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4   ACER – Agency for the Cooperation of Energy Regulators
5
6   Public Consultation Paper (PC_2014_R_02)
7
8
9   OPINION RELATED TO THE TRADE REPORTING USER MANUAL (TRUM)
10
11   First of all, a lot of thanks to ACER (Agency for the Cooperation of Energy Regulators) for
12   organising this very interesting public consultation.
13
14
15   This opinion represents an opinion of an individual citizen, not any legal entity.
16
17   This opinion does not contain:
18   –   any business secrets
19   –   any trade secrets
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24
25   ACER can publish this opinion on a relevant web page.
26
27
28   Annex 2 holds information about disclaimers and copyright.
29
30
31
32   Best Regards,
33
34
35
36
37
38
39   signed electronically
40
41
42   [Continues on the next page]
43

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44
45 **1. General: Previous consultations**
46
47 I gave earlier opinions to ACER, and PDF files of those opinions are on the following addresses:
48
49   EN: Opinion 34: REMIT Registration Format
50   http://www.jukkarannila.fi/lausunnot.html#nro_34
51
52   EN: Opinion 43: Publication of extracts of the European register of market participants
53   http://www.jukkarannila.fi/lausunnot.html#nro_43
54
55 (REMIT: Pursuant to Article 9(3) of Regulation (EU) No 1227/2011 of the European Parliament
56 and of the Council of 25 October 2011 on wholesale energy market integrity and transparency)
57
58 SO, in this Opinion there should be some new insights related the publication of Trade Reporting
59 User Manual (TRUM).
60
61 **2. General notes of the ARIS / The Agency's REMIT Information System (ARIS)**
62
63 There are several mentions about the ARIS, but the implementation of ARIS is somewhat unclear in
64 this phase. I have to reiterate again (cf. previous opinions) the maximum solution for the ARIS:
65   * ACER owns the machinery and processor of the information system (e.g. ARIS)
66   * the machinery and processor are based on relevant open standards
67   * the operating system is based on an open-source solution
68   * ACER owns the source code of the information system
69   * ACER owns the database of the information system
70   * the database is based on open-source solution and on relevant open standards.
71
72 Naturally ACER can use technologies, which are developed in an open environment, but these open
73 technologies can be the base for actual solutions with direct ownership.
74
75   **ACER will most probably face a fierce resistance from several stakeholder**
76   **groups when/if ACER is demanding total ownership of the whole information**
77   **system, e.g. ARIS.**
78
79 Therefore the technological implementation of a (new) ARIS should be totally controlled by ACER,
80 and the providers of different technologies should not create any technological lock-ins for ACER.
81 The data in ACER systems should be totally controlled by ACER in all phases of the life cycle of
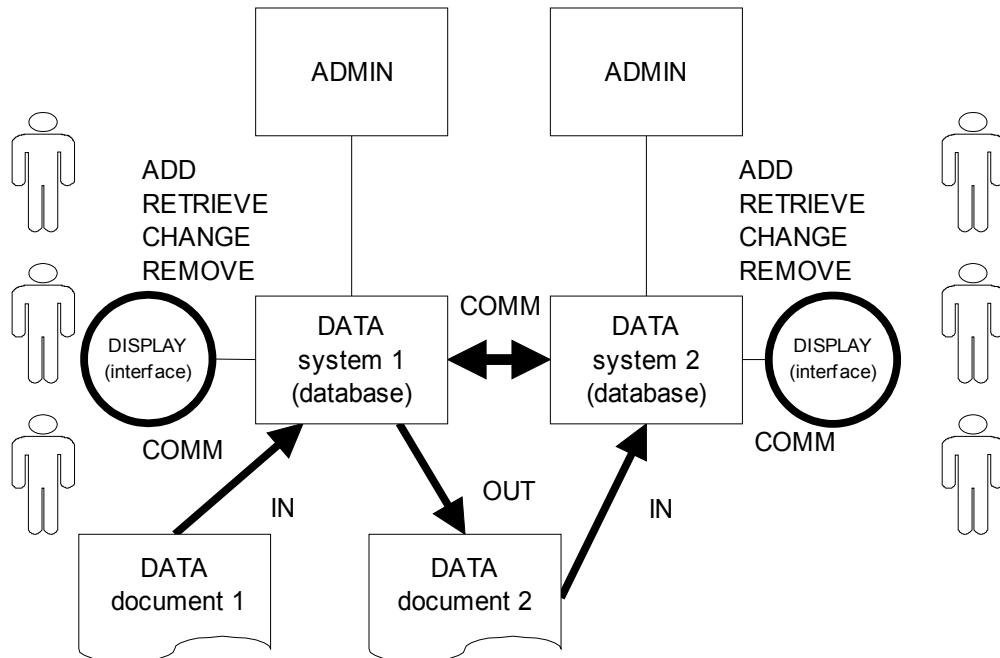82 the ACER systems.
83
84 **3. Simple conception of information systems**
85
86 The following figure gives us four basic functions: add, retrieve, change and remove. Then there are
87 databases and documents used in different systems. Users use different displays (interfaces).
88 Different systems need administration (e.g. maintenance) for keeping a system functional. Then

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89 there is communication (also standards) for direct and indirect usage of an information system.
90

91
92
4. Internal identifier / Field 0
93

95 There is some text about ACER code and other codes.
96 Field No 1 is following: "ID of the market participant or counterparty".

97

98 There could be fied No. 0, which could be following: "Internal ID for internal usage of the system."
99 The internal ID will help in situations, when there is need to change information in other fields. The
100 business of different communities can change; for example there can be mergers of different
101 communities and/or a community can be divided to two "new" parts.

102

103 With the internal ID (Field No. 0) it is easier to handle situations in the form of different companies.

104

105 **Proposal 1: There could be an internal identifier (Field No. 0) for the ARIS system.**

106

5. Need for very detailed technical consultation?
107

108

109 There is mentioning on the consultation document of following issues:
110 * ACER Requirements for Registered Reporting Mechanisms (RRM)
111 * ACER Technical Specifications for Registered Reporting Mechanisms (RRM)
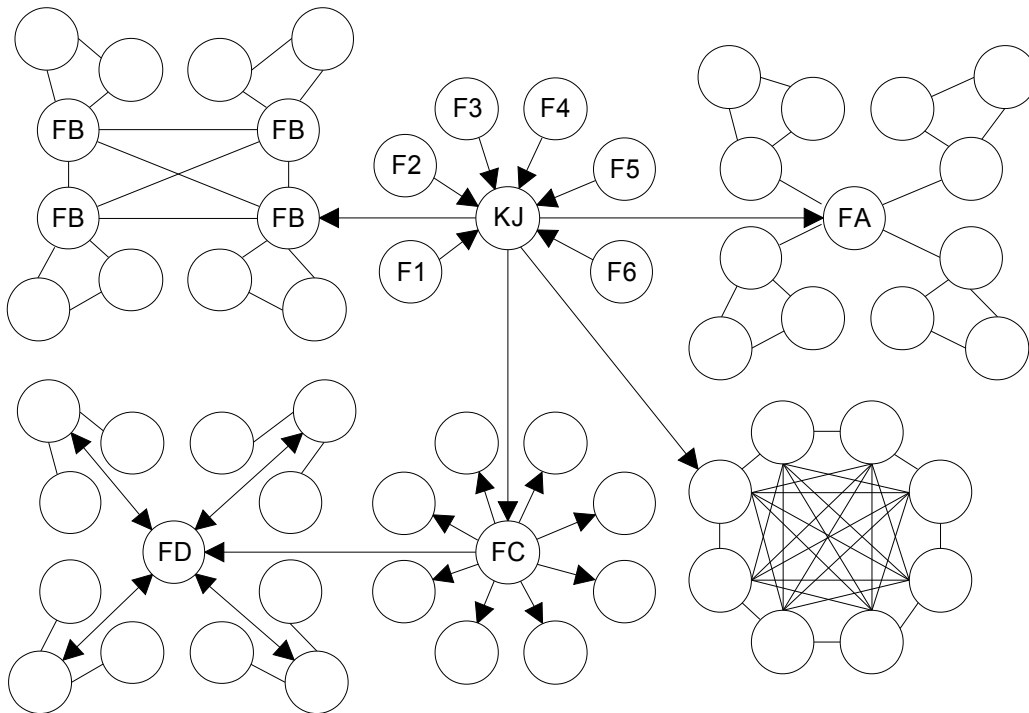
112

113 It can be concluded, that these two documents can be highly technical. However, there could be a
114 consultation based on these technical documents, and the main target audience could be chief
115 information officers in different stakeholder communities and/or specialist of information system

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116 providers in different communities. In some communities, consulting information system providers
117 (and subcontractors) of those communities may result need for highly detailed technical
118 specifications.
119
120   **Proposal 2: ACER could organise a technical consultation about ACER system(s)**
121   **based on very detailed technical issues.**
122
123 **6. The number of needed standards and different standard versions?**
124
125 ARIS has four tiers presented on the draft of "Trade Reporting User Manual (TRUM)". In each tier,
126 there are actually several other systems, which are connected to ARIS system. Therefore, the
127 number of needed standards can be considerable, and the high level design is just a starting point for
128 assessing needed standards and/or standardisation.
129

130
131
132 The previous figure is a conception if this situation: in reality there are several versions of different
133 standards (Formats). Different standard (Formats) versions is a serious issue, when there are
134 possibly tens of different systems cooperating with ACER systems.
135
136 Since different systems are layered, this means need for using several version of standards (formats)
137
138 **7. Web feed (or news feed) / An example of two standards**
139
140 One important feature to all modern systems is naturally providing different web feeds, check the
141 symbol below.

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142
143
144 Web feeds [1] can be used by several different systems, and the classification of systems can be based
145 on several needs:
146   * different user classes
147   * daily feeds
148   * weekly feeds
149   * monthly feeds.
150
151   **Proposal 3: ACER could create different web feeds (or news feed) based on the needs of**
152   **different stakeholders.**
153
154 ACER could provide different web feeds based on the current information needs after consulting
155 different stakeholders.
156
157 One example is naturally, that there is Atom [2] standard and RSS [3] standard for web feeds. Some
158 systems use Atom standard and some systems use RSS standard, and possibly ACER has to provide
159 both feeds.
160
161   **Proposal 4: ACER has to assess need for implementing RSS feeds in ACER systems.**
162   **Proposal 5: ACER has to assess need for implementing Atom feeds in ACER systems.**
163
164 **8. Other feeds / Possibly XML / An example of a standard / Another example: CSV**
165
166 Then there is the question of creating other feeds based on XML.
167
168   **Proposal 6: ACER could collect information about existing other XML feed formats,**
169   **i.e. not only RSS feeds.**
170   **Proposal 7: ACER has to critically assess developing new XML feed formats.**
171
172 One serious option is naturally transmitting CSV [4] documents (Comma-separated values), since
173 CSV usage (in and out) is implemented in several systems.
174
175   **Proposal 8: ACER could collect information about CSV usage and/or CSV**
176   **implementation in different stakeholder systems.**
177
178 **9. Checking standards developed by standard setting organisations (SDO)**
179
180 There are hundreds of different standard setting organisations (SDO), and one comprehensive list is

---

1   http://en.wikipedia.org/wiki/Web_feed, Web feed -Wikipedia article
2   http://tools.ietf.org/html/rfc4287, The Atom Syndication Format
3   http://www.rssboard.org/rss-specification, RSS 2.0 Specification
4   http://en.wikipedia.org/wiki/Comma-separated_values, comma-separated values (CSV) -Wikipedia article

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181   provided [5] for us by ConsortiumInfo.org.
182
183   **Proposal 9: ACER could systematically assess existing standard setting organisations**
184   **(SDO) and assess standards provided by those communities.**
185   **Proposal 10: The number of redundant standardisation efforts should be minimal.**
186
187   After serious assessment of standardisation landscape, the needed number of different standards is
188   actually known as a verified fact. Depending on the situation, ACER can make a feasible and
189   reasoned decision of standards, which could be used in ACER systems.
190
191   One option is participate in standardisation efforts, which can be donations to standardisation
192   communities and/or participating in standardisation efforts. Actually participating in standardisation
193   efforts means actually dedicating real work time and real workforce for standardisation.
194
195   **10. Field 1 / TRUM**
196
197   **Proposal 11: The length of this field could be e.g. 50 alphanumerical characters, since**
198   **some of the codes can be very long.**
199
200   **11. Field 23 / TRUM**
201
202   **Proposal 12: Should there be two fields:**
203   **1)   Identifier for organised market place?**
204   **2)   Actual identifier provided by market place?**
205
206   Since these identifiers are provided by external communities, the nature of those external
207   communities can change in time and space, e.g. mergers.
208
209   **12. Field 26 / TRUM**
210
211   The decision to use just one timestamp information (UTC time) is very good, since timezone
212   information can be calculated based one timestamp information (UTC time).
213
214   **13. Field 27 / TRUM**
215
216   The length of this field not defined.
217
218   **Proposal 13: Should this field definition be "Up to 52 alphanumerical digits"?**
219
220   One thing is, that there can be several versions of different contracts, even though contracts can be
221   with the same name.
222
223   **Proposal 14: Should there be a field for managing versions of different contracts?**
224

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5   http://www.consortiuminfo.org/links/linksall.php, Standard Setting Organizations and Standards List

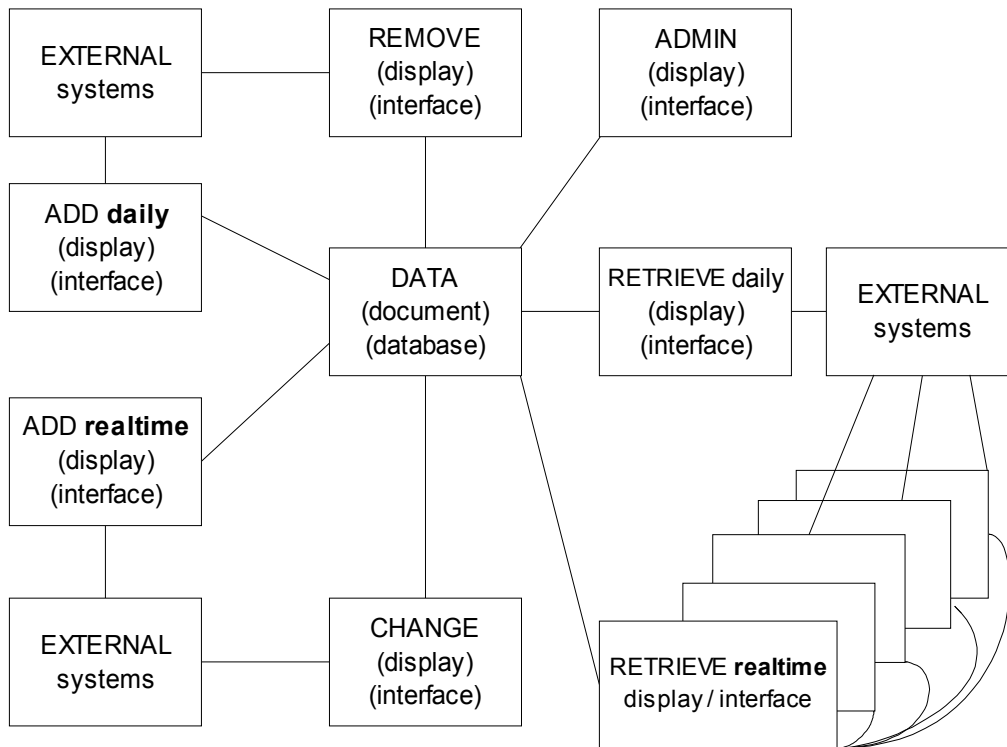225 **14. Fields 48 / TRUM**
226
227 Most probably the examples should be in the following formats:
228   2014-01-29
229   2014-02-28
230   2014-03-31
231
232 **15. Abbreviations / TRUM**
233
234   **Proposal 15: All abbreviations should be before actual text.**
235
236 **16. The need for replicated systems?**
237

238
239
240 There is not much mentioning about replicating some ACER systems. The figure above tries to give
241 an example of system replication. Since the retrieval is the mostly used function, possibly there can
242 be replicated systems for retrieval, e.g real-time search and archival search can be in different
243 systems. Also add function can be e.g. realtime or daily.
244
245   **Proposal 16: The need for replicated (ACER) systems has to be assessed seriously.**
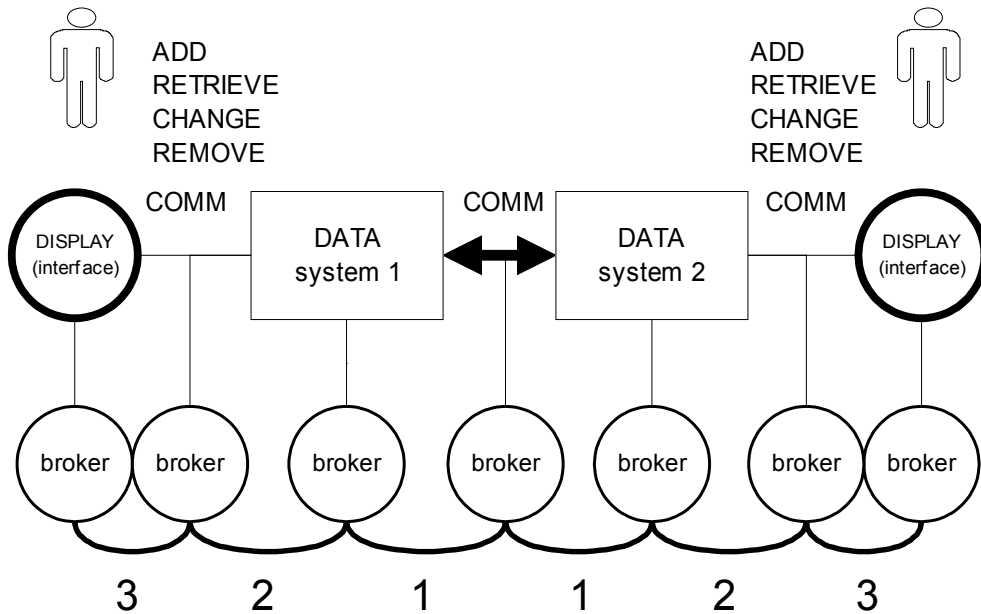246
247 **17. The need for brokered systems**
248
249 One aspect is different brokered systems, which are usually "Trusted third parties". E.g online

250 shopping systems need a broker for transmitting actual payments from customers to sellers.
251

252
253
254 Possibly ACER systems are actual brokers, and different systems then rely on ACER systems as
255 "Trusted third parties". Possibly ACER systems has to use "broker systems", which are needed for
256 over-all functioning of ACER systems with different stakeholder groups.
257
258   **Proposal 17: The number and nature of different broker systems has to be assessed**
259   **carefully.**
260
261 **18. Concluding remarks**
262
263 Developing new information systems are never easy, and ACER systems are not exceptions.
264 Therefore there are always different possibilities for having serious problems with with (new and
265 old) information systems.
266
267 Like said before, using different experts in different phases of ACER system(s) development can
268 result some success.
269
270 **19. Good luck!!!**
271
272 This opinion is quite limited. Hopefully there are constructive ideas presented in other opinions.
273 This remains to be seen.

274
275   **ANNEX 1**
276
277
278   My opinions to the previous and relevant consultations – there consultations were mostly organised
279   by the Commission of the Europan Union. General page to all consultations – both in English and
280   in Finnish: http://www.jukkarannila.fi/lausunnot.html
281
282
283   EN: Opinion 1: Review of the rules on access to documents
284   http://www.jukkarannila.fi/lausunnot.html#nro_1
285
286   EN: Opinion 2: Schools for the 21st Century
287   http://www.jukkarannila.fi/lausunnot.html#nro_2
288
289   EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for
290   Safe and Innovative medicines
291   http://www.jukkarannila.fi/lausunnot.html#nro_3
292
293   EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
294   http://www.jukkarannila.fi/lausunnot.html#nro_5
295
296   EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
297   http://www.jukkarannila.fi/lausunnot.html#nro_6
298
299   EN: Opinion 8: European Interoperability Framework, version 2, draft
300   http://www.jukkarannila.fi/lausunnot.html#nro_8
301
302   EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS
303   proposal for comments
304   http://www.jukkarannila.fi/lausunnot.html#nro_9
305
306   EN: Opinion 15: Collective Redress
307   http://www.jukkarannila.fi/lausunnot.html#nro_15
308
309   EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
310   http://www.jukkarannila.fi/lausunnot.html#nro_17
311
312   EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
313   http://www.jukkarannila.fi/lausunnot.html#nro_18
314
315   EN: Opinion 19: Official Acknowledgement by the Commission
316   http://www.jukkarannila.fi/lausunnot.html#nro_19
317
318

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319 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
320 http://www.jukkarannila.fi/lausunnot.html#nro_20
321
322 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
323 http://www.jukkarannila.fi/lausunnot.html#nro_21
324
325 EN: Opinion 23: Public consultation on the review of the European Standardisation System
326 http://www.jukkarannila.fi/lausunnot.html#nro_23
327
328 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
329 http://www.jukkarannila.fi/lausunnot.html#nro_27
330
331 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
332 http://www.jukkarannila.fi/lausunnot.html#nro_28
333
334 EN: Opinion 30: Internet Filtering
335 http://www.jukkarannila.fi/lausunnot.html#nro_30
336 NOTE: Organised by the European Committee for Standardization (CEN) [6]
337
338 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
339 http://www.jukkarannila.fi/lausunnot.html#nro_32
340
341 EN: Opinion 34: REMIT Registration Format
342 http://www.jukkarannila.fi/lausunnot.html#nro_34
343 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) [7]
344
345 EN: Opinion 35: Exploiting the employment potential of the personal and household services
346 http://www.jukkarannila.fi/lausunnot.html#nro_35
347
348 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
349 http://www.jukkarannila.fi/lausunnot.html#nro_37
350
351 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
352 http://www.jukkarannila.fi/lausunnot.html#nro_39
353
354 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
355 http://www.jukkarannila.fi/lausunnot.html#nro_40
356
357 EN: Opinion 41: AT.39398: observations on the proposed commitments
358 http://www.jukkarannila.fi/lausunnot.html#nro_41
359
360 EN: Opinion 42: Opening up Education
361 http://www.jukkarannila.fi/lausunnot.html#nro_42

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6   http://www.cen.eu/ (Accessed 2 July 2012)
7   http://www.acer.europa.eu/ (Accessed 2 July 2012)

362
363 EN: Opinion 43: Publication of extracts of the European register of market participants
364 http://www.jukkarannila.fi/lausunnot.html#nro_43
365 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)
366
367 EN: Opinion 44: Evaluation policy guidelines
368 http://www.jukkarannila.fi/lausunnot.html#nro_44
369
370 EN: Opinion 45: About ICT standardisation
371 http://www.jukkarannila.fi/lausunnot.html#nro_45
372
373 EN: Opinion 46: Review of the EU copyright rules
374 http://www.jukkarannila.fi/lausunnot.html#nro_46
375
376 EN: Opinion 51: European Area of Skills and Qualifications
377 http://www.jukkarannila.fi/lausunnot.html#nro_51
378
379 EN: Opinion 52: Trusted Cloud Europe Survey
380 http://www.jukkarannila.fi/lausunnot.html#nro_52
381
382
383
384 My opinions to the previous and relevant consultations – there consultations were mostly organised
385 by the Commission of the Europan Union. General page to all consultations – both in English and
386 in Finnish: http://www.jukkarannila.fi/lausunnot.html
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390 [Continues on the next page]
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393   **ANNEX 2**
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395
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433   The English explanation is on the following web page:
434   http://creativecommons.org/licenses/by-nc-nd/4.0/legalcode
435

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437

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8   Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011
     parliamentary elections in Finland challenge the three-party system, since three "old" parties were not traditionally
     as the three largest parties. The is now a "new" party as the third largest party. We all must remain being interested
     about this new development in Finland.

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