains available for further discussions on the above issues. If you have any questions, please, do not hesitate to contact Ivelina Boneva at [ivelina.boneva@gasterra.nl](mailto:ivelina.boneva@gasterra.nl).

With kind regards,



Herbert van Zijll de Jong

Manager Legal and Regulatory Affairs