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| Kontakt | DW | Unser Zeichen | Ihr Zeichen | Datum |
|  | 211 | AG – 18/2015 | | 22.06.2015 |

**Public Consultation: Common Schema for the Disclosure of Inside Information
 Comments by Oesterreichs Energie (Register ID number: 80966174852-38)**

Dear Madam,
 Dear Sir,

Oesterreichs Energie, the Association of Austrian Electricity Companies, welcomes the opportunity to comment on the public consultation: Common Schema for the Disclosure of Inside Information (PC_2015_R_03). Oesterreichs Energie represents more than 140 energy companies active in generation, trading, transmission, distribution and sales which in total cover more than 90 per cent of the Austrian electricity generation and the entire distribution.

We appreciate the purpose of this consultation paper to further increase the transparency of wholesale energy markets and to harmonize the current practice of disclosure of inside information under Article 4(1) of REMIT.

1. Would you add any other field not included in the current proposal?

The list of fields suggested by the agency is more than sufficient to provide fair and transparent information on events that would be likely to significantly affect wholesale energy prices.

2. Would you remove any field represented in the current proposal?

Field 2 'Update ID': Basically it is not necessary to implement an 'Update ID' because the date and time when the message was made available to the public is more than sufficient for market participants to follow the possible updates on an event.

Field 7 'Affected Asset EIC Code': Publishing the EIC Code of the affected asset will overload the relevant message and will not help market participants to quickly and easily identify the affected asset at first sight.

Field 11 'Available Capacity': Publishing the available capacity is not covered by Article 4(1) of REMIT and may also be derived from the nominal capacity and unavailable capacity.

Field 14 'Decision time': The date and time when the decision/information that leads to an event is made/ received might be difficult to establish due different processes / ways of working in each company. Moreover field 13 'Published' is sufficient for the disclosure of inside information. Otherwise the agency should outline why it would be helpful for market participants to know the 'Decision Time' that may lead to an event significantly effecting wholesale energy prices.

Field 18 'ACER registration code or unique market participant code': Publishing the ACER Code or unique market participant code of the affected asset will overload the relevant message and will not help market participants to quickly and easily identify the affected asset at first sight. Publishing the name of the market participant is much more helpful and completely sufficient.

Field 20 'Impact on emission allowance prices': Apart from the fact that the field 'Impact on emission allowances prices' is optional, it is difficult to determine if a specific event has an impact on these prices or not. The agency has to publish guidelines how to decide on such an impact.

3. Would you change any of the descriptions, accepted values or applicability?

Field 1 'Message ID': ACER has to specify/recommend how to generate a unique 'Message ID' in order to ensure a consistent publishing process.

Field 3 'Event Status': To many values in the field 'Event Status' would contradict the purpose of helping market participants to filter relevant messages with more ease. It makes more sense to focus on two events only (e.g. 'active' =original/update and 'inactive' = closed/cancelled/withdrawn) because all other relevant information can be derived from other fields.

Field 4 'Message Type': A separation of transmission unavailability and offshore grid infrastructure unavailability is not necessary at all.

Field 8 'Fuel Type (electricity capacity)': We appreciate that the list of accepted values reflects the practice of ENTSO-E as described in the Manual if Procedures for the ENTSO-E Central Information Transparency Platform Version 2.0. Therefore 'Fossil Brown coal/ Lignite' and 'Biomass' should be included.

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

We agree with the use of the RSS feeds, as it is the more common format, to fulfill the requirements under Article 10(1) of the REMIT Implementing Regulation.

Thank you for taking our comments into consideration. If you have any further questions, please do not hesitate to contact us.

Yours sincerely,

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