



Consultation on ACER's Transaction Reporting User Manual

Enagás comments

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Name: [REDACTED]

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1. Consultation Questions

1. Please provide us with your views on the scope and the objectives of this document. In particular, please provide your opinion on whether the kind of information included and the structure of the TRUM are suitable to facilitate transaction reporting. If not, please explain which additional information the TRUM should cover and/or how it should be structured

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. Please provide us with your general comments on the purpose and structure of the draft TRUM. In particular, please provide your opinion on whether the information the Agency intends to include in the first edition of the TRUM is sufficient for the first phase of the transaction reporting (contracts executed at organised market places). If not, please explain which additional information should be covered.

2. Enagás believes the Manual to be a useful tool for the reporting entities and its structure appropriate. The first edition of the TRUM includes sufficient information for the first phase of the transaction reporting.

3. Please provide us with your views on the Agency's proposed approach as regards the list of standard contracts. In particular, please provide your views on whether:

- the list of standard contract types enables reporting parties to establish whether to use Table 1 or Table 2 of Annex I of the draft Implementing Acts when reporting information under REMIT; and
- the identifying reference data listed in ANNEX II to be collected by the Agency would be sufficient and suitable to establish the list of standard contracts.

Do you agree that the list of standard contracts in Annex II should also be considered sufficient to list the organised market places or would you prefer to have a separate list of organised market places? Please justify your views.

3. Enagas agrees that the Agency draws up a list of standard contracts and organised market places which are subject to reporting obligations under REMIT.
4. ENTSOG agrees with the Agency's approach to draw up and maintain a public list of standard contracts and organized market places and update that list on a regular basis.

5. Enagás appreciates the list of contracts that have been included in Annex II, however would like to see more information regarding the transportation contracts. When doing so, it is important that the Agency defines the reference temperature of the contracts, otherwise the information will not be comparable and there could be mismatches.
6. Enagás believes it would be useful to have a list of the organised market places which are subject to reporting obligation in order to have more clarity on the matter.

4. Please provide us with your views on the explanation of product, contract and transaction provided in this Chapter, in particular on whether the information is needed to facilitate transaction reporting.

7. Enagás considers the information included in the chapter necessary to facilitate transaction reporting. It would be useful if the Agency fosters the utilisation of Energy Identification Codes (EICs) and encourage all parties concerned including market participants to request such codes for the purpose of facilitating reporting.

5. Please provide us with your views on the field guidelines for the reporting of transactions in standard supply contracts.

8. Not applicable.

6. Please provide us with your views on the examples of transaction reporting listed in ANNEX III of the draft TRUM. Do you consider the listed examples useful to facilitate transaction reporting?

9. Not applicable.

7. In your view, are there any additional examples to be added in ANNEX III of the draft TRUM? Please provide a description of example(s) that in your opinion should be covered.

10. Not applicable.

8. Please provide us with your views on the field guidelines for the reporting of transactions in non-standard supply contracts.

11. Not applicable.

9. Please provide us with your views on whether examples of transaction reporting should be added as regards transactions in non-standard supply contracts. If yes, please explain which scenarios these examples should cover.

12. Not applicable.

10. Please provide us with your views on the field guidelines for the reporting of transactions in electricity transportation contracts.

13. Not applicable.

11. Please provide us with your views on whether examples of transaction reporting should be added as regards transactions in electricity transportation contracts. If yes, please explain which scenarios these examples should cover.

14. Not applicable.

12. Please provide us with your views on the field guidelines for the reporting of transactions in gas transportation contracts.

15. Enagás supports the proposal delivered by ENTSOG and believes that the Agency should encourage third parties to request EIC codes for identification purposes in order to facilitate reporting.

16. All fields expressed in energy units: Enagás would like to stress that it is important that the units and temperature of reference are defined in advance in order for the data collected by the Agency to be comparable. The units and reference temperature should be aligned with the Transparency Guidelines (Chapter 3, Annex I of Regulation 715/2009) and the future gas Network Code on Interoperability and Data Exchange.

17. Field 13: this example is not going to be used even currently defined in Edig@s. Conditional capacity should be deleted. Firm and interruptible capacity already cover all options of possible types of capacity and furthermore Regulation 715/2009 does not include "conditional capacity". If there is any Member State which has conditional capacity at national level it should be included as interruptible capacity.

18. Fields 28, 37 and 38: Market participants should be encouraged to request EICs for identification purposes. These are the codes which are currently widely used in the gas industry.

13. Please provide us with your views on whether examples of transaction reporting should be added as regards transactions in gas transportation contracts. If yes, please explain which scenarios these examples should cover.

19. Enagás agrees with the proposal made by ENTSOG and suggests that the following examples of transaction reporting are covered:

20. Primary Market: Organized Market Place (Capacity Auction)

21. Primary Market: Not Organized Market Place (Capacity Other mechanism)

22. Secondary Market: Organized Market Place

23. Secondary Market: Outside Organized Market Place

14. Do you agree that, if organised market places, trade matching or reporting systems agree to report trade data in derivatives contracts directly to the Agency they must do so in accordance with Table 1 of Annex I of the draft Implementing Acts as regards contracts referred to in Article 3(1)(a)(9) and Table 3 or 4 as regards contracts referred to in Article 3(1)(b)(3)?

24. Not applicable.

15. In your view, are Tables 1, 3 and 4 of Annex I of the draft Implementing Acts suited for the reporting of contracts referred to in Article 3(1)(a)(9) and Article 3(1)(b)(3) respectively?

25. Not applicable.