

**Consultation: REMIT
Common Schema for the Disclosure of Inside Information
Public Consultation Paper**

Reference: PC_2015_R_03

To: REMIT Public Consultations

The International Association of Oil and Gas Producers (IOGP) welcomes the opportunity to help ACER improve consistency in the publication of Inside Information. We are supportive of a common format for reporting. Indeed we would encourage further improved efficiency through promoting the reporting on centralized platforms such as those managed by individual TSOs or alike/ENTSOG.

To this end we would emphasize the necessity/importance of capturing the feedback of the current and prospective providers of such platforms both via the consultation and through involving them in roundtable discussions.

Per REMIT (recitals 2/11), we understand the primary purpose of Inside Information publication is to improve transparency of the wholesale energy market by collecting efficiently Urgent Market Messages (UMMs) and providing information “on capacity of use of facilities for production, storage consumption or transmission of electricity or natural gas or related to the capacity and use of LNG facilities” (REMIT art 2b).

We are concerned that some of the fields or Accepted Values outlined in the consultation document are not in alignment with these requirements and that they do not add any relevant information to the market (e.g. field 14/ Decision Time, Field 4b/Message Type).

Please find below IOGP responses in regards to the gas capacity/other fields.

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

Adding the name of the balancing zone could be considered. See Question 3.

- 2. Would you remove any field represented in the current proposal? If so, please explain your reasoning.**

Yes, as mentioned above, we do not think Field 14 is relevant to Inside Information publication.

- 3. 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)?**

Field 3/Event status: We assume “Cancelled” would only apply to planned events. It should be explained in the guidance.

Field 4b/ Message Type (gas capacity): The Accepted Value “Import contract curtailment” should be removed. As stated above, a contract curtailment is not an event affecting gas capacity/use of facilities and therefore is not relevant and may require participants to disclose

commercially confidential contractual information. Curtailment of imported supply driven by issues on import facilities will be captured via some of the events already listed (offshore pipeline unavailability, transmission system unavailability).

The field is missing accepted values to reflect addition of new capacity or start-up of new capacity as well as capacity issues that occur for non-technical events, e.g, LNG cargoes unloading issues in case of bad weather for example (eg unloading capacity unavailability).

Field 6b /affected asset: Accepted values should allow for multiple assets. In case of events affecting upstream assets, the guidance should note that the affected assets will be all the potential entry points to / sub terminals into / market areas of the wholesale energy market impacted by the upstream event. Information at field level is not relevant for MPs supply/demand planning purposes but the flow impacts at the entry/delivery points (field 9) are.

Field 9b/ Balancing zone: When several delivery points are available (e.g. gas from Norway, storage connected to a number of market areas), disclosing the delivery points chosen is commercially sensitive information so this field should allow multiple choices. Whilst we support the use of industry standard codes for identifying the balancing location, we would caution that just specifying (and not requiring commonly recognized names e.g. Teesside) will lengthen the time the market requires to respond to the Inside Information as the market will need to cross reference the notice with reference tables.

Field 10b/unavailable capacity: The reference to a 6:6 gas day is not applicable in all countries. The guidance should be encompassing all type of gas days. The end of the description is missing.

Field 10-12b (unavailable/available/nominal capacity): Guidance should be given for new capacity coming on line. We are questioning the relevance of 11 b under the assumption “field 11 =field 12-field 10”.

Field 16 (Event stop)/Event stop: The accepted value should allow MPs to choose as Accepted Value a “date and Time” or free text to reflect the date and time are “unknown at this time”

Field 18/ACER code: To encourage publication via centralized platform and make it a viable option, the guidance should make clear that, in this case only, the supplier of the information will be identified instead of the parties affected by the information. The accepted values should allow multiple choices. The guidance should also cover the case where the third party publishing on behalf of MPs is not an MP.

Field 19/Market Participant: see field 18

Field 20/Impact on carbon permit prices: It should be clarified that this field is not a REMIT requirement but a MAR requirement. Reference to the official MAR/MAD text to support the answer to this field should be mentioned in the guidance.

OGP welcome ACER’s steps towards harmonization of REMIT/MAR reporting but a clear message should be given to the MPs that disclosure through REMIT platforms will be acceptable for MAR reporting purposes.

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

Yes