

List of organised market places – Public Consultation Paper

Sorgenia comments



Milan, 11 December 2014

Sorgenia believes that the list of regulated markets should be as complete as possible in order to give the opportunity to the operators to delegate the reporting activities to organized market places according to art 6.1 of the Remit Implementing Acts.

- 1. Please provide us with your comments on the draft list of organised market places. Do you see any omissions or errors in the list? Do you think that any organized market place or any information on organised market places is missing, that should be published in order to facilitate transaction reporting under REMIT? Please comment especially the potential organised market place status of those entities marked with an asterisk that had not registered themselves as organised market places at the time when this public consultation was launched. Please justify your reply.*

We believe that the list should include also Idex, the Italian Derivatives Energy Exchange managed by Borsa Italiana, and the Energy Broker Platform OTCex.

In order to facilitate transaction reporting, It should be useful to publish the internet web site link to the “Remit area” where market participants can find contacts and information on the reporting agreement offered by the organized market.

- 2. Virtual trading points (VTPs) are currently not included in the draft list of organized market places, unless they provide brokering services or are considered as an energy exchange. Do you agree with this approach? If not, please justify your reply*

We agree with this approach.

- 3. For the reasons stated above (see point 1. in paragraph 4 of this consultation paper), the Agency currently believes that primary auction platforms for transportation contracts do not have to be listed as organised market places. Do you agree with this approach? Please justify your reply*

We agree with this approach. In our understanding the information on primary transport capacity allocation should be reported by ENTSO-E (or ENTSO-G) or by TSO's.

- 4. The final list of organized market places is supposed to include organized market place IDs for the purpose of facilitating transaction reporting under REMIT. Do you agree that the list of organized market places should make this information publicly available? If not, please justify your reply.*

We agree with this approach.

- 5. The list of organised market places is supposed to be updated in a timely manner. The Agency is currently intending to update the list on a regular basis as and when required, in particular as and when the Agency is given further information on gaps. Do you agree with this approach? If not, please justify your reply.*

We agree with this approach.