26 June 2015
Ref. 15GIE072

GIE answer to ACER public consultation on disclosure of inside information

1 Who we are

Gas Infrastructure Europe (GIE) is an association representing the interests of European natural gas infrastructure operators active in natural gas transmission, storage and LNG regasification. GIE is a trusted partner of European institutions, regulatory bodies and industry stakeholders. It is based in Brussels, the heart of European policymaking. GIE currently represents 68 member companies from 25 countries.

2 GIE answer

GIE would like to highlight that only fields relating to fundamental data reporting according to the Implementing Regulation 1348/2014 are relevant for LNG System Operators and Storage System Operators. Nevertheless, GIE also provides answers to other fields.

For clarification, GIE would like to highlight, that in particular LNG System Operators are not market participants. Therefore, they are not obliged to publish the information regarding inside information mentioned in this public consultation. The Implementing Regulation 1348/2014 already foresees that LNG System Operators need to report planned and unplanned unavailability of the LNG facilities to ACER. This reporting has been already agreed with ACER in the XML schema.

N	UMM RELATED to CAPACITY CHANGE - GAS
1	Message ID
2	Update ID
3	Event Status
4/b	Message type
5	Type of event
6/b	Affected Asset
7/b	Affected Point EIC code
9/b	Balancing zone
10/b	Unavailable Capacity
11/b	Available Capacity
12/b	Nominal Capacity
13	Published
14	Decision time
15	Event start
16	Event Stop
17	Remarks
18	ACER registration code or unique market participant code
19	Market Participant
20	Impact on emission allowance prices

N	UMM RELATED to 'OTHER' TYPE of INSIDE INFORMATION - GAS and ELECTRICITY
1	Message ID
2	Update ID
3	Event Status
13	Published
14	Decision time
15	Event start
16	Event Stop
17	Remarks
18	ACER registration code or unique market participant code
19	Market Participant
20	Impact on emission allowance prices

2.1 Would you add any other field not included in the current proposal? If so, please explain your reasoning.

From the SSO point of view every possible unavailability event could be described. The description of "Type of event" is quite general, hence it is satisfying. In order to ensure that every possible event is covered, "others" also could be included in the definition. Would you remove any field represented in the current proposal? If so, please explain your reasoning.

Field № 14 "*Decision time*": it is not always possible and simple to define the exact decision time for unavailability, especially in case of unplanned outages. We also consider that the exact decision time would not bring important value to the market taking into account that the start date and time of the event will be published as well with the same UMM.

Field № 20 "*Impact on emission allowance prices*": it would be difficult for the personnel responsible for UMMs publishing to define how a certain storage unavailability in a storage or LNG terminal could influence the emission allowance prices.

SSOs/LSOs are obliged to report information relevant to the capacity and use of facilities for storage and LNG terminals under article 9 of Implementing Regulation 1348/2014. The nominal capacity would therefore already be reported, thus we suggest to change 11b) into "optional" applicability or remove it.

2.2 Would you change any of the descriptions, accepted values or applicability? If so, please explain your reasoning. Are the schemas or values that you are suggesting based on any industry standard? Which one(s)?

Alignment of Storage and LNG schemas for fundamental data reporting with the UMMs related to capacity changes in gas (including transmission) and 'other' type of inside information requested

The combination of **(1) Message ID, (2) Update ID, (3) Event Status (original – update – closed – cancelled – withdrawn), (15) Event Start (ISO8601 UTC format) and (16) Event stop (ISO8601 UTC format**) in the UMMs related to capacity changes in gas (including transmission) and 'other' type of inside information are better structured and more workable compared to the latest version of the **Start / End / Endflag** data fields in the Storage and LNG schemas for fundamental data reporting. This new structure would allow users of this type of information to better navigate and filter relevant messages.

Instead of the **unavailability Endflag (Confirmed or Estimated)** in the Storage and LNG schemas, a combination of the three data fields as proposed now is better and makes the information more useable. Users will be able to trace back an event and link it to its original report, and any updates regarding end time that followed). Additionally, users will not have to indicate that the end date is an estimation.

Therefore, GIE proposes to align the Storage and LNG schemas for fundamental data reporting with the UMMs related to capacity changes in gas (including transmission) and 'other' type of inside information, i.e. to replace Start / End / Endflag data fields with the Message ID / Update ID / Event Status / Event Start / Event Stop combination.

All the changes proposed below refer to the tables on page 10 of the ACER Consultation document:

Field № 2 "*Update ID*": referring to line 4 of pag.10 of the ACER document. It's not relevant as it is not possible that an unplanned outage becomes a planned outage.

Field № 4b "*Message Type*": In the Accepted Values the data field for LNG capacity unavailability from the LNG fundamental data reporting is missing. The unavailability in an LNG terminal is not related to unavailable storage. The field should also contain the choice "*Other*" because it is not possible to standardize ex ante any possible event affecting wholesale energy price. It is not completely clear how withdrawal and injection unavailability relate to storage unavailability. Are withdrawal and injection unavailability specifications of the more general storage unavailability? The Field No 17 "*Remarks*" will be used for the explanation of the event**Field № (6b) *"Affected Asset"* and Field № (7b) "*Affected Point EIC Code"***

> The data fields are more extensive than the current data fields in the Storage and LNG schema for fundamental data reporting. The Storage and LNG schemas ask for a Facility Identifier through their EIC code. These UMMs request the official name of the affected asset (mandatory). This may make the UMMs more readable, but simply using the EIC code avoids any doubts and redundancy.

Field № 5 *"Type of event"*: The difference between Planned unavailability and Unplanned Unavailability is not always clear. It would be helpful if more guidance is provided on when maintenance should be labelled as planned or unplanned (e.g. maintenance is planned if it is decided on more than [x] months in advance).

Field №7b "Affected point EIC": to be renamed to "EIC of the affected facility".

Field № 10b "*Unavailable Capacity":* It should be optional. In many cases the exact value or even an estimate can't be given in case of an unplanned event. Furthermore outages of platforms or IT failures in TSOs' backend systems can't be expressed in a concrete number of "Unavailable Capacity".

> The capacity units of measurement are different compared to the Storage and LNG schemas for fundamental data reporting:
>
> - It is indicated that Storage Capacity unavailability is measured in MWh > Storage schema includes TWh
> - It is indicated that (LNG) Capacity unavailability is measured in MWh/d > LNG schema uses GWh/day
>
> GIE proposes to use the agreed units from the Storage and LNG schemas for fundamental data reporting: TWh with 9 decimal places, GWh with 6 decimal places (to be modified in the LNG schema accordingly).
>
> Regarding Field № 10b) we would like to know if the accepted value "number" also accepts percentages. Some further descriptions would be helpful, for example, regarding the unavailabilities that need to reported, that is, all physical unavailabilities of the facilities or those subject to possible impacts on prices (impacts on contractual arrangements).

Field № (11b) "*Available Capacity*": It should be optional. In many cases the exact value or even an estimate can't be given in case of an unplanned event. Furthermore outages of platforms or IT failures in SS0s and LSOs' backend systems can't be expressed in a concrete number of "Unavailable Capacity". Furthermore SSOs and LSOs are already reporting the information relevant to the capacity and use of facilities for storage and LNG.

Field № (12b)"*Nominal capacity*": should be optional and renamed as "Technical Capacity".

Field №16 "*Event stop*": to be optional because it is not always possible and simple to define the exact end of an event of unavailability especially when it is unplanned outage.

Field № 17 "*Remarks*": the field should be renamed as "UMM description"

2.3 Do you agree with the use of RSS or ATOM feeds to fulfil the requirement under Article 10(1) of the REMIT Implementing Regulation?

GIE considers the proposed types of web feeds as best practice.