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Agency for the Cooperation of Energy
Regulators
Trg republike 3
1000 1000 Ljubljana, Slovenia


Gas Transmission Operator GAZ-SYSTEM S.A. response to ACER public consultation "on the Common Schema for the Disclosure of Inside Information"

- 1. Would you add any other field not included in the current proposal? If so, please explain your reasoning.**
GAZ-SYSTEM S.A. considers that there isn't need of additional fields in ACER proposal.
- 2. Would you remove any field represented in the current proposal? If so, please explain your reasoning.**
- Field No 17 b) "Affected point EIC Code": should be deleted. From GAZ-SYSTEM S.A.'s point of view the unique market participant code or ACER registration code is sufficient.
 - Field No 14 "Decision time": should be deleted. The field doesn't provide additional or meaningful information for the market.
 - Field No 20 "Impact on emission allowance prices": should be deleted. From GAZ-SYSTEM S.A.'s point of view the evaluation would be difficult and could create 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)?**
- Field No 4/b "Message type": should contain also the choice "Other" because it is not possible to standardize ex ante any possible event affecting wholesale energy price.
 - Field No 10/b "Unavailable Capacity": should be optional or provide possibility to publish "unknown". In many cases the exact value or even an estimate can't be given in case of an unplanned event. Furthermore outages or IT failures can't be expressed in a concrete number of "Unavailable Capacity". In addition GAZ-SYSTEM S.A. prefers to use as measurement unit the "kWh/h" instead of "MWh/d".

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Gas Transmission Operator GAZ-SYSTEM S.A.
ul. Mszczonowska 4
02-337 Warszawa, Poland
phone +48 22 220 18 00; fax +48 22 220 16 06

Share Capital: 3 771 990 842 PLN Paid-in Capital: 3 771 990 842 PLN Bank Account: mBank S.A. Nr 31 1140 1977 0000 5803 0100 1001 KRS: 0000264771,
District Court for the Capital City of Warsaw, XII Division of the National Court Register NIP: 527-243-20-41 REGON: 015716698 www.gaz-system.pl

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- Field No 11/b "Available Capacity": should be optional or provide possibility to publish "unknown". Please refer to the above mentioned field "Unavailable Capacity". In addition GAZ-SYSTEM S.A. prefers to use as measurement unit the "kWh/h" instead of "MWh/d".
 - Field No 12/b "Nominal Capacity": should be optional and renamed as "Technical Capacity". GAZ-SYSTEM S.A. considers the "Nominal Capacity" as the technical available capacity. In addition GAZ-SYSTEM S.A. prefers to use as measurement unit the "kWh/h" instead of "MWh/d".
 - Field No 16 "Event stop": should be optional or provide possibility to publish "unknown". In many cases a valid estimation for the end of an event cannot be given.

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

GAZ-SYSTEM S.A. agrees with the proposal and considers that it's not necessary to offer both solutions together. In addition GAZ-SYSTEM S.A. suggests that it should be the filed identifier with description for the RSS or ATOM in common schema for the disclosure of inside information.

