



RESPOND TO CONSULTATION PAPER
25.6.2015

**Public Consultation on the Common Schema for the Disclosure of Inside Information
PC_2015_R_03**

As an reply to ACER public consultation paper and questions presented, UPM sees following issues to be considered:

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

Because the current economic situation in Europe permanent changes in companies consumption and productions facilities are more than likely. It is not clear how those changes should be informed by UMM in the documented framework? UPM sees that there should be way to inform the market about permanent changes to production and/or consumption capacities – shutdowns, refurbishments etc.

According to the document, the event uncertainty should be placed in the remarks. However, currently Nord Pool Spot uses a drop down list of alternatives to choose from, and uncertainty is only applicable to really big production units. Our proposal is to have to have a similar scheme for uncertainty in the future than Nord Pool Spot. With the current way proposed it is not obvious on what level (hours, minutes, days?) should the uncertainty be understood and this might lead to very different interpretation of level of uncertainty to be informed among Market Participants.

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

UPM sees that “impact on emission allowance prices”-field should be removed as it is very difficult to estimate on a European level market with current level of information. There needs to be at least very thorough set of examples which kind of situations would have an impact – a permanent shutdown, a prolonged nuclear revision, or something else?

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)?

We see that current proposal of fields and descriptions fits well to current UMM market practices at Nord Pool Spot market area, and should be mostly taken in use as proposed by ACER. There are still few comments and additions we would like to highlight:

Field identifier; Fuel type

Biomass should be also included as Fuel type

Field identifier: Type of event

This field only includes planned and unplanned unavailability. How does one inform about permanent changes to (especially) consumption?

Field identifier: Unavailable/Available/Nominal Capacity for gas

We see that the unit of MWh/d is a good for informing changes in Gas capacity. Especially this is in cases where the unavailability is not full days. E.g. a situation where a 100MW nominal consumption unit is unavailable for a period of 3 hours, which overlaps two consecutive gas days. How does one report that? With two different UMMs, one with capacity 100MWh/d (1 hour of unavailability) and a second one with 200MWh/d (2 hours)? Or 2400MWh/d unavailability? This should be similar to the capacity of electricity markets, where it is MW, as described in this document. Otherwise we see that it will cause confusion and errors. Also it is not mentioned, whether gas day is local or UTC time?

Field identifier: Remarks

There should be some guidelines as to what kind of uncertainty should be reported. Also if there is some limits to when the uncertainty is a must.

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?

This seems feasible.