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WINGAS GmbH (WINGAS) welcomes the opportunity to comment the discussion paper “Disclosure of inside information according to Article 4 (1) of Regulation (EU) No 1227/2011 through platforms”.

As outlined in the recital 19 of the REMIT the “Reporting obligation should be kept to a minimum and not create unnecessary costs or administrative burdens for market participants.” To comply with this objective, and to avoid any kind of double reporting we generally support the idea of reporting insider/transparency information through Regulated Information Services (RIS). . The transmission via one single reporting channel (platform) has the big advantage that the market participants are able to fulfill all requirements under the different regulations, i.e. REMIT, EMIR regarding disclosure of inside information. This implies that ACER as well as the NRAs will get all needed information from the platform and to analyze relevant details.

That is why option B seems rather to be qualified to comply with aforementioned issues.

In addition to the general obligation under Art 4 (1) REMIT the market participant is forced through Art 8 (5) REMIT to report the inside/transparency to NRAs and ACER. We regard this kind of double reporting as not reasonable due to the aforementioned described reporting mechanism over the platform.

Finally, Art 4 (2) REMIT defines information that market participants have to report but not to publish at the same time. This information could also easily be included in a separated area within the RIS area/platform that can only be accessed by NRA/ACER for their internal use.

Another key aspect for us is that, after having reported all relevant information to the platform, the market participant is no longer responsible for the reporting requirements.

Kind regards

Tobias Schnelle