

ENTSOG Response to ACER Consultation Paper on “Manual of Procedures on Fundamental Data Reporting”

Introduction

ACER issued on 24th June 2014 the Public Consultation Paper on the “Manual of Procedures on Fundamental Data Reporting” (Regulation (EU) No 1227/2011 of the European Parliament and of the Council of 25 October 2011 on wholesale energy market integrity and transparency – REMIT).

ENTSOG welcomes the opportunity to respond to ACER’s public consultation through the following answers.

ENTSOG Response

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

ENTSOG considers the manual useful for the reporting entities in order to receive information on the methodology to be used for the fundamental data reporting under Regulation (EU) No 1227/2011 (REMIT).

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.

Please refer to ENTSOG comments directly included into the document.

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.

ENTSOG retains reasonable the data fields No 14 and would want to restrict the choice only with “Provisional” and “Definitive”.

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

ENTSOG welcomes that ACER has made use of well-known and established electronic formats for data reporting in Gas Industry.

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.

ENTSOG prefers to delete the data field for Contract Reference/Type (data field No 13), because there is no direct link in the systems of the TSOs between one single defined contract and the nominated, renominated and allocated gas quantity of the shipper. Indeed the shipper has many contracts with the TSO. The TSO consider the whole amount of the shipper booked capacity for a given day to check, whether the Shipper’s nominations are backed by enough booked capacity irrespectively from the Reference/type of the contract. Then there is no link between the allocation and a defined shipper’s contract. Moreover all information regarding the shipper contracts would be provided to the Agency trough the files for primary and secondary allocation for gas data fields.

ENTSOG retains reasonable the data fields Status Code (data field No 14) and would want to restrict the choice only with “Provisional” and “Definitive”. Then the XML file should be aligned only for the fields No 14 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 organization, before applying for the purpose of REMIT reporting. Please provide us with your views on the above approach.

ENTSOG does well understand the given reasons but would like to ask ACER to consider a slightly different approach to ensure operational reliability: the xml schemas have much overhead and provide much more possibilities to report data. Most sections of the xml formats do not affect regulatory reporting and consequently changes of these sections would not interfere with regulatory reporting. ENTSOG therefore proposes, that only changes that affect the operational reliability of regulatory reporting should be agreed between the Agency and the relevant industry organization.

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.

ENTSOG retains reasonable the use of the time stamps above mentioned. Moreover the data fields should not be mandatory in the xml schema and the use cases for this timestamps should be clearly defined in order to avoid misunderstanding and overlapping. Not all timestamp are applicable at the same time. For example in case of nomination the TSOs should only indicate “time of reporting to the public” and not the “time of the event” or the “time of publication”.