



Consultation on ACER's Manual of Procedures on Fundamental Data Reporting under REMIT

Enagás comments

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1. **Consultation Questions**

1. Please provide us with your general comments on the purpose and structure of the draft Manual, annexed to the consultation paper.

1. Enagás considers that the Manual in general terms is a useful tool in order to assist reporting entities to report fundamental data under Regulation 1227/2011.
2. Enagás is concerned that due to the delay in publication of the Commission's Implementing Acts, the Manual will not exactly reflect the content of such Implementing Acts.

2. Please provide us with your views on the attached data fields (see Annex I of the draft Manual) for the reporting of fundamental data.

3. The definition of relevant points included by ACER in the reporting schema goes beyond the definition of relevant points under point 3.2 of chapter 3, of Annex I of Regulation 715/2009. Quality Conversion facilities and notional points, are not a relevant point as defined in the Third Energy Package.
4. Enagás agrees with the proposed exclusion of bookable points in the provision of fundamental data reporting.
5. With regards to the "REMIT ENTSOG REPORTING SCHEMA USAGE GUIDELINES FOR DATA FIELDS" Enagás recommends the following changes:
 - ENTSOG should report on behalf of Transmission System Operators and not on "behalf of market participants".
 - The Manual should only refer to obligations included in the Commission's Implementing Acts and do not go beyond the legal requirements.
6. With regards to the "REMIT GAS NOMINATIONS REPORTING SCHEMA USAGE GUIDELINES FOR DATA FIELDS" Enagás recommends the following changes:
 - The Reporting Participant shall be identified by the Energy Identification Code (EIC).
 - Bookable Points: in relation to the definition of bookable points, Enagás prefers to use the definition included in Art. 9.2 of the IAs, i.e.: *'The information shall be provided for the following bookable points of the transmission system: all interconnection points, for entry points of production facilities including of upstream pipelines, for exit points connected to a single customer, for entry and exit points to and from storage, for LNG facilities and physical and virtual hubs.'*

- Enagás agrees that the reporting takes place in relevant Edig@s-format and would like to stress that “web services” should be one of the protocols permitted for these purposes.
 - The market participant whom the reported quantity concerns, shall be identified by a unique code, i.e. the Energy Identification Code (EIC)
 - Please note that the “The unit of measurement used”, i.e. kWh/d, 25°C, is currently being discussed in the Comitology Process of the Network Code on Interoperability and Data Exchange. Enagás would prefer to make the reference to the Interoperability Network Code instead of providing a specific reference temperature as this is subject to changing.
7. With regards to the “REMIT LNG REPORTING SCHEMA USAGE GUIDELINES FOR DATA FIELDS” Enagás recommends the following changes:
- Enagás suggests that the Reporting Participant is identified by an Energy Identification Code (EIC).
 - Enagás agrees with the use of the Energy Identification Code (EIC) for the “LNG facility”.
 - The aggregated values, shall be provided to the Agency via Gas LNG Europe’s (GLE) platform, i.e.: the Aggregated Gas LNG Inventory (AGSI).
 - For the purpose of identifying market manipulation, Enagás believes that the Unavailability report shall only be reported in the case the unavailability of the facility will have an impact on the market.
 - The term “adjustment value” should be changed by “conversion factor”.
8. With regards to the “REMIT STORAGE REPORTING SCHEMA USAGE GUIDELINES FOR DATA FIELDS” Enagás recommends the following changes:
- Enagás suggests that the Reporting Participant is identified by an Energy Identification Code (EIC).
 - Enagás agrees with the use of the Energy Identification Code (EIC) for the “Storage facility”.
 - The aggregated values, shall be provided to the Agency via Gas Storage Europe’s (GSE) platform, i.e.: the Aggregated Gas Storage Inventory (AGSI)
 - For the purpose of identifying market manipulation, Enagás believes that the Unavailability report shall only be reported in the case the unavailability of the facility will have an impact on the market.

- The term "adjustment value" should be changed by "conversion factor".

3. As regards the data fields for electricity and gas nominations (see Annex I of the draft Manual), please notice that a data field for Status is included for gas (data field No 14), but not for electricity. Please provide us with your views whether this data field is relevant also for electricity nominations, and if so, whether existing Industry format could be updated accordingly.

9. Not applicable.

4. Please provide us with your views your views on the attached electronic formats (see Annex II of the draft Manual) for the reporting of fundamental data.

10. Enagás welcomes that ACER has made use of well-known and regularly used electronic formats for data reporting in Gas Industry.

11. Enagás would like to stress the importance of using web services as a communication protocol for the purpose of reporting fundamental to ACER.

5. The attached electronic formats for the reporting of gas nominations do currently not reflect the data fields for Contract Reference/Type (data field No 13) and Status Code (data field No 14). Please provide us with your views as whether these data fields should be required and thus if the XML schemas should be aligned accordingly

12. At the moment in the Spanish gas system nominations are directly linked to a specific contract. However, this is going to disappear at Ips in the near future in order to resemble the practices of other European systems and facilitate harmonisation. Thus, Enagás believes that the Contract Reference/Type (data field No 13) should be deleted. The gas nominations should contain: the nominated quantity, the flow direction and the counterpart.

13. Furthermore, Enagás suggests restricting the Status Code (data field No 14) to "Provisional" and "Definitive". The XML file should be aligned accordingly.

6. In order to avoid unnecessary costs or administrative burdens on reporting entities, the Agency intends to rely as much as possible on existing industry standards and data formats for the collection of fundamental data under REMIT.

For the purpose of ensuring operational reliability, the Agency however reserves the right not to take over all future changes of such standards and data formats introduced by the industry. Any future changes of existing standards and data formats shall therefore be agreed between the Agency and relevant industry organisation, before applying for the purpose of REMIT reporting. Please provide us with your views on the above approach.

14. Enagás agrees with the standards and data formats that have been used by ACER for the purpose of reporting fundamental data.
15. ACER should cooperate with TSOs, LSO, SSOs and the organisations representing them, i.e. GSE, GLE and ENTSOG in order to test the connectivity to their platforms.
16. Enagás believes that XML are an extended and reliable practice within the industry and should therefore be permitted by ARIS platform.

7. In order to assess insider trading, the Agency would consider necessary to have the following timestamps reported in sufficient level of detail:

- Time of the event (the time of occurrence of e.g. an outage of a power plant);
- Time of reporting to the public (the time when e.g. a market participant reported the outage to a platform for publication, or, in case of a nomination, the time when market participant nominated to a TSO);
- Time of publication (in the case of inside information, the time when the inside information was first disclosed to the market;
- Time of reporting to the Agency

The Agency considers that some formats as now specified, may not currently support the above requirements clearly enough. The Agency is considering to add such timestamps as data fields where not yet present. Please provide us with your views on the impact of adding such data fields to the present formats.

17. Enagás believes that it is unnecessary to have the above mentioned timestamps reported in such a great level of detail.
18. Furthermore the inclusion of these timestamps in the XML should not be mandatory as not all timestamps are applicable for all fundamental data reported. For example, only the timestamp "time of reporting to the public" is the only applicable timestamp applicable to nominations.
19. Enagas would like to clarify that the timestamps to which ACER is referring to correspond to the date and time and not to Electronic timestamps. Otherwise, it would not be feasible to provide so many electronic timestamps.