

We welcome the invitation of ACER to comment this consultation paper about organized market places.

1. Please provide us with your comments on the draft list of organised market places. Do you see any omissions or errors in the list? Do you think that any organised market place or any information on organised market places is missing, that should be published in order to facilitate transaction reporting under REMIT? Please comment especially the potential organised market place status of those entities marked with an asterisk that had not registered themselves as organised market places at the time when this public consultation was launched. Please justify your reply.

Regarding the Organised Market Places (OMP) where we negotiate (brokers, exchanges or other OMP), either in Spain and Portugal, or in the rest of Europe, we consider the list of Annex I is quite exhaustive, although we have the following comments:

- We consider important to include the platforms for secondary electricity capacity trading, such as CASC (which are the same platforms for primary auctions).
 - We consider all the Energy Broker Platforms we use are included but we would like to clarify that the Iberian Gas Hub would be nowadays better classified as Other Organized Market Place, since it is not properly a broker platform but “any other system or facility in which multiple third-party buying and selling interests in wholesale energy products are able to interact in a way that results in a contract” (Art. 2.4.b).
2. Virtual trading points (VTPs) are currently not included in the draft list of organised market places, unless they provide brokering services or are considered as an energy exchange. Do you agree with this approach? If not, please justify your reply.

We agree with the criterion of not including VTP as platforms unless they provide other services for trading (exchange or broker).

3. For the reasons stated above (see point 1. in paragraph 4 of this consultation paper), the Agency currently believes that primary auction platforms for transportation contracts do not have to be listed as organised market places. Do you agree with this approach? Please justify your reply.

See answer 1.

4. The final list of organised market places is supposed to include organised market place IDs for the purpose of facilitating transaction reporting under REMIT. Do you agree that the list of organised market places should make this information publicly available? If not, please justify your reply.

In order to facilitate reporting to all the stakeholders OMP should facilitate its ID.

5. The list of organised market places is supposed to be updated in a timely manner. The Agency is currently intending to update the list on a regular basis as and when required, in particular as and when the Agency is given further information on gaps. Do you agree with this approach? If not, please justify your reply.

We agree with the criterion of updating the Annex I list on a regular basis (e.g. once per quarter) as well as when required.