From:

Sent: 10 December 2014 09:50

To: REMIT Public Consultations

Cc:

Subject: Repower Group answers to PC_2014_R_07

Dear ACER,

here you can find the answers of Repower Group (Repower AG, Repower Italia s.pa., Repower Trading Ceská republika s.r.o., Repower Furnizare România S.R.L.) to the Consultation Questions of the ACER consultation paper "PC_2014_R_07"

- 1. we don't see any omission, we don't see a logic in excluding some broker platform like::
 - o Corretaje e Información Monetaria y de Divisas S.A., CIMD*
 - o GFI Group Inc*
 - o Marex Spectron Group Ltd*

As far as we know they provide brokerage services through organized "multilateral system" or "other 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". They provide services fully comparable to the ones provided by other broker platform reported in the Annex (ICAP Energy Limited, Tradition Financial Services Ltd, Tullett Prebon Plc)

- 2. we agree to exclude VTPs in the draft list. Their exclusion can be justified by the fact that energy ownership is transferred in the VTPs but not other information are available (in particular prices) which are fundamental to understand if the market integrity is threatened.
- 3. we would prefer to see also TSOs in the Annex list, since in any case TSOs should provide information related to primary explicit capacity allocation. Excluding them from the list seems to create an asymmetry between entities listed in the Annex and other entities that will provide information to be gathered. In any case, we will we fine if they will be excluded
- 4. we agree
- 5. we agree with this approach. Energy markets are dynamic and it is correct to define mechanism to update information about markets when changes happen.

I am at disposal in case of questions,

Best regards



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