

REMIT Common Schema for the Disclosure of Inside Information

Position of the Polska Spolka Gazownictwa (the Polish Distribution System Operator)

Company's business name: Polska Spolka Gazownictwa sp. z o.o.

Main activity: (Gas) Distribution System Operator

Company's registered office: Warsaw, Poland, 25 M. Kasprzaka Street

Company registration number (KRS number, National Court Register): 0000374001, the National Court Register of the District Court for the capital city of Warsaw, XII Commercial Department

NIP (Tax ID): 5252496411

REGON number (national statistical number): 142739519

Legal form: limited liability company (100% shares belong to the PGNiG S.A.)

Polska Spolka Gazownictwa sp. z o.o. is one of the strategic companies for Poland's economy and energy security. Its segment's core activity consists in the transmission of high-methane and nitrogen-rich gas, as well as small amounts of propane/butane and coke-oven gas, via the (gas) distribution network. It's also responsible for extension and modernization of the distribution pipelines and for connecting new clients both to existing pipelines and those under construction.

Introduction

According to REMIT Common Schema for the Disclosure of Inside Information Public Consultation Paper (PC_2015_R_03), the Agency outlined its proposal to further enhance current practices for the disclosure of inside information by providing a proposal for a common set of data fields that are expected to be populated when disclosing such information. The Consultation Paper also included recommendations regarding the implementation of web-feeds for the dissemination of inside information as defined in Article 10(1) of Regulation (EU) No 1227/2011 of the European Parliament and of the Council on wholesale energy market integrity and transparency ('REMIT'). The Agency invited all interested parties to provide comments to the consultation issues listed in the Consultation Paper. Hence, Polska Spolka Gazownictwa sp. z o.o. presents remarks and commentaries on proposal for a common schema for the disclosure of inside information published by The Agency (UMM related to capacity change), which relate to capacity changes in gas (including transmission).

Below we present the position of the PSG.

1. Comments on Message ID.

All 'accepted values' mentioned in the Consultation Paper have been approved. Having a message ID as a unique identifier for each UMM thread, makes sorting and searching for messages easier. However, the use of ASCII code for Message ID should be optional.

2. Update ID (gas capacity)

All 'accepted values' mentioned in the Consultation Paper have been approved. Having an update ID as a unique identifier for each UMM update, makes sorting and searching for the information content changes easier. However, the use of ASCII code for Update ID (should be optional).

3. Event status (gas capacity)

All 'accepted values' listed in the Consultation Paper have been approved. Identification of the condition or position of the message with regard to its standing by marking one of the terms listed in the 'accepted values' field, makes navigation and filtering relevant messages easier.

4. b Message Type (gas capacity)

Polska Spolka Gazownictwa sp. z o.o. proposes another (more detailed) terms related to the gas Distribution System Operator's activity to identify the principal characteristic of the event, in addition to concepts listed in 'accepted values' field:

- gas pipeline unavailability,
- reduction station unavailability
- reduction and measurement station unavailability.

5. Type of Event (gas capacity)

All 'accepted values' listed in the Consultation Paper have been approved. Marking the type of the event makes sorting the messages into main event types, which may have different timeframe and implications on markets, easier.

6. /b Affected Asset (gas capacity)

Stating the official name of the affected asset makes identification and location of the entity, where the event occurred, significant information for readers of the UMMs.

7. /b Affected Point EIC Code (gas capacity)

Polska Spolka Gazownictwa proposes that identifying the entity where the event occurred using EIC code (Energy Identification Code) should be optional. EIC codes are the international codes used by the market participants and other entities active within the Energy Internal European Market (IEM). Polska Spolka Gazownictwa does not enter into cross-border transactions, therefore obtaining those codes will be an additional administrative obligation, which is fulfilled solely for the purposes of disclosing information under REMIT regulation.

9. /b Balancing Zone (gas capacity)

The same remark as to the point 6 b above.

Furthermore, it should be defined whether information in the 'balancing zone' category concerns technical balancing or commercial balancing.

10. /b Unavailable Capacity (gas capacity)

Disclosure of 'unavailable capacity' allows to derive the possible impact of the event on wholesale energy prices by readers of the UMMs.

11. /b Available Capacity (gas capacity)

Disclosure of 'available capacity' allows to derive the possible impact of the event on wholesale energy prices by readers of the UMMs.

12. /b Nominal Capacity (gas capacity)

Disclosure of 'nominal capacity' allows to derive the possible impact of the event on wholesale energy prices by readers of the UMMs.

13. Decision Time

In this field the description should be expanded of an example regarding unplanned unavailability.

It was indicated that the date and time must be expressed in ISO 8601 time format using UTC time. Having regard to the facts of an unplanned unavailability, publishing time when the decision was made to the seconds may cause difficulties. It will be sufficient to define time to the minutes.

15. Event Start (gas capacity)

It was indicated that the date and time of an 'event start' must be expressed in ISO 8601 time format using UTC time. Having regard to the facts of an unplanned unavailability, publishing time of 'event start' to the seconds may cause great difficulties. It is practically impossible to establish and provide the precise time of an event start. In normal circumstances the Distribution System Operator does not know the details of an event, because the DSO is informed about an outage by the third parties, primarily by the participants or observers. The time of an event notification is the time of an event start. Furthermore, it should be stressed that dissemination of the time event to the minutes can only have estimative character. There is a contradiction between the description and accepted values. In the description it was indicated that starting time may be estimated what excludes ISO 8601 format specified in 'accepted values'.

In the consultation paper it was stated that information should be published in the official language of the relevant Member State and in English or in English only. To our estimation information should be published only in the official language of the relevant Member State. Publishing information in English is an additional burden mainly for the employees of the gas dispatch centre, who in Poland are responsible for publishing inside information and sometimes do not defectively communicate in English. The solution, according to which the transcription of an inside information may be provided during next day after publication, is acceptable.