



**ČEZ response to the ACER consultation on
"Common Schema for the Disclosure of Inside Information (PC_2015_R_03)"**

Generally, ČEZ, a.s. welcomes the opportunity to respond to this consultation. Indeed, it is important to seek for common standards in inside information disclosure. ČEZ supports the view that the existing market transparency platforms schemes shall be taken as good basis and valuable source of the best practices. Indeed, many issues related to data disclosure (i.e. content & format of the fields, overall design, etc.) has been already addressed and solved and can therefore be applied to the ACER's scheme as well.

General remarks:

On single European platform - at the moment the obligation to publish inside information as per REMIT ((EU) 1227/2011) goes – to certain extent - in parallel with the transparency data producers are obliged to disclose on EMFIP performed by ENTSO-E in accordance with Transparency regulation (EU) 543/ 2013). Although, both schemes are operated separately there is substantial overlap in data published. Indeed, the European power producers fall under both obligations and therefore effort shall be made to avoid duplicity in reporting. Consequently, we firmly believe that ACER shall closely co-operate with ENTSO-E and aim to establish the uniform inside information & fundamental data reporting platform.

Furthermore, we are of the opinion the ACER shall leverage on the outcome of this consultation and draft a list of examples of how particular types of event shall be properly disclosed.

Box 1: Questions related to the proposed schemas

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

We propose to add the field „Reason for unavailability“ as subcategory of „Message Type (subparagraph 3.2., point 4.a.). There might be limited categories used. For instance EEX Transparency Platform currently works with the following types of sub category – “Maintenance”, “Outage”, “External factors” and “Other”. We believe this can be valuable piece of information for many data users.

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

- field „Update ID“ (subparagraph 3.2., point 2) – we are not sure if this field is necessary as mandatory field. The current practice we have experienced is that the unique event ID is assigned to



the new event and any updates are linked to the original ID so the whole event thread is easily seen and accesible.

- field „Decision time“ (subparagraph 3.2., point 14) – this field is neither required by REMIT nor it is easy to determined exactly when such time occurs. It may lead to uncertainties in practical application while bringing no additional value to any data users.

field „Impact on carbon prices“ (subparagraph 3.2., point 20) - this is simply not in scope of REMIT obligation. We welcome the aim and understand the effort to align both REMIT and MAD discosure requirements. However, unless the broad agreement is made between ACER, ESMA and energy industry on how to harmonise both procedure it shall not be implemented.

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 do not have any comments

Box 2: Question related to the implementation of web feeds

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?

Basically, we agree with the RSS feed, however, ACER shall strive to be technology neutral in the practical application. Essentially, the careful consideration shall be made to the volume of data processed as well as requirements on its availability. On this basis, the best standard shall be chosen.

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