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Reply of the CEZ Group to the public consultation on publication of extracts of the European register of market participants

General

We welcome the opportunity to discuss the details of the publication of extracts of the European register for market participants. We recognize the ultimate importance of proper definition of several terms within the European register of market participants. Our answers to the relative questions are here below.

Questions & Answers

Annex – List of consultation issues

1) Information necessary for market participants to complete their registration obligations according to Article 9(1) of REMIT

1. Is the scope of data foreseen to be published sufficient for market participants to complete their registration, especially with regard to the information required in Section 4 of the registration format, and thus fulfill their obligation under Article 9(1) of REMIT?

No. We miss exact definition of following terms: beneficiary, ultimate controller, undertaking and controlling party. We at the same time miss the definition and the condition for classification of type of connection.

2. In order to identify or verify the identity of a related undertaking, is the publication of information in fields 108 to 110 (address, city, postal code) necessary and appropriate?

Yes. We recognize these fields to be necessary and appropriate.

3. Is the publication of other company's identifier such as VAT Number in field 112 or the codes in fields 113 to 116 (EIC, BIC, LEI, GS1) or 118 (trade register) necessary and appropriate (please take into consideration that they might not be available for all market participants)?

Not all. We think that mandatory shall be only one of codes (any of them). Main identifier shall be assigned ACER CODE.



4. Do you believe that the scope of data to be published from the European Register should be increased or decreased?

We think that the scope of data is sufficient and should be neither increased nor decreased.

2) Information to improve the transparency of wholesale energy markets

1. Is the scope of data foreseen to be published for transparency purpose appropriate?

Scope of data is appropriate.

2. Do you believe that the scope of data to be published from the European Register for transparency purpose should be increased or decreased?

We think that the scope of data is sufficient and should be neither increased nor decreased.