

8 December 2017



Dear Sir/Madam,

With this letter, Centrica would like to provide some brief comments to the Consultation Paper on the Revision of electronic formats for transaction data, fundamental data and inside information according to REMIT.

We welcome the consultation opened by ACER on the topic and the early engagement with the industry for a proposed implementation by the 31st March 2019. We reserve to provide further comments during the process either directly or through trade bodies.

Our main observation concerns the timing for implementation. 31st March 2019 coincides with a peculiar period of the year which requires IS and business resources to be dedicated to commercial activities: it is the end of the gas winter season and, in 2019, will also be the date for clock change. For pure practical reasons, we suggest either to delay or to anticipate the changes to mid-April or mid-March.

More detailed comments on the proposals:

- A.7.2: from the explanation of the change proposed it seems that ACER would like to require the field 'datetime' to be referred to a certain time zone. We would prefer maintain the requirement to refer to the UTC standard only. We believe that the requirement to refer to a specific time zone may create additional issues and loss of data quality, especially in those cases where transactions happen cross border between two different time zones.
- A.7.7: we understand ACER intention to introduce validation rules and we do not have specific comments on the data-field proposed as examples in the consultation paper. However, we recommend that any validation rules will be made transparent and clearly identified within the xml schema. This should allow market participants to pre-validate their reports, avoid rejections from ARIS and add further processes to re-validate the submissions.

Finally, we would like to note that Centrica is highly supportive of integrity and transparency in wholesale electricity and gas markets in Europe. As a trading arm of the Centrica group, Energy Marketing & Trading (EM&T) has an interest in the effectiveness of the framework established by REMIT across all European countries. In this sense, we appreciate any effort from ACER to foster harmonisation in the publication of UMMs and ensure that the standards that have been published by ACER are effectively followed.

We remain available for any further explanation that might be necessary.

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

Proposed change No. A.1.1 et al

[please provide the number of question to which you are providing feedback]

Respondent's view *

Our main observation concerns the timing for implementation. 31st March 2019 coincides with a peculiar period of the year which requires IS and business resources to be dedicated to commercial activities: it is the end of the gas winter season and, in 2019, will also be the date for clock change. For pure practical reasons, we suggest either to delay or to anticipate the changes to mid-April or mid-March.

Proposed change No. A.7.2

[please provide the number of question to which you are providing feedback]

Respondent's view *

From the explanation of the change proposed it seems that ACER would like to require the field 'datetime' to be referred to a certain time zone. We would prefer maintain the requirement to refer to the UTC standard only. We believe that the requirement to refer to a specific time zone may create additional issues and loss of data quality, especially in those cases where transactions happen cross border between two different time zones.

Proposed change No. A.7.7

[please provide the number of question to which you are providing feedback]

Respondent's view *

We understand ACER intention to introduce validation rules and we do not have specific comments on the data-field proposed as examples in the consultation paper. However, we recommend that any validation rules will be made transparent and clearly identified within the xml schema. This should allow market participants to pre-validate their reports, avoid rejections from ARIS and add further processes to re-validate the submissions

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**