



# **ACER Public Consultation on a Common Schema for the Disclosure of Inside Information**

Enagás comments

26 June 2015



## Common Schema for the Disclosure of Inside Information

### **Natural Gas**

#### **1. Questions related to the proposed schemas**

1. Enagás would like to point out that comments provided only apply to the disclosure of inside information related to natural gas, including transmission, storage and LNG.
2. Enagás agrees that the use of only one message for the gas industry is more efficient from a data exchange and IT perspective.

**1. Would you add any other field not included in the current proposal? If so, please explain your reasoning**

3. Enagás believes that no additional fields should be added.

**2. Would you remove any field represented in the current proposal? If so, please explain your reasoning.**

4. Yes. Enagás proposes to remove the following fields of the tables in page 9 of ACER's consultation paper:
  - Field N° 14 "Decision time" should be deleted. It is difficult to determine the exact decision time of the unplanned outage. The decision process in large companies can be very complex and the obligation to include it can create a lot of administrative burden and bureaucracy. Furthermore, it does not provide for meaningful information.
  - Field N° 20 "Impact on emission allowance prices" should be deleted. From the point of view of an infrastructure operator, the evaluation would be difficult and could create a misleading sign to the market.

**3. Would you change any of the descriptions, accepted values or applicability? If so, please explain your reasoning. Are the schemas or values that you are suggesting based on any industry standard? Which one(s)?**

5. Yes. Enagás proposes to change the following fields of the tables in page 9 of ACER's consultation paper:
  - Field N° 2 "Update ID" should be deleted: Regulation 1227/2011 foresees that infrastructure operators shall publish the unavailabilities of their infrastructures. However it does foresee that the updates of the unavailabilities shall also be published.

- Furthermore, the example is not appropriate for the natural gas market because it's not possible that an unplanned outage becomes a planned outage.
- Field nº3 "Event Status" (gas and electricity capacity and 'other') should be deleted: same comment as for field number 2. Only those "Original" UMM should be published. There is no obligation to publish the updated of the unplanned unavailabilities.
- Field Nº 4/b "Message type": this field should also contain the choice "Other" because is not possible to standardize ex ante any possible event affecting wholesale energy price. The Field No 17 "Remarks" will be used for the explanation of the event. In addition there are further events, not mentioned in the list of accepted values, such as:
  - technical problems in IT-systems of booking capacity platforms;
  - technical problems in IT-systems of Infrastructure Operators;
  - etc.
- Field No 10/b "Unavailable Capacity: this field should be optional. In many cases the exact value or even an estimate can't be given in case of an unplanned event. Furthermore outages of platforms or IT failures in Infrastructure Operator's backend systems can't be expressed in a concrete number of unavailable capacity. In addition Enagás prefers to use the units included in the schemas.
- Field Nº 11/b "Available Capacity" should be optional. Please refer to the above mentioned field unavailable capacity. In addition Enagás prefers to use the units included in the corresponding schemas.
- Field Nº 12/b "Nominal Capacity" should be optional. The TSOs consider the "nominal capacity" as the technical available capacity. In addition Enagás prefers to use the units included in the corresponding schemas.
- Field Nº 16 "Event stop" this field should be optional or provide the possibility to publish "unknown". In many cases a valid estimation for the end of an event cannot be given;
- Field Nº 17 "Remarks": the field should be renamed as "UMM description"

## **2. Questions related to the proposed schemas**

**4.** Do you agree with the use of RSS or ATOM feeds to fulfil the requirement under Article 10(1) of the REMIT Implementing Regulation?

- Enagás agrees with the possibility to publish UMM in either of the solutions.