

# Frequently Asked Questions (FAQs)

on

REMIT fundamental data and  
inside information collection

8<sup>th</sup> Edition

10<sup>th</sup> December 2024

## Version history

Version	Effective Date
Frequently Asked Questions (FAQs) on REMIT fundamental data and inside information collection 1.0	31 March 2016
Frequently Asked Questions (FAQs) on REMIT fundamental data and inside information collection 2.0	16 June 2016
Frequently Asked Questions (FAQs) on REMIT fundamental data and inside information collection 3.0	15 November 2016
Frequently Asked Questions (FAQs) on REMIT fundamental data and inside information collection 4.0	18 May 2017
Frequently Asked Questions (FAQs) on REMIT fundamental data and inside information collection 5.0	8 January 2019
Frequently Asked Questions (FAQs) on REMIT fundamental data and inside information collection 6.0	16 July 2019
Frequently Asked Questions (FAQs) on REMIT fundamental data and inside information collection 7.0	30 April 2021
Frequently Asked Questions (FAQs) on REMIT fundamental data and inside information collection 8.0	10 December 2024

## **Contents**

<b>I. Introduction</b>	<b>5</b>
<b>II. Frequently Asked Questions (FAQs) on REMIT fundamental data collection</b>	<b>6</b>
II.1. GENERAL QUESTIONS	6
II.2. ELECTRICITY	6
II.2.1 Nominations	6
II.3. GAS	7
II.3.1 Nominations	7
II.3.2 LNG	12
II.3.3 Storage	19
<b>III. Frequently Asked Questions (FAQs) on REMIT inside information collection</b>	<b>23</b>
III.4. GENERAL QUESTIONS	23
III.5. QUESTIONS RELATED TO THE DATA FIELDS	32
III.6. TECHNICAL QUESTIONS	38

The 8<sup>th</sup> edition of the FAQs on REMIT fundamental data and inside information collection includes updates to align the document with amended legislation (revised REMIT and other relevant acts), as well as the removal of outdated questions 4.1.11, 4.1.12 and 4.1.13 due to the changes contained in REMITUMMGasSchema\_V2 (addition of allowed unit, kWh/h).

## I. Introduction

This frequently asked questions document (hereafter referred to as 'FAQ document') contains questions received concerning the collection of inside information and fundamental data. The FAQ document contains questions received in relation to the Manual of Procedures (MoP) on data reporting under REMIT. The Manual assists reporting entities to provide transactions, fundamental data and inside information to the Agency under Regulation (EU) No 1227/2011 (REMIT), Regulation (EU) 2024/1106 (Regulation amending REMIT) and Commission Implementing Regulation (EU) No 1348/2014.

The purpose of the FAQ document is to provide clarifications and to raise transparency on the uniform rules for the collection of fundamental data and inside information.

The FAQ document is separated into two main parts that include frequently asked questions and answers related to the collection of fundamental data and inside information. This document is directed to the public, but in no way provides a legal interpretation of REMIT and it does not by any means substitute the MoP on data reporting under REMIT, Commission Implementing Regulation (EU) No 1348/2014 or REMIT itself.

The questions have been received from stakeholders via roundtables organised by the Agency and via the REMIT Query form.

The answers included in this FAQ document have been drafted by the Agency and have been previously discussed with stakeholders on roundtable meetings organised by the Agency. The Agency will update this FAQ document on a regular basis.

Market participants have to bear in mind that they have to comply with the obligations and the prohibitions established in REMIT. All REMIT related documents are published at the REMIT Portal: <https://www.acer-remit.eu/portal/public-documentation>

### **Disclaimer:**

The questions contained in this FAQ document are genuine stakeholder questions raised with the Agency. The review of the questions carried out by the Agency has been strictly focused on their anonymization with the aim of eliminating references made to company names, products or any other items that could be clearly linking to the sender of the question.

## II. Frequently Asked Questions (FAQs) on REMIT fundamental data collection

### II.1. General Questions

Questions to be addressed in the future

### II.2. Electricity

#### II.2.1 Nominations

##### Question 2.1.1

According to the MOP Version 3 of 30 September, you require the market participants in the data fields 11 "schedule\_Time\_Period.timeInterval start" and 12 "schedule\_time\_Period.timeInternal end" to report the beginning and end of their nomination schedule period in UTC time standard.  
But regarding the daylight savings time issue: Can electricity TSOs report their nomination schedule period during the summer as <date1-1>t:22:00Z to <date2-1>T22:00Z and during the winter <date1-2>T23:00Z to <date2-1>T23:00Z?

##### Answer

On the basis of the IEC ENTSO-E standards, which deal natively with daylight savings, 23 time periods should be reported during the daylight savings time and 25 time periods in winter time. Same applies for nomination schedules: 23 time periods during the daylight savings time and 25 time periods in winter time.

##### Question 2.1.2 [NEW]

My question is related to REMIT fundamental information, article 8(3) reporting of electricity nomination. Nominations in MoP are to be reported by bidding zone. In FR-UK border, following the construction of two new interconnection lines, Line A and Line B, transparency data publications will be separated by interconnector. We will thus create a new fake bidding zone for Line A, that will be characterized by a new EIC code. Shall we keep REMIT nomination reporting at FR-UK level, or should we distinguish the 3 interconnecting lines (Line A, Line B and Line C) between the two borders in the in\_domain and out\_domain attributes of the existing schedule market document?

Value of in and out domain in timeSeries where nomination is between France and the United Kingdom is currently holding a single EIC code for each bidding zone (FR, UK).

We remain on the existing reporting values, without distinguishing the connecting lines (same existing bidding zones) as long as the market participants are clearly identified and all the nominations reported.

## Answer

Please note that, according to Article 8(3) of REMIT Implementing Regulation, Electricity TSOs or third parties on their behalf shall report to the Agency and, at their request, to national regulatory authorities in accordance with Article 8(5) of REMIT final nominations between bidding zones specifying the identity of market participants involved and the quantity scheduled. Therefore, electricity nomination data on the FR-UK border shall be reported on a bidding zone border level, i.e. the sum-up/aggregated value of all the existing interconnectors shall be reported for nomination.

## II.3. Gas

### II.3.1 Nominations

#### Question 3.1.1

As from 1 October 2015, with the entry into force of the CAM NC, shippers now submit Double Sided and Single Sided nominations to initiating and matching TSOs. When the initiating and matching TSOs report the fundamental information at the Interconnection Points which TSO should report the Single Side Nomination and allocation information - the initiating TSO, the matching TSO or both TSOs?

We have an understanding that the spirit of REMIT is to avoid double reporting which would be the case with regards Single Side Nominations and related allocations.

In the Edigas REMIT Reporting Process v5.1 chapter 4 'Nominations Monitoring Process', in section 4.1.6 'Rules Governing the Shipper\_Account Class' it contains the following data fields:

- a- Internal\_marketparticipant.identification
- b- Internalaccount
- c- Internalaccounttso
- d- Externalaccount
- e- Externalaccounttso

The Internal\_marketparticipant.identification, internalAccount and ExternalAccount will all be identical in case of a Single Side Nomination.

If the matching TSO reporting their data populates the InternalAccountTSO with the EIC of the initiating TSO this would mean duplication of reporting as the Initiating TSO would provide identical details when reporting the same Single Side Nomination.

## Answer

In the Agency's view a single side nomination report should be submitted. It is up to the TSOs to agree on who the reporting, and one TSO can report a single side nomination. If the TSOs cannot agree, both TSOs should report nominations separately.

#### Question 3.1.2

According to Article 9 (2) (a) of Implementing Regulation (EU) No. 1348/2014, nominations and re-nominations have to be reported with regards to:

- (a) all interconnection points,
- (b) entry points of production facilities including of upstream pipelines,
- (c) for exit points connected to a single customer,
- (d) entry and exit points to and from storage,
- (e) for LNG facilities,
- (f) for physical and virtual hubs.

Which points shall be considered as interconnection points for the purpose of TSO REMIT reporting of fundamental data?

### **Answer**

The Agency's current understanding is that only cross-border interconnection points and connection points between adjacent balancing zones shall be considered as interconnection point and as such to fall into the scope of TSO REMIT reporting of fundamental data according to Art. 9 (9) (a) of Implementing Regulation (EU) No 1348/2014.

### **Question 3.1.3**

What is the applicable deadline for reporting gas nominations?

### **Answer**

In the Agency view's, gas fundamental data usually refers to a gas day running from 6:00 am of one day to 6:00 am of the following day. The information provision deadline of Article 9(2) of Implementing Regulation (EU) No 1348/2014 refers to the working day following the end of the gas day. Therefore, for example, for the gas day 01.10.2015-06:00 to 02.10.2015-06:00 the fundamental data is reportable no later than the end of the following working day i.e. by the end of 03.10.2015.

### **Question 3.1.4**

Final re-nominations for Interconnection Points, required by Article 9.2 (a) from Regulation (EU) No 1348/2014. There are different ways to interpret "Final re-nominations". TSOs can use the last processed quantity of a nomination or the original nominations, without any processing in the TSO-system. Which value should be sent to ACER?

### **Answer**

In the Agency's view the last re-nomination sent by the shipper to the TSO shall be submitted to the Agency as "Final Re-nomination for Interconnection Points" required by Article 9 (2) (a) of Implementing Regulation (EU) No 1348/2014.

### **Question 3.1.5**



According to Edig@s MIG for the Nomination and Contract Market Monitoring schema in the field RECIPIENT\_MARKETPARTICIPANT.IDENTIFICATION the RRM shall point the EIC code of the Report recipient, i.e. ACER EIC code.

Would you please point the ACER EIC that shall be included in the field RECIPIENT\_MARKETPARTICIPANT.IDENTIFICATION of Nomination Monitoring schema and Contract Market Monitoring schema?

**Answer**

ACER's EIC code is "10X1001B1001B61Q" and it is available in the latest version of the Manual of Procedure (MoP) on data reporting.

### Question 3.1.6

There are different ways to interpret "Day-ahead nominations". Because a Network User can amend the nomination until the initial nomination deadline there might be many nominations submitted by the Network User. The last received nomination before the nomination deadline is taken into account by the TSO for the scheduling of the gas flow.

Which nomination should be reported?

**Answer**

In the Agency's view the last nomination before the initial nomination deadline sent by the shipper shall be submitted to the Agency as "Day-ahead nomination" required by Article 9 (2) of Implementing Regulation (EU) No 1348/2014.

### Question 3.1.7

According to Article 9 (2) of Implementing Regulation (EU) No 1348/2014, allocation and re-nomination data need to be reported to ACER on the working day following the allocation. This means that these data will be preliminary and not final. However, corrections of allocations are possible within different time periods according to national law. TSOs believe that updates of fundamental data do not have to be reported to ACER.

Does ACER consider it necessary that the TSOs shall send the respective updates of the fundamental data to ARIS?

**Answer**

The fundamental data will be reported on a working day following the end of the gas day. The Agency has been informed that the only updates of fundamental data (nominations) that can occur after reporting on a working day following the end of the gas day are those resulting from a technical failure/error in the TSO system.

Therefore, no updates of fundamental data (nominations) beyond a working day following the end of the gas day (D) are required to be sent to the Agency by the TSOs unless there was a technical failure/error in the TSO system and the data was reported incorrectly to the Agency.

### Question 3.1.8

In the answer to Question III.3.16 ACER Q&A on REMIT 7<sup>th</sup> Edition, updated 30 June 2015, ACER states the following, regarding "DSOs": "The Agency also understands electricity and gas distribution networks to be consumption units with regard to electricity and gas that is consumed in order to cover grid losses. Therefore, the Agency understands a DSO as final customer and market participant if the aforementioned grid losses are above the threshold of 600 GWh per year. The Agency will aim at providing further guidance on the above definition as required".

Would you confirm our understanding that the case described in the answer to Question III.3.16 ACER Q&A on REMIT 7<sup>th</sup> Edition refers to the reporting of supply contracts?

Would you confirm that the TSOs shall **not** report fundamental data to ACER that refer to connection points between DSOs and TSOs?

### Answer

According to the Agency's Manual of Procedure (MoP) the information should be provided at daily resolution at least for all bookable points for the reporting day and relating to the network of the relevant gas TSO such as:

- all interconnection points,
- entry points of production facilities including of upstream pipelines,
- exit points connected to a single customer [as defined in Article 2(5) of REMIT],
- entry and exit points to and from storage,
- LNG facilities, and • physical and virtual hubs.

Fundamental data as per Article 9 (2) (c) shall be reported for exit points connected to a single customer if the threshold of 600 GWh/year is exceeded. TSOs shall not report fundamental data to the Agency that refers to connection points between DSOs and TSOs.

### Question 3.1.9

Reporting of fundamental data for end customers with consumption > 600 GWh/year pursuant to Article (9)(2)(c) of Implementing Regulation (EU) No 1348/2014: "For these customers no nominations or re-nominations are available".

Would you agree that in this case, regarding fundamental data reporting for the end consumers in Germany, the TSOs must report only allocation data, and shall not report any information about the nominations and the re-nominations, since the end consumers do not nominate/re-nominate capacity to the TSOs and such data is not available to the TSOs?

If it is TSOs position that reporting of "zero" values for nominations and re-nominations are not appropriate because this could lead to the assumption that a nomination with a value of 0 was given which is not true. In addition, this would fill up the databases of ACER with irrelevant data and lead to an unnecessary increase of the data volume of the messages. Therefore, the TSOs believe that only allocation data should be reported.

### Answer

If the nominations or re-nominations are not available to the TSOs, then there is no need to report nominations or re-nominations with "zero" value. Only allocation data should be reported.

## Question 3.1.10

TSOs have to report nominations and allocations of booked capacities. If the Capacity is booked on a virtualized point (comprising two or more physical points), but the nominations and allocations are still made on the physical points (therefore points with different EIC codes than the virtual point where the capacity was booked), how the nominations and allocations shall be reported? Per physical or virtualized point?

Should the TSO aggregate the nominations and allocations for both physical points and report them as nominations and allocations for the virtual point?

It is TSOs position that in order to have a better understanding of how the capacity is used, it is better to aggregate the nominations and allocations and to report them under the EIC code of the virtualized point. This is the approach for data publication on the Transparency Platform of ENTSOG in case of virtualized points.

### Answer

Nominations and allocation should be reported in a way that fits the specific/national market design. In most cases it is expected that it will be reported per physical point, but if the market design is constructed in a way that virtual points encompass two or more physical points then nominations may be reported per virtual point.

## Question 3.1.11

How shall corrections of gas nomination (NominationMonitoring\_Document schema) data be reported?

### Answer

In the Agency's view, each retransmission of a document that introduces changes to the previous reports of gas nomination should be submitted by incrementing the value of the field "Version" by 1.

## Question 3.1.12

Do TSOs need to report gas trade notifications at virtual trading hubs?

Article 9 of the REMIT Implementing Regulation: Rules for the reporting of fundamental data on gas

Paragraph 2: Gas TSOs or third parties on their behalf shall report to the Agency and, at their request, to national regulatory authorities in accordance with Article 8(5) of Regulation (EU) No 1227/2011 day-ahead nominations and final re-nominations of booked capacities specifying the identity of the market participants involved and the allocated quantities. The information shall be made available no later than the following working day.

...(f) for physical and virtual hubs.

Commission Regulation (EU) No 312/2014 establishing a Network Code on Gas Balancing of Transmission Networks

## Article 4: BALANCING SYSTEM

Section 3. Network users shall have the possibility to enter into a legally binding agreement with a transmission system operator which enables them to submit trade notifications irrespective of whether they have contracted transport capacity or not.

Article 9(2) of the REMIT Implementation Regulation requires to report nominations and re-nominations at virtual hubs. At the same time Commission Regulation (EU) No 312/2014 defines that for virtual trading hubs there is only trade notification used and no nomination/re-nomination needed (as no capacity allocated).

### **Answer**

In the Agency's view trade notifications from TSOs at virtual trading hubs do not have to be reported as nominations if no nominations/re-nominations are required according to Commission Regulation (EU) No 312/2014. All the details should be reported by market participants as a supply contract.

## II.3.2 LNG

### Question 3.2.1

How shall corrections of LNG data be reported?

### **Answer**

Updates or corrections to any previously submitted data according to Article 9 (3) and 9 (5) of Implementing Regulation (EU) No 1348/2014 should be sent in a new file.

The date in the filename should correspond to the date the update and/or correction report is sent. Dates inside the file should refer to the date for which the updates or corrections are referring to.

### Question 3.2.2

Shall we understand that as far as the "technical capacity", "contracted capacity" and "send-out" values do not include the truck loaded quantities as the truck loading services are out of scope of REMIT?

### **Answer**

It is the Agency's understanding that LNG truck loading services are not in the scope of REMIT. Therefore, the capacities offered through truck loading services should be excluded from reporting according to Article 9(3) of Implementing Regulation (EU) No 1348/2014.

### Question 3.2.3

Technical capacity, Contracted capacity, Available capacity, Send-out, Inventory

Technical capacity – is it a maximum speed of regasification in the LNG terminal guaranteed throughout the entire calendar year or rather a daily maximum available regasification speed less the potential, partial (or complete) installation unavailability?

Contracted capacity - is it a maximum contracted speed of regasification (according to the terms and conditions of the contract) or rather daily nominations reported by the Terminal User (under a contract)?

Available capacity – shall represent a simple subtraction of cell values as follows: “available capacity” = “technical capacity” – “contracted capacity”?

Send-out – shall mean actual values resulting from send-out or reloading volumes measured in the LNG terminal expressed in GWh/d?

## Answer

Further to definitions provided in the Manual of Procedure on data reporting the Agency’s understanding of technical capacity, contracted capacity, available capacity, send-out and inventory are the following:

- Technical capacity means the daily total firm regasification capacity that the LNG Facility Operator can offer to the terminal users, taking account of system integrity and the operational requirements of the terminal expressed on a daily basis in GWh/day.
- Contracted capacity is the capacity that the LNG Facility Operator has allocated to users by means of a contract expressed on a daily basis in GWh/day.
- Available capacity is part of the technical capacity that has not been allocated to users and is still available expressed on a daily basis in GWh/day:  
“available capacity” = “technical capacity” – “contracted capacity”.
- Send-out is the aggregated daily gas flow (regasified LNG) from the Terminal into the gas transmission system expressed in GWh.
- Inventory is the total volume of LNG in the LNG tanks at the end of the previous gas day, expressed in GWh.

### Question 3.2.4

What should we report as available capacity in case of planned/unplanned reduction of the daily technical capacity of an LNG facility?

Example: On a given gas day there is a planned/unplanned reduction of the daily technical capacity (example: from 21,9MSm<sup>3</sup>/d to 18 MSm<sup>3</sup>/d). The reduction has no impact on the daily nomination (which is, for example, 5 MSm<sup>3</sup>/d).

Do we need to keep unchanged the value of the available capacity and to send the information only through the planned/unplanned report or do we need to change also the available capacity? If the latter, how should we change the data? Should we report 0 as available capacity, or should we leave it as it is because there is no impact on the

daily nomination (to avoid providing multiple information which is not useful to the market)?

**Answer**

Technical capacity will be reported in GWh/day and the value of 21,9MSm3/d shall be converted accordingly. Contracted capacity remains the same. Unavailable capacity of 3.9 MSm3/d (needs to be converted to GWh/day) will be reported under the field 'unavailableCapacity'.

Available Capacity = "technical capacity" (21,9) - "contracted capacity" (5) = 16.9 MSm3/d shall be converted into GWh/day.

### Question 3.2.5

In case an LNG Storage Operator (LSO) does not offer the reporting service, there is uncertainty as to who the responsible Market Participant responsible for reporting the unloading/reloading information to ACER should be, given the LNG could change ownership several times between the ship and the flange of LNG plant.

Title to LNG can change several times before it is discharged. Therefore, for the purposes of reporting LNG unloading/re-loading data it is questionable who the market participant responsible for reporting the unloading/reloading information to ACER is.

MP1 sells its LNG cargo to MP2 before the ship starts unloading. MP2 also owns the terminal capacity. Who is responsible for reporting?

**Answer**

In the Agency's view it is the last person in the chain who will report unloading and reloading data. Where exchange of title has occurred before unloading/reloading commences at the flange, MP2 in the above example is responsible for reporting the loading/unloading data.

Where title is retained by MP1 but MP1 does not own the terminal capacity, the Agency understands that the LSO may not be able to report on their behalf. Therefore, it is the Agency's understanding that the capacity holder (MP2) is responsible for the reporting and this can identify the MP1 in its report when MP2 reports the information. MP2's ID will be reported in the terminalCustomerIdentifier field, and MP1's ID in the marketParticipantIdentifier field.

However, the LSO might report on behalf of the capacity holder (MP2) and should identify (if possible) MP1 in the marketParticipantIdentifier field. The Agency understands that, where the LSO reports on behalf of the capacity holder MP2 and has no information on MP1, the LSO may report MP2 in both marketParticipantIdentifier and terminalCustomerIdentifier fields if the LSO has no information on MP1.

### Question 3.2.6

Duplication of data fields between LNG transaction and Fundamental data reports.

A comparison of the data to be provided for LNG transaction and fundamental data reporting has identified areas for potential duplication of reporting. Recital 19 of REMIT notes that any kind of double reporting should be avoided.

Our view is to reduce duplicate reporting it would be helpful if ACER could enable, via a "No-action letter" Market Participants to use the execution files to also fulfil the obligation to report LNG Participant Activity Fundamental Data.

Rationale: we are aware that the REMIT implementing regulation requires reporting of both executions and fundamental data for a delivery of an LNG cargo. However, there is a need to avoid double reporting arising from Recital 19 of REMIT.

## **Answer**

The data fields collected for LNG transaction data and LNG fundamental data are defined in Commission Implementing Regulation (EU) No 1348/2014. Although some data fields for LNG fundamental data are also present in executions of LNG transactions, the scope of fundamental data is broader.

According to Article 10(3) of Commission Implementing Regulation (EU) No 1348/2014, the Agency shall establish procedures, standards and electronic formats based on established industry standards for reporting of information referred to in Articles 6, 8 and 9 of the said regulation. Its Article 9 determines rules for the reporting of fundamental data on gas.

From Article 10(3) of Commission Implementing Regulation (EU) No 1348/2014 it is clear that separate procedures and formats have to be established for fundamental data reporting under REMIT.

Please note that the Agency already aims at minimising the reporting obligation on market participants as much as possible by collecting the required information from existing sources where possible.

## **Question 3.2.7**

### Timing/ Frequency of reporting an LNG Participant Activity Report

LNG fundamental data relating to dates of unloading and reloading and volumes unloaded and reloaded per ship must be reported to the Agency by market participants '...no later than the working day following unloading or reloading.'

However, the final volume unloaded/reloaded may not be known until after T+1 for various reasons, e.g. the report providing final discharge/load figures may be issued late and we and/or our counterparty may disagree with the report (see practical examples below).

Example 1): Delay in receiving Inspector's report containing load or discharge figures

Ø Vessel completes discharge 23:00 1st January

Ø Inspector report issued 23:00 2nd January

Ø Final figures cannot be actualised in system and reported to REMIT until a.m. 3rd January.

Ø Should an estimate be submitted within T+1? In which case, can an updated figure be submitted on T+2?

Example 2): Quantity discharged or loaded is disputed between parties and cannot be deemed as final on T+1

- Ø Vessel completes discharge 09:00 1st January
- Ø Inspector report issued 19:00 1st January
- Ø Counterparties disagree with figures on morning of 2nd January. Parties agree to a retest, which requires 24 hours.
- Ø Retest results made available 12:00 3rd January.
- Ø Parties agree on new test results 4th January. Final Figures cannot be actualised in system and reported to REMIT until this day.
- Ø Should an estimate be submitted within T+1? In which case, can an updated figure be submitted on T+3?

**Answer**

According to Article 9(6) of Commission Implementing Regulation (EU) No 1348/2014 the information referred to in Article 9(5)(a) of the said regulation shall be made available no later than the working day following unloading or reloading.

In the examples described above, the inspector reports issues within a t+1 day time frame. This is why the Agency would consider the unloading or reloading only completed once the issue reported by the inspector is sorted out and the t+1 day timeline only starts to run as of then. In general, such inspections and potential dispute settling between the parties on test results of cargo figures should be considered an integral part of the LNG unloading and reloading.

**Question 3.2.8**

What is the frequency of reporting of the planned loading/reloading of LNG (IngPlannedUsageReport)?

There is a lack of clarity of the frequency of the reporting in case of varieties during the current month.

In our view the report should be submitted once for each calendar month and submitted before the start of the relevant calendar month. The concept could be endorsed by the Agency via a "no action letter" or via additional guidance.

Rationale: There are no provisions in the level 2 text for providing updates to the Agency regarding planned unloading/reloading once the file has been submitted prior to the start of the month. Additionally the Manual of Procedures specifically states: "The data element "IngPlannedUsageReport" is to be used by the Reporting Party to document expected usage of the facility over the next reporting period. The Reporting Party shall provide a monthly update of the planned usage of the facility, which details expected deliveries and planned reloading and unloading dates over the coming month".

**Answer**

In the Agency's view the report should be submitted once a month before the start of the relevant calendar month. As Commission Implementing Regulation (EU) No 1348/2014 does not foresee to report updates regarding planned unloading/reloading once the file has been submitted to the Agency, market participants or LSOs shall submit their report that was sent to the LSO on the last day of the month preceding the calendar month to which the report relates to.

Example: If the report on the planned unloading and reloading for the month of April is agreed with the LSO on 15 March and then amended on 29 March, market participants



(or the LSO on their behalf) should send their planned loading/reloading report (submitted on 29 March to LSO) to the Agency not later than on 31 March.

### Question 3.2.9

Which day/event shall be populated for gasDayStart and gasDayEnd fields in the LNG Participant Activity Report?

#### Answer

In order to populate the gasDayStart and gasDayEnd fields in the LNG Participant Activity Report, the Market Participant shall use the relevant records from the Cargo Discharge Log as a reference. The values shall reflect the gas day(s) during which the reloading or unloading occurred.

Example:

Cargo Discharge Log

2 December 2016 – 06:52 – Commenced Discharge

2 December 2016 – 19:38 – Completed Disconnecting Arms

gasDayStart: 2016-12-02T05:00:00Z (time depends on time zone)

gasDayEnd: 2016-12-03T05:00:00Z (time depends on time zone)

### Question 3.2.10

What should be provided for the unloaded LNG volume ('unloadedVolume' field) in the LNG Participant Activity Report?

#### Answer

Market Participants should report the unloaded volume as defined in their Terminal Access Contracts.

### Question 3.2.11

From the MoP on data reporting: "The LNG Unavailability Report should be provided by the LNG System Operator in accordance with Article 9(3) c. The data element "IngUnavailabilityReport" is used by the Reporting Party to identify **any periods where the facility is unavailable for the reloading and unloading of LNG to participants**, whether this is a planned or unplanned activity. To be sent as soon as information becomes available. The unavailability report is used to report any planned or unplanned unavailability of a facility for a gas day or period within a gas day. Each LNG System Operator shall identify the dates and time on which the planned or unplanned outages of the LNG facility occur and the capacity which is affected."

The bold part would refer to the jetty only. Does ACER really want to know the unavailability of the jetty?

**Answer**

According to Article 9 (3) (c) of Commission Implementing Regulation (EU) No 1348/2014 LNG, system operators shall report planned and unplanned unavailability announcements of the LNG facility including the time of the announcement and the capacities concerned.

The notion of LNG facility is defined in Article 2(33) of Directive (EU) 2024/1788 as a terminal which is used for the liquefaction of natural gas or the importation, offloading, and re-gasification of LNG, and includes ancillary services and temporary storage necessary for the re-gasification process and subsequent delivery to the transmission system, excluding any part of LNG terminals used for storage.

Therefore, any unavailability of the facility that falls within the definition of the LNG facility shall be reported with lngUnavailabilityReport.

## II.3.3 Storage

### Question 3.3.1

How shall corrections of GAS STORAGE data be reported?

#### Answer

Updates and/or corrections to any previously submitted data according to Article 9 (7) and 9 (9) of Implementing Regulation (EU) No 1348/2014 should be sent in a new file.

The date in the filename should correspond to the date the update and/or correction report is sent. Dates inside the file should refer to the date for which the updates or corrections are referring to.

### Question 3.3.2

There is uncertainty regarding the report of fundamental data under provisions of Article 9(7)(b) of Commission Implementing Regulation (EU) No 1348/2014.

- quote: „(b) amount of gas in stock at the end of the gas day, inflows (injections) and outflows (withdrawals) for each gas day,“

Our question is what does the amount of gas in stock mean:

a) Does it refer to the physical withdrawal/injection amount of gas which is measured in the storage facility entry/exit point?

or

b) Does the withdrawal/injection amount of gas refer to the sum of allocated quantities (for all users) under the accepted nominations?

There is a possibility that there could be a difference between the measured and allocated quantities which are daily recorded on the open balancing account between OSS and TSO.

Regarding the possible difference in amounts in case a) and case b) we need to know which data we send as fundamental data.

Regarding the mentioned above a connected issue is raised in Article 9(9) of Commission Implementing Regulation (EU) No 1348/2014.

- quote : „9. Market participants or Storage System Operators on their behalf shall report to the Agency and, at their request, to national regulatory authorities the amount of gas the market participant has stored at the end of the gas day. This information shall be made available no later than the following working day.“

If the SSO reports on behalf of his storage users the only possible data to report is allocated withdrawal/injection quantities (equal accepted nominations), because this is the amount used to reived the stored gas (users balance account) for each user on a daily basis.

We are concerned that there could be a slight difference in amounts regarding the fundamental data of the whole storage and the amounts per user level.

## **Answer**

In order to harmonize the reporting, both SSOs and MPs or SSOs reporting on behalf of MPs shall use allocated data/nominations for reporting according to Articles 9(7) and 9(9) of Commission Implementing Regulation (EU) No 1348/2014.

### **Question 3.3.3**

In relation to the Storage Participation Activity Report (Article (9) of Commission Implementing Regulation (EU) No 1348/2014), where a primary capacity holder at a storage site sells capacity to a third party allowing them to hold gas stock at a storage site, who is the market participant for the stock placed at site by the third party (the secondary capacity holder) for the purposes of this report?

Is it the primary capacity holder or the secondary capacity holder?

The TSO places gas (held for Operating Margins purposes) at a storage facility – sometimes this is through the purchase of capacity rights from an existing storage capacity holder. The TSO buys the gas (either for injection / as an in store transfer) to hold in store. Who is the market participant in this case?

We have had different interpretations from different parties ranging from:

- (a) It is the responsibility of the party who has legal title while the gas is in store (strictly speaking the storage operator)
- (b) It is the responsibility of the party who has contracted / secured primary capacity rights directly with the storage operator
- (c) It is the responsibility of the secondary capacity holder (in this case the TSO) to report.

## **Answer**

In the Agency's view the Market Participant responsible for reporting data according to Article 9 (9) of Commission Implementing Regulation (EU) No 1348/2014 in the above example is the secondary capacity holder – the TSO, since according to the Agency's understanding it is also the secondary capacity holder that makes nominations at the storage facility. The Storage System Operator (SSO) may report on behalf of the Market Participant. The SSO shall identify the Market Participant in the report.

### **Question 3.3.4**

Can you please confirm how the gasDayStart and gasDayEnd data fields should be reported for an entity reporting on UK activities in the Storage Participation Activity Report? The Agency's guidance for the fields says: The start of the gas day in UTC ISO8601 standard with an example YYYY-MM-DD 06:00 and The end of the gas day in UTC ISO8601 standard with an example YYYY-MM-DD 06:00 The TSO places gas for Operating Margins at UK storage facilities. For the avoidance of doubt can you please

provide clear instructions/examples on how as an entity reporting on UK activities should reference the start of the gas day and end of the gas day (including clock change). Following this standard we believe the referencing for gas day starting 21/04/16 for example should be: gasDayStart 2016-04-21 04:00:00Z gasDayEnd 2016-04-22 3:59:59Z

## Answer

If the time zone for the reported facility is in the UK and the gas day starts at 5:00 am local time then the correct start and end time is the following:

During Summer Time	Or
gasDayStart 2016-04-21 04:00:00Z	2016-04-21 05:00:00+01:00
gasDayEnd 2016-04-22 04:00:00Z	2016-04-22 05:00:00+01:00

During Winter Time	Or
gasDayStart 2016-11-21 05:00:00Z	2016-11-21 05:00:00+00:00
gasDayEnd 2016-11-22 05:00:00Z	2016-11-22 05:00:00+00:00

This answer applies by analogy to other markets, depending on their time zone, where storage data are still reportable under REMIT.

## Question 3.3.5

Should fundamental data be reported during the decommissioning and the blowdown phase, and if so, how?

During the decommissioning phase, there are no commercial contracts applicable, which is why the facility report values are zero. However, in some types of storage facilities, as part of the blowdown / decommissioning phase, cushion gas should be withdrawn from the storage and sold to the market.

Should fundamental data be reported until cushion gas is taken out? Or is transaction reporting for the sale of the cushion gas sufficient?

If fundamental data reporting is still necessary, our understanding is that the total volumes DTMTI, DTMTW, DTMTS, storages volume, injected daily volume und withdrawn daily volume should be zero. Should the daily withdrawal volume show the volumes of cushion gas and the other requested data be reported as zero only in case of a cushion gas takeout?

## Answer

The cushion or base gas (permanent inventory in a storage reservoir) should not be counted as a normal working gas volume. The Agency's understanding is that the removal of cushion gas is the last step of the decommissioning phase.

If there are no commercial activities during the decommissioning phase and cushion gas is still in a storage reservoir, the SSO should report zero values "0" in the fields:

storage, injection, withdrawal, technicalCapacity, contractedCapacity, availableCapacity of Storage Facility Report until cushion gas is sold/taken out.

When cushion gas is sold/taken out, the Agency's understanding is that the SSO has to make nominations and report movements of gas via the "withdrawal" field in the Storage Facility Report. Fields storage, injection, technical, available and contracted capacity of the storageFacilityReport should be reported with zero values "0".

If the SSO needs to, for example, inject gas for operational purposes during the decommissioning phase, the Agency's understanding is that the SSO has to make nominations and report movements of gas via the "injection" field in the Storage Facility Report. Fields storage, withdrawal, technical, available and contracted capacity of the storageFacilityReport should be reported with zero values "0".

### Question 3.3.6

Reporting negative values for available capacity due to overbooking.

(available capacity = (technical capacity) – (contracted capacity)).

Should available capacity, in case of overbookings, be reported with a negative value, or should overbooked capacities not be taken into account?

The contracted capacity, which is reported within fundamental data reporting, is the sum of the sold firm and interruptible capacities. But to calculate the available capacity, we expect that the contracted capacity (used in the calculation) is purely the firm capacity, since the available capacity shows "only" the firm available capacities that will definitely be available to the market. It makes no sense from our perspective to publish available interruptible capacity because this may change very often with regard to the usage of the storage facility and because it depends on the decisions taken by SSOs and their willingness to risk interruption.

In that case, a negative value of the available capacities could only appear if the firm capacities are oversold. Please confirm.

#### Answer

In the Agency's view the stakeholder is describing two possible options:

**Option 1** - Available interruptible capacity is NOT offered by the SSO to the market in which case the following calculation applies:

Contracted capacity = sold firm + sold interruptible capacity

Available capacity = technical capacity – contracted (only sold firm) capacity

In this case the available capacity cannot be negative. It can be  $\geq 0$ .

**Option 2** - Available interruptible capacity is offered by the SSO to the market in which case the following calculation applies::

Contracted capacity = sold firm + sold interruptible capacity

Available capacity = technical capacity – contracted (sold firm + sold interruptible) capacity.

In this case the available capacity can be negative. It can be  $\leq 0$ .

## III. Frequently Asked Questions (FAQs) on REMIT inside information collection

### III.4. General Questions

#### Question 4.1.1

Does the MoP on data reporting describe how to disclose inside information?

#### Answer

A distinction should be made between the data collection under Article 8 of REMIT and the disclosure of inside information to the general public under Article 4(1) of REMIT. The scope of the MoP (section 7 on the 'Inside Information Reporting') is not the disclosure of inside information but the provision of web feeds that enable ACER to collect such information in an efficient way. The REMIT Implementing Regulation in its Article 10(1) and (2) on 'reporting procedures' defines rules for the provision of such information to the Agency through web feeds. The revised version of the 'MoP on data reporting' by the Agency addresses only the standards that should be used for the reporting of such information via web feeds to the Agency.

#### Question 4.1.2

Shall I open my web-feed for the public?

#### Answer

According to Article 10(1) of the REMIT Implementing Regulation, the requirement to provide the feeds is towards the Agency. However, in order to further increase wholesale market transparency, and as per the Agency's Guidance on the application of REMIT, the Agency requires platforms for the disclosure of inside information to make their web feeds available for all stakeholders.

#### Question 4.1.3 [DELETED]

#### Question 4.1.4

In case the web-feed is made available both on the market participant's own website and on an inside information platform on behalf of the market participant, from which source ACER is going to retrieve the UMM data?

#### Answer

The source of UMM collection by the Agency are inside information platforms. According to Article 4(1), subparagraph 2 of REMIT, market participants shall disclose the inside information through IIPs. As the definition of IIPs in Article 2(17) clarifies, IIPs are

responsible for the reporting of disclosed inside information to the Agency on behalf of market participants.

## Question 4.1.5

Do I have to send my disclosed inside information to the Agency?

### ANSWER

According to Article 10(1) of Commission Implementing Regulation (EU) No 1348/2014 on 'Reporting procedures', inside information should be collected by the Agency through a specific method: web feeds. In the 'MoP on data reporting', the Agency explains in Chapter 3 that "*disclosed inside information made available through web feeds is collected by ARIS<sup>1</sup> via a pull mechanism.*"

Therefore, inside information should not be sent to the Agency. The collection point is the web feed of the inside information platform.

Market participants are expected to indicate the inside information platform they use in Section 1 of its registration form provided according to Article 9 of REMIT.

According to Article 9(5) of REMIT market participants are required to keep the registration fields updated.

## Question 4.1.6

Could the Agency clarify if, on 1 January 2017, inside information web feeds will be collected from third party inside information platforms and from market participants or only from third party inside information platforms?

### Answer

The Agency is collecting inside information solely from web feeds of inside information platforms that publish Urgent Market Messages (UMMs) on behalf of market participants. The list of inside information platforms is available at <https://www.acer-remit.eu/portal/list-inside-platforms>.

According to Article 4(1), subparagraph 2 of REMIT, market participants shall disclose the inside information through IIPs.

## Question 4.1.7 [DELETED]

## Question 4.1.8

---

<sup>1</sup> Agency's REMIT Information System



Where the "other market information" schema (annex VII .111) is produced by a market participant – does this require reporting through the "Storage Unavailability report" (pg 69)?

Our interpretation is that the "storage unavailability report" will not be sent where we are reporting "other market information".

### **Answer**

The "Storage Unavailability Report" is designed for reporting of fundamental data according to Article 9(5) of Commission Implementing Regulation (EU) No 1348/2014 while the "Other market information" is designed for inside information reporting according to Article 10(1) of Commission Implementing Regulation (EU) No 1348/2014. The reporting of the "Other market information" report does not replace the obligation to provide the "Storage Unavailability Report".

### **Question 4.1.9**

Thank you for the clarifications made in the FAQ on REMIT fundamental data and insider information collection.

Related to question 5.1.8 I have another question. According to the answer, all events shall be reported as per affected unit. This means that one event that affects three units shall be reported in three unique web feed messages.

Now considering the case of an event affecting one unit but with a time varying capacity (e.g. three different values for capacity for the different time frames). Shall this event also be reported as three separate web feed messages each containing only one capacity value?

Our proposal earlier in this case was to only report the lowest capacity value. That solution would mean that one event maps to one web feed message. Depending on your answer to the question above, the alternative would be to map one event with three web feed messages when we have time varying capacity. In any case, our design is highly dependent on a clarification of the raised point and I hope you are able to give some guidance on this matter.

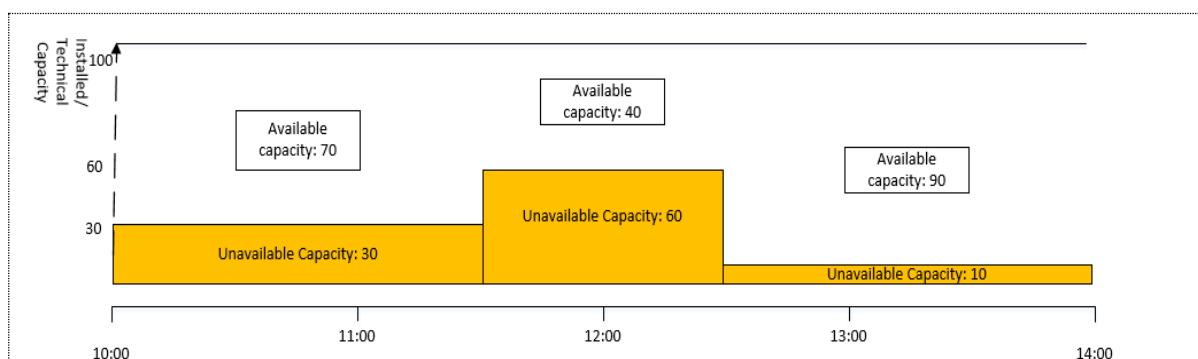
### **Answer**

- 1) For UMMs related to unavailability of gas facilities and 'other market information':

*Planned unavailability:* three separate UMMs are published for each of the three intervals.

The three messages should be published with the same timestamps unless they are different events.

*Unplanned unavailability:* one UMM is published (e.g. at 10 am). The UMM will be updated at 11:30 am and 12:30 pm. The three messages should have different timestamps.



## 2) For UMMs related to unavailability of electricity:

If the available/unavailable capacity fluctuates over time, information on the time interval (interval start and stop) and available/unavailable capacity should be reported via Data Field No (20) Interval Start and Data Field No (21) Interval Stop.

### Question 4.1.10

Does the Agency need to be aware about the point direction for which the affected capacity is announced? If yes, how this information shall be provided through XML based on UMM Schema No 2 "Unavailabilities for gas facilities"?

The format for the XMLs for "Unavailabilities for gas facilities" (Schema No2) does not contain attribute for the point direction.

In the context of publication of unavailabilities for gas facilities, an "Affected asset or units" could be the connection point (cross-border, interconnection point, delivery point, measurement point etc.). In case that the affected point is bidirectional, the point 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.

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.

### Answer

As per the format for the reporting of UMMs related to unavailability gas facilities defined in Annex VII of the Manual of Procedures on Data Reporting, Data Field No (15/b) Direction should be used to indicate if the outage is at the entry or exit direction in relation to the specified Balancing Zone.

**Question 4.1.11** [DELETED]

**Question 4.1.12** [DELETED]

**Question 4.1.13** [DELETED]

### Question 4.1.14

Unavailability of unit EIC for gas consumption units (inside information).

Field 16 requires an EIC for the identification of a physical asset. We received the information from market participants that the EIC issuing body for gas consumption units in Germany is not able to provide those codes before the end of 2016 or beginning of 2017. Therefore, it is rather likely that those codes are not available.

The issue does not refer to power production, storage or consumption units where code availability is no problem.

The respective field 16 would remain empty. We suggest to allow us to provide the inside information without EIC on a temporary basis.

### **Answer**

The above proposal is reasonable. Once the EIC codes are available they should be provided in the UMMs collected by the Agency.

### **Question 4.1.15**

When will the Agency start collecting inside information web feeds from individual Market Participants' websites?

### **Answer**

The Agency is not collecting web feeds from Market Participants' websites.

According to Article 4(1), subparagraph 2 of REMIT, market participants shall disclose the inside information through IIPs. As the definition of IIPs in Article 2(17) clarifies, IIPs are responsible for the reporting of disclosed inside information to the Agency on behalf of market participants.

### **Question 4.1.16**

How should this particular event be presented for inside information reporting on LNG deliverability restrictions (within UMM)?

Case: the event lasts more than one gas day.

- Event start: 2015-11-06 01:00 (am)
- Event stop: 2015-11-08 18:00

The event lasts 3 gas days and contains 3 sub-periods that differ in the number of the affected hours and the values of the availability and unavailability per day as follows:

Technical availability in normal circumstances:  $(6,78 \text{ GWh/h} \cdot 24\text{h}) = 162,72 \text{ GWh}$  per gas day

o 5 hours during the 1st gas day, the unavailability is 33,9 GWh

o 24 hours during the 2nd gas day, for 24 hours the unavailability is  
162,72 GWh

o 12 hours during the 3rd gas day, the unavailability is 81,36 GWh

The values of the availability and unavailability could vary each sub-period.

Gas day:	2015-11-06		2015-11-07		2015-11-08	
	Availability GWh/h	Unavailability GWh/h	Availability GWh/h	Unavailability GWh/h	Availability GWh/h	Unavailability GWh/h
Gas hour:						
6	6,78	0	0	6,78	0	6,78
7	6,78	0	0	6,78	0	6,78
8	6,78	0	0	6,78	0	6,78
9	6,78	0	0	6,78	0	6,78
10	6,78	0	0	6,78	0	6,78
11	6,78	0	0	6,78	0	6,78
12	6,78	0	0	6,78	0	6,78
13	6,78	0	0	6,78	0	6,78
14	6,78	0	0	6,78	0	6,78
15	6,78	0	0	6,78	0	6,78
16	6,78	0	0	6,78	0	6,78
17	6,78	0	0	6,78	0	6,78
18	6,78	0	0	6,78	6,78	0
19	6,78	0	0	6,78	6,78	0
20	6,78	0	0	6,78	6,78	0
21	6,78	0	0	6,78	6,78	0
22	6,78	0	0	6,78	6,78	0
23	6,78	0	0	6,78	6,78	0
24	6,78	0	0	6,78	6,78	0

1	0	6,78	0	6,78	6,78	0
2	0	6,78	0	6,78	6,78	0
3	0	6,78	0	6,78	6,78	0
4	0	6,78	0	6,78	6,78	0
5	0	6,78	0	6,78	6,78	0
	=128,82 GWh	= 33,9 GWh	= 0 GWh	= 162,72 GWh	= 81,36 GWh	= 81,36 GWh

According to the Manual of Procedures (MoP) on data reporting: ANNEX VI Fundamental data reporting, VI.V XML SCHEMA FOR LNG DATA document, presentation of this event for LNG data on unavailability (within the fundamental data reporting to ACER) is:

Case:

- Event start: 2015-11-06 01:00 (am)
- Event stop: 2015-11-08 18:00
- o 5 hours during the 1st gas day, the unavailability is 33,9 GWh
- o 24 hours during the 2nd gas day, for 24 hours the unavailability is 162,72 GWh
- o 12 hours during the 3rd gas day, the unavailability is 81,36 GWh

Then unavailability =  $(33,9 \text{ GWh} + 162,72 \text{ GWh} + 81,36 \text{ GWh}) / 3 \text{ gas days} = (277,98 \text{ GWh}) / 3 \text{ gas days} = 92,66 \text{ GWh/d}$

Unavailability = average *per gas day* is 92,66 GWh/d

According to the Manual of Procedures (MoP): ANNEX VII Data fields for inside information reporting, UMM schema II. and FAQs on REMIT fundamental data and inside information collection (3<sup>rd</sup> edition, 15 November 2016) documents, the presentation of this event for inside information reporting on LNG deliverability restrictions (within UMM) should be:

There are three events and three UMMs are published:

The first UMM: 001\_001

1) Event start: 2015-11-06 01:00 (am) – event end: 2015-11-07 05:59:

- the unavailability is 6,78 GWh/h \* 5h = 33,9 GWh
- the availability is 6,78 GWh/h \* 19h = 128,82 GWh

The unavailability for the first gas day is 33,9 GWh

The second UMM:002\_001

2) Event start: 2015-11-07 06:00 – event end: 2015-11-08 05:59

- unavailability is  $6,78 \text{ GWh/h} * 24\text{h} = 162,72 \text{ GWh}$
- the availability is  $6,78 \text{ GWh/h} * 0\text{h} = 0 \text{ GWh}$

The unavailability for the second gas day is 162,72 GWh

The third UMM:003\_001

3) Event start: 2015-11-08 06:00 - event stop: 2015-11-08 18:00:

- the unavailability is  $6,78 \text{ GWh/h} * 12\text{h} = 81,36 \text{ GWh}$
- the availability is  $6,78 \text{ GWh/h} * 12\text{h} = 81,36 \text{ GWh}$

The unavailability for the second gas day is 81,36 GWh

Conclusion:

For this particular event:

- ACER receives information within fundamental data reporting that the unavailability is, on average, 92,66 GWh per gas day for the whole event.

The market within UMM publications (and ACER within RSS for UMMs) receives information that the unavailability is respectively: 33,9 GWh (for the first gas day), 162,72 GWh (for the second gas day) and 81,36 GWh (for the third gas day).

### Answer

#### 1. Fundamental Data reporting

MoP on data reporting: The unavailability report is used to report any planned or unplanned unavailability of a facility for a gas day or period within a gas day. The unavailableCapacity shall be reported with a GWh/d unit.

In the example provided above one lngUnavailabilityReport shall be sent to the Agency:

lngUnavailabilityReport

- unavailabilityStart: 2015-11-07 01:00 - unavailabilityEnd: 2015-08-18:00
- unavailableCapacity:  $6,78 \text{ GWh/h} * 24\text{h/d} = 162,72 \text{ GWh/d}$

#### 2. Inside Information

This is one event:

- Event start: 2015-11-07 01:00 - Event stop: 2015-11-08 18:00
- the unavailable capacity is  $6,78 \text{ GWh/h} = 6,78 \text{ GWh/h} * 24\text{h/d} = 162,72 \text{ GWh/d}$

Please note the recent update of the MoP on data reporting v 4.0; the GWh/d unit can be selected for LNG deliverability restrictions events.

### Question 4.1.17

The requirements for the obligation to disclose inside information have been clarified and supplemented in chapter 7 of the fourth update of the 4th Edition of the ACER Guidance. These requirements should be fully complied with after a transition period, which will be communicated by the Agency. By which date should market participants comply with these requirements?

**Answer**

In order to provide market participants with an appropriate time to not only implement necessary changes regarding the disclosure mechanisms for the disclosure of inside information through platforms, but also to comply with the minimum quality requirements for an effective disclosure of inside information as laid down in the ACER Guidance, market participants should fully comply with the requirements of the ACER Guidance as of 1 July 2020.

**Question 4.1.18 [NEW]**

In the framework of the obligation to report inside information related to the unavailability of capacity engaged in balancing markets, which schema of Urgent Market Messages is applicable to electricity Virtual Power Plants (which can aggregate several technologies such as DER, storage, demand response, etc.)?

**Answer**

In case of disclosure of inside information, the assets in VPPs usually have low capacity but (combined) in an aggregated way, the VPP can exert influence on the wholesale energy market and its prices.

Provided that the event is a reportable UMM, depending on the VPP arrangements the UMMs may be disclosed using schema III for UMMs. Data Field 13 Remarks should be used to provide all the relevant information. In particular, it should contain the name of the affected product, e.g. the name of the balancing product impacted by the unavailability.

## III.5. Questions Related to the Data Fields

### Question 5.1.1

Are message versions 100% immutable or not? Is it possible to update the status of a message by updating the status of the latest thread item?

#### Answer

Published versions of the messages are 100% immutable and any change that may occur needs to be published as a new updated version. Any update or change in the data fields – including Data Field (2) Event Status - will result in a new message, with a new 'Version number'.

### Question 5.1.2

Shall the version number - that is part of the 'Message ID' - be incremented with any update to the UMM thread? If so, will the increment of version number always result in a new UMM published to RSS/Atom feed?

#### Answer

As explained in the MoP Annex VII each 'Message ID' includes 29 characters in total and consists of 3 parts:

- 'UMM thread ID' - 25 characters
- One underscore ('\_')
- 'Version number' - 3 characters

Underscores ('\_') should not be used within the 25 characters of the UMM thread and also it shall not be possible to submit a message with a 'Message ID' of less than 29 characters in total.

Any change in the UMM results in a change on the 'Message ID'. If the same UMM thread is considered, the change will impact the last part of the ID which is the UMM 'Version number'. It is the responsibility of the reporting parties to put in place appropriate arrangements ensuring proper sequencing of this number.

### Question 5.1.3

How to use the field "Event Status"?

#### Answer

The UMM schema describes the use of three status values that are defined in the following way:

1. 'Dismissed' – for situations of cancellation or withdrawal of the message and when the message was updated.
2. 'Inactive' – UMM that contains the most recent update of an event that has already occurred in the past.



3. 'Active' – UMM that contains the most recent update on an event that will occur in the future or is occurring.

To smooth the implementation process the Agency will give additional freedom to use the "Event status" field values in the following way:

1. 'Dismissed'
  - The change of the "Event Status" in the web feed is only obligatory in case of cancellation and withdrawal: when a message is withdrawn as erroneous, or the event of the message is cancelled then the status of the UMM has to be changed to 'Dismissed'.
  - In case the parameters of the UMM change, i.e. a new version is published, the "Event Status" of the original UMM does not have to be changed to 'Dismissed'.
2. 'Inactive'
  - It is not obligatory to use this status value when the date and time of the event has expired, the status value 'Active' can be maintained for these UMMs.
3. 'Active'
  - This value remains the default value for UMMs.

This approach will not only ease the work of the data providers but will also limit the amount of messages initially expected to be received.

#### Question 5.1.4

Field (4/a) Type of Event includes as accepted value the option "Other unavailability". What kind of assets or units can such a UMM refer to?

##### **Answer**

The selection "Other unavailability" is used when the available values 'production', 'consumption' or 'transmission unavailability' are not appropriate. For example, such event could refer to an electricity storage unit unavailability.

#### Question 5.1.5

Consumption unit, injection and offtake capacity of gas storage facilities has thermal capacity in MW. How can it be measured in other units?

##### **Answer**

If the time element of the event is considered, the thermal capacity can be converted into units of energy. For a consumption unit, the unavailable capacity is the total technical capacity which cannot be used in the period of the outage, even if under normal circumstances it is not utilised at full capacity.

The time element of an event allows for the conversion from units of power into units of energy. Further, storage withdrawal and injection capacity availabilities can be expressed in MWh/d.

Using GWh/d or MWh/d is the general practice for measuring outages in the gas market.

Example on how to convert MW into MWh/d for a loss in the gas consumption: Assuming we have a gas power plant with a technical capacity of 200 MW and a net efficiency of 46%. If this unit would be completely unavailable it would result in an unavailable capacity of  $200\text{MW} \times 24\text{h} / 0.46 \approx 10435 \text{ MWh/d}$ .

However, for a five minute partial outage in which the average unavailability will be a rough estimate the extrapolation for the whole day may be somehow less accurate. Nevertheless, according to the samples collected by ACER the number of outages which lasted less than half an hour was extremely low in recent years. Therefore, based on the evidence currently available, ACER does not see a need to expand the list of available units of measurement with MW for gas related UMMs.

### Question 5.1.6

Should the measurement unit be identical for all fields?

#### Answer

For fields (9) "Unavailable Capacity", (10) "Available Capacity" and (11) "Installed capacity" the unit of measurement is by default the same. A single unit of measurement is selected in data field (8) "Unit of measurement" for field (9), (10) and (11).

### Question 5.1.7

In relation to data fields number 12 (Reason of Unavailability) and 13 (Remarks) as displayed in Annex VII to the Manual of Procedures on data reporting, is it required to translate values from native language into English?

#### Answer

In order to disseminate the inside information 'efficiently', the use of English is a best practice commonly used by stakeholders across Europe. Also, in line with the ACER Guidance on the application of REMIT, "*the information should be published in the official language(s) of the relevant Member State and in English or in English only*".

Therefore, the Agency believes that the market participant should disclose, and the inside information platform should publish, inside information in the official language(s) of the relevant Member State and in English or in English only.

### Question 5.1.8

Regarding fields 16 ("Affected Asset or Unit") and 17 ("Affected Assets or Unit EIC Code"), shall market participants submit only one message when there is an event that affects several units or assets due to the same reason?

#### Answer

If the UMM disclosed publicly refers to more than one facility, and as the schema for

reporting only allows the identification of one facility per web feed message, the message needs to be disaggregated by facility for data collection purposes. Another option is to use a single web feed message according to the 3<sup>rd</sup> schema type – “Other market information” in case the event affects a large number of facilities (e.g.: in case of general strike, floods affecting hydro generation etc.).

### Question 5.1.9

Could you advise us how to fill the field 10 “Available Capacity” in case of overlapping partial unavailability? Or could you reconsider to make the field “Available Capacity” optional?

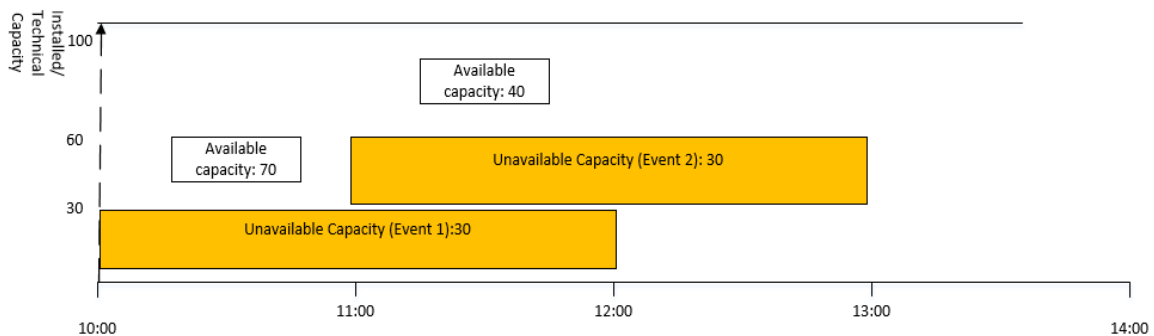
#### Practical Example

A generation, production, or consumption unit may have different, overlapping unavailabilities with different reasons, types, start and end dates. In such cases, the “available capacity” of the entire facility may change over the duration of an individual event. Since a reader can easily calculate the available capacity from the fields 9 and 11/a-11/b by aggregating over all open events at a certain point in time, requiring field 10 does not add any further information.

In our opinion, field 10 should be optional, as any mandatory usage of the field could be misleading.

#### Answer

Please find below the graphical representation of two overlapping unavailabilities with different start and end dates including examples on how to populate UMM reports:



#### UMM Reports:

10 am

1<sup>st</sup> Report (Event 1)

Message ID:12345-28X-TradingAG-BR-C\_001

Event Start and Stop: 10 and 12pm

Available capacity: 70

Unavailable capacity:30

11 am

2<sup>nd</sup> Report (Event 2)

Message ID:12345-28X-TradingAG-SD-D\_001

Event Start and Stop: 11 and 1pm

Available capacity: 40

Unavailable capacity: 30

Optional: "Remarks" field in the 2<sup>nd</sup> Report: "Additional Unavailability to ID:12345-28X-TradingAG-BR-C\_001"

### Question 5.1.10

In the Agency's Manual of Procedures, v.3 and 4, in the part describing the requirements of the attributes of the two types of UMM XMLs, the description of the "**Message ID**" attribute says:

*"The field 'Message ID' consists of two parts: 'UMM thread ID' and 'Version Number' separated by the underscore character. 'Message ID' = 'UMM thread ID'\_'Version Number'*

*'UMM thread ID'part is the identifier of a series of UMMs reporting on the same event after potential updates. The 'UMM thread ID'remains unchanged even if the UMM is updated. The format of the '**UMM thread ID'part is to be set by the entity disclosing the information but should include no more than 25 alphanumeric characters.***

*'Version Number' is the unique identifier of UMM versions in a single UMM thread. It helps to reconstruct the history of prior publications. 'Version Number' consists of a sequential number with 3 numeric characters where 001 stands for the first UMM in a thread, 002 marks the first update, 003 the second update and so on."*

Context of the question:

- UMMs publication by an MP on any Platform for Inside Information publication **and** on its own web-site;
- Definition of convention for creation of the "UMM thread ID" part of the "Messaged ID".

Question:

How should we interpret the requirement: *"The 'UMM thread ID'part is the identifier of a series of UMMs reporting on the same event after potential updates. The 'UMM thread ID'remains unchanged even if the UMM is updated. The format of the '**UMM thread ID'part is to be set by the entity disclosing the information'?"***

Who should define the 'UMM thread ID' – the MP or the Platform for publication of inside information? Do you require the published 'UMM thread ID' and the one submitted to ARIS to be one and the same?

In case that an MP would like to publish UMMs on its own web-site and on a Platform for disclosure of Inside information, it is reasonable to expect the Message ID for both publications for one and the same event to be equal.

One interruption event of gas infrastructure may affects many assets or units (points). If an MP publishes one single UMM for one event, including all of its affected points, both on its own web-site and on a Platform for Inside Information disclosure,

- According to the Agency's Manual of Procedures' requirements, the information for every single affected asset or unit shall be made available via web-feeds to the Agency by individual XMLs.

Possible approaches:

Taking the above-mentioned into consideration, the Platform operator would have two options for identifying the messages submitted/made available via web-feeds to the Agency:

1. The Platform operators uses the Message ID ('UMM thread ID') provided by the MP for the UMM publication and replicates it for all XMLs for each affected by an event assets or units (points). Thus, in case of several affected points within one event, there will be several UMM XMLs (made available via web-feeds to the Agency) with one and the same Message ID ('UMM thread ID'). It will still be possible to differentiate them via the "Affected asset or unit name" attribute content.

or

2. The Platform operator generates completely new Message ID for every single XML (made available via web-feeds to the Agency), per affected asset or unit (point) by an event. The Message IDs (  
( with the original Message ID ('UMM thread ID'), used for the UMM publication on the MP web-site and on the Platform for Inside Information disclosure. It could be possible to see both Message IDs when accessing the published UMMs on the Platform operator/MP website, but the XMLs made available to the Agency will contain only the Message ID ('UMM thread ID') defined by the Platform operator.

### **Answer**

The Message ID is to be set either by a Market Participant or the entity disclosing the information on behalf of the Market Participant. The Message ID shall be unique per XML, thus if multiple assets are affected by the same event each XML specifying the affected asset will have its unique Message ID.

### **Question 5.1.11**

Separation of more than one market participant or market participant codes (inside information).

Field 17 allows to indicate more than one market participant. It is not clear how different names shall be separated if the unit concerned is owned by various market participants.

Field 18 refers to the market participant code. We were of the opinion that various names in field 17 would have to be accompanied by the same number of market

participant codes in field 18. However, the number of eligible character leaves it open whether this is really meant.

There might be owners of a unit who do not have a market participant code such as pension funds. It is not clear who to indicate that.

We suggest using a semicolon ";" in fields 17 and 18 for the separation of different market participants and different market participant codes. If a market participant has no code, we recommend to use "NA".

This makes sure that there is always the same number of owners and respective codes or respective "NA" and helps to cross-reference publications for any market participant if needed.

### **Answer**

Fields 17 and 18 are unbounded in the XML schema meaning that you can repeat multiple values (multiple MPs' names and EIC codes) inside the schema. The number of Market Participants in field (17) 'Market Participant' has to be the same as the number of EIC codes provided in field (18) 'Market Participant code'. The obligation to publish inside information rests with the Market Participant. If the unit's owner is not a Market Participant, then it should not be reported in fields (17) and (18).

## **Question 5.1.12**

ANNEX VII p77/90 Data Field No. 4b Type of Event – It would appear that we can only select one value. As a SSO where we have a TOTAL outage, does this mean that we have to report the loss of injection and withdrawal capacity separately? Hence we would have 2 UMMs for the same event detailing loss in both directions?

In the case of bidirectional sites we would expect to see loss of capacity in both directions on a single UMM however we have interpreted the Data field above as 2 UMMs reporting loss of availability, one for injection and one for withdrawal.

### **Answer**

In case of a total outage of a gas storage facility when a loss of both injection and withdrawal capacity occurs, the value 'Storage unavailability' shall be provided in the (4/b) Type of Event field. The value 'Storage unavailability' represents a combination of both 'Injection unavailability' and 'Withdrawal unavailability' and hence only 1 UMM is reportable for a total outage.

## **III.6. Technical Questions**

### **Question 6.1.1**

Will ACER provide a testing environment for market participants to test the exchange of UMM information prior to releasing the web feed into production? Will ACER validate and report back to the platform whether information is generated correctly in the web feed?

### **Answer**

The Agency will not provide testing arrangements for individual market participants and no automated feedback mechanism will be implemented to provide receipts for non-compliant messages. Nevertheless, the Agency reserves the right to contact reporting

entities on performance issues on an ad hoc basis. Please note that recurrent issues will be reported to NRAs for appropriate action.

## Question 6.1.2

Can the Agency provide technical specifications that describe how ACER's system will connect to platform's RSS feed and what kind of information the RSS feed will extract?

### Answer

Please consult the REMIT Guidance on the implementation of web feeds for Inside Information Platforms.

## Question 6.1.3

How ACER will pull the information from the UMMs published on market participants' or service providers' web-sites?

### Answer

Market participants are required to provide the URL address where they publish inside information in the registration for REMIT purposes under the field 'Publication of inside information' according to Article 9 of REMIT. The web feed should be located in the exact same web page used for the disclosure of inside information.

According to Article 9(5) of REMIT market participants are required to keep the registration fields updated. Failure to do so will constitute a breach of REMIT and will not allow the Agency to adequately collect the information included in the web feed. The field in Section 1 of the registration form should, therefore, include the exact location of the web feed. A generic reference to a homepage of a website is not considered by the Agency as a complete fulfilment of the registration obligation.

## Question 6.1.4

Does ACER intend to apply automation in the collection and storage of the information published through the means of UMMS?

### Answer

Automated pulling of data will be applied by ACER while ATOM and RSS technologies will be supported at the same level.

## Question 6.1.5

Are the standards for the format of the UMMs (fields, fields content, type, length, accepted values) valid for the publication of the messages or the Agency requires to pull this information through XML files generated by the RSS provided on the respective website?

**Answer**

The data fields and electronic formats for the reporting of inside information provided in the Manual of Procedures for Data Reporting only apply to the web-feeds. The Agency will be collecting UMM data via XML files based on the recommended XSD generated by the stakeholders web feeds.

**Question 6.1.6**

What is the Agency's expectations about the delivery and storage of the RSS feeds?

**Answer**

As chapter 7 of the MoP on data reporting states that UMM via the web-feed should be provided at the time of the disclosure of the inside information. As for storage, UMMs reported to the Agency should be stored for a time period of at least 90 calendar days after submission via the web-feeds.