



TO: Agency for the Cooperation of Energy Regulators
DATE: 30 June 2015
SUBJECT: Comments to the Public Consultation on Common Schema for the Disclosure of Inside Information

PRISMA European Capacity Platform GmbH (PRISMA) welcomes the willingness of the Agency for the Cooperation of Energy Regulators (Agency) to consult the stakeholders on possible solutions to improve the way the information on Urgent Market Messages is disclosed to market participants.

Today the publication of Urgent Market Messages (UMMs) related to critical situations¹ of PRISMA platform is performed by the Transmission System Operators (TSOs) auctioning transmission capacity via PRISMA platform. But PRISMA's shareholders already agreed that the most efficient and customer oriented solution to inform market participants about critical situations of the PRISMA platform is directly via PRISMA platform. For this reason PRISMA is working on a technical solution to publish UMMs and to fulfil the requirements of the COMMISSION IMPLEMENTING REGULATION (EU) No 1348/2014. Said solution should be implemented in Q3/2015.

Regarding Box 1:

As a general remark PRISMA considers that the use of only one message for the gas industry ("UMM related to capacity change – gas") is more efficient from a data exchange and IT perspective. Then PRISMA would like to propose to change all fields not mentioned in the list of fields for "UMM related to other type of inside information" in the list of fields "UMM related to capacity change – gas" to "optional".

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

In addition to the proposed fields PRISMA needs to provide other data when informing the stakeholders:

- description of the failure,
- in case only specific market area(s) or TSO(s) are affected by the critical situation the indication of the market area(s) or TSO(s),
- in case only specific auctions are affected the indication of the auctions,
- the products affected by the problem (Yearly, Quarterly, Monthly, Daily and/or Within Day),
- the processes affected by the problem (e.g. Long term auctions, short term auctions, FCFS, Surrender)

We consider these data as necessary to provide correct information to the stakeholders. Including all of them in field No 17 "*Remarks*" could reduce the comprehensibility of the UMM. For this reason we suggest to the Agency to add at least one new specific field with "*Description/reason of the unavailability*".

¹ PRISMA's TSOs consider critical situations of PRISMA platform, such as impossibility to run auctions or website not accessible, as inside information according to the definition of REMIT.

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

Field No 14 “Decision time”: should be deleted. The field doesn't provide additional or meaningful information for the market. Moreover in case of unplanned events, IT failures or outages there is no decision consequently and the decision time can't be mentioned. The need to determine the decision time exactly creates a lot of administrative burden and bureaucracy.

Field No 20 “Impact on emission allowance prices”: should be deleted. From PRISMA's point of view the evaluation would be difficult and could create misleading sign to the market. Then to avoid misleading information the field shouldn't be used in general.

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)?

Unless explicitly mentioned below, we consider the Agency's proposal regarding descriptions, accepted values or applicability as appropriate.

Field No 2 “Update ID”: referring to line 4 of page 10 of the ACER document, we would like to comment that the example is not appropriate for the natural gas market because it's not possible that an unplanned outage become a planned outage. Indeed there is a clear rule in the Chapter 3, Annex I of Reg.715/2009 [Art. 3.3.1 (g)]: everything that is known 42 days in advance has to be considered as planned and every measure known shorter than 42 days in advance has to be considered as unplanned;

Field No 4/b “Message type”: should contain also the choice “Other” because it is not possible to standardize ex ante any possible event affecting wholesale energy price. The proposed field “Description/reason of the unavailability” shall be used for the explanation of the event.

In addition there are further events, not mentioned in the list of accepted values, like:

- technical problems in IT-systems of booking capacity platforms;
- technical problems in IT-systems of TSOs;

Field No 10/b “Unavailable Capacity”: should be optional. Outages of platforms or IT failures in TSOs' backend systems can't be expressed in a concrete number of “Unavailable Capacity”. In addition PRISMA would prefer to use as measurement unit the “kWh/d” or “kWh/h” instead of “MWh/d” as stated in Art.10 of CAM NC;

Field No 11/b “Available Capacity”: should be optional. Please refer to the above mentioned field “Unavailable Capacity”. In addition PRISMA prefers to use as measurement unit the “kWh/d” or “kWh/h” instead of “MWh/d” as stated in Art.10 of CAM NC;

Field No 12/b “Nominal Capacity”: should be optional and renamed as “Technical Capacity”. In addition PRISMA prefers to use as measurement unit the “kWh/d” or “kWh/h” instead of “MWh/d” as stated in Art.10 of CAM NC;

Field No 15 “Event Start”: In case of critical situations of PRISMA platform the “Event start” will always be before the publication of the UMM (13. Published)

Field No 16 “*Event stop*”: should be optional or provide the possibility to publish “*unknown*”. In case of critical situations of PRISMA platform, especially when the stakeholders are informed for the first time, it is extremely difficult to already have an indication when the problem will be solved. At the beginning of a critical situation our team is focused on identifying the reasons causing the problem. This activity can be extremely complicated and time consuming. Only after having identified the reason of the problem it is possible to have an initial and rough estimation on when it can be solved. Therefore we are proposing to the Agency to consider this field as optional or provide the possibility to publish “*unknown*”.

Stakeholders can be informed about the exact date, when the problem will be solved, with an update of the UMM. In many cases a valid estimation for the end of an event cannot be given;

Field No 19 “*Market participant*”: From the description of the commentary it is clear that both the market participants as well as the service providers are entities who disclose inside information. So the headline and the field identifier may be misleading, because they only refer to the market participant. PRISMA therefore proposes to rename the headline and field identifier to “Disclosing entity”.

Regarding Box 2:

The technical solution PRISMA is working on will be using RSS feeds. Therefore PRISMA agrees with the use of RSS feeds to fulfil the requirement under Article 10(1) of the REMIT Implementing Regulation.