

## ebIX<sup>®</sup>

The purpose of ebIX<sup>®</sup>, the European forum for energy Business Information eXchange, is to advance, develop and standardize the use of electronic information exchange in the energy industry.

The main focus of ebIX<sup>®</sup> is on interchanging administrative data for the internal European markets for electricity and gas. ebIX<sup>®</sup> shall cover the needs for the the retail market (downstream) and the interface to the wholesale market (upstream).

ebIX<sup>®</sup> provides standardized and harmonized processes for the liberalized downstream electricity and gas markets with the focus on information exchange, following EU rules and allowing national customization.

### ACER questions and ebIX<sup>®</sup> responses

	ACER question	ebIX <sup>®</sup> response
1.	Regarding fields 112 and 316 ('VAT number' of the market participant and ultimate controller), taking into consideration that some market participants and ultimate controllers do not have a VAT number, ACER proposes to add an additional checkbox labeled: 'I do not have a VAT number.' Moreover, taking into account that different formats for VAT identification apply outside the European Union, ACER proposes to adopt a more flexible format for fields 112 and 316 for non-EU market participants. Do you agree with this change? If not, please justify your reply.	No ebIX <sup>®</sup> response.
2.	Regarding the reformulation of field 113 (Energy Identification Code ('EIC') of the market participant):	<p>The ebIX<sup>®</sup> response you ask for, focuses on 2 main topics.</p> <ol style="list-style-type: none"><li>1) For ID-schemes to last over time, no significance attached to (elements in) the scheme shall be allowed. Let alone be ordained by or included in the definition of the scheme.</li><li>2) Information registered for the issuance of an ID is very distinct from master data for the object that is to be identified.</li></ol> <p><b>Ad 1) significance</b></p> <p>The very basic rule not to derive any significance from an ID nor to attach any significance to an ID is supported by countless lessons learned in the European energy market and numerous other</p>

	<p>business sectors all over the world.</p> <p>Nevertheless EIC-schemes not only allow for attaching significance to an ID. The very definition of the schemes specifies included significance, such as the mandatory fields you refer to (X, Y, Z, ..etc.) and the mandatory functions (which are not compatible with the functions used by the same market participants in the downstream market)</p> <p>Any kind of significance in an ID will inevitably (over time) lead to confusion and misunderstanding. This is true for EIC as it is for any other ID-scheme. At this moment with regard to EIC for example the different usage in downstream and wholesale markets (see above). And for EIC this is already illustrated by some countries which use an EIC-type national (historical reasoned) in another way as international. With regard to identification neither the different usage national/international nor the German plans of migration for balance groups from X- to Y-ID's would have occurred had not the very specification of the EIC scheme required significance in the form of an X with a meaning or a Y with another significance.</p> <p>In order to reduce trouble and to enhance the chances of the EIC scheme to last over a considerable period of time, ebIX<sup>®</sup> strongly suggests ACER to ask ENTSO-E (and ENTSO-G for that matter) to remove any requirement about significance in the EIC ID-schemes from its specifications as soon as possible<sup>1</sup>.</p> <p>Additionally the removal of any significance from the EIC ID-schemes, will turn the use of these schemes into a viable option for those countries that till now consciously have refrained from using the EIC ID-schemes just because of the attached or required significance.</p> <p><b>Ad 2) master data</b></p> <p>Master data for an object (such as a party) fundamentally differs from data registered for the issuance of an ID for the object. The register should contain information required for the issuing and its related processes (such as billing</p>
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<sup>1</sup> The removal of the significance of the X, Y, Z, ... etc. in the ID doesn't need any change of the ID itself. It implies just the lifting of the added significance. Therefore the implementation of this suggestion can be done in a relatively short period of time and at very limited cost (and anyway at a fraction of the time and cost required for a migration from X- to Y-ID's for balance groups).

for the use of the ID). In contrast master data contain information required by the business processes in which the identified object is involved. Master data may be composed of various blocks of information. For each of these blocks a distinct party is to be made responsible. But normally neither of these parties will be the party issuing the ID. And finally the responsibility making the master data available has to be assigned to a specific party -which doesn't have to be (and seldom is) the party responsible for issuing the ID.

However with regard to EIC there is no distinction between register and master data and neither is there a distinction in responsibility. Nor has there been a conscious decision on which party should be made responsible for providing the master data of the identified object to other parties related to it or using it.

Normally the specification of master data is the result of data modelling of the processes requiring such master data.

For about 20 years eblX<sup>®</sup> is involved in the data modelling for the business processes in the retail part of the energy market. These processes, as the proper functioning of the liberalized markets, heavily rely on the use and the quality of master data. The same master data which in the end also are basic for and therefore partly specified by the wholesale processes such as nomination/allocation and settlement. The eblX<sup>®</sup> model comprises these master data relevant for both the wholesale and the retail part of the energy market.

It is with this vast experience that eblX<sup>®</sup> recommends to clearly distinct between master data and a register related to the issuing process of just the ID for an object. And to base the requirements for master data on the requirements of the related business processes. Requirements to be made specific, clear and complete by means of modeling the processes and the data. Where one of the sets of requirements stems from the business processes for which ACER takes responsibility.

eblX<sup>®</sup> is prepared to consider providing support for such development, when asked for.

2.	<p>a. EIC codes are widely used for reporting transaction and fundamental data. The current registration format allows only one EIC code to be provided by a market participant, although there may be several different types of EIC codes related to the same market participant and used for reporting. Moreover, although the EIC codes are publicly available, other pieces of information, such as the location of the facility identified by the EIC code, are not public. Taking into consideration the need to identify for monitoring purposes to which market participants different EIC codes belong to, the current registration format can be developed to allow the introduction as mandatory fields of all EIC codes (i.e.: EIC X, EIC Y, EIC Z, EIC T, EIC W and EIC A) related to the same market participant. What are the pros and cons of such an approach? Please explain.</p>	<p>On the basis of this text we assume that what is intended is to set up a set of master data. We assume that when is referred to “EIC codes” reference is made to EIC as the identification of a party (such as a trader). So probably what is intended is to enhance master data for a party with information about other relations to other parties, relations to Metering Points / Areas, installations, tielines, ...etc.</p> <p>Based on the ebIX<sup>®</sup> experience with developing master data, we have the following suggestions/remarks:</p> <ul style="list-style-type: none"> <li>○ Master data serve a purpose. Please be specific about this purpose in clear business requirements;</li> <li>○ Master data is more than just relations between ID's. Master data basically links a set of characteristics (including relations to other objects) for an object to its ID and makes this set available to whom is entitled to this information;</li> <li>○ In order for master data to be valuable, it has to be maintained. The quality of maintenance is enhanced by involving other parties by means of their self-interest.</li> <li>○ Talking about several ID's for a party: please be convinced that each party (legal entity) only has one and only one ID in order to be identified. Of course other objects may be linked to this party through their ID.</li> <li>○ Finally: we see that only reference is made to EIC ID's. Please be aware, that EIC ID-schemes are in use mainly in the wholesale part of the energy market. In the retail part of the energy market EIC isn't much used and other ID-schemes (such as GS1) are predominant.</li> </ul>
2.	<p>b. In case the introduction of all EIC codes used for reporting by a market participants (see previous question) is allowed by the European register, the Registration Format could be expanded to:</p> <ul style="list-style-type: none"> <li>• identify the name of the object to which the EIC code relates (e.g.: name of</li> </ul>	<p>What is referred to in this section, could be regarded as a beginning of business requirements for the master data of a party (market participant). Unfortunately mixed with characteristics of the objects to which a party is related (example: address of an object). Our suggestion would be: specify the master data per type of object. The reference to the ID of another object may be part of the master data. Through referencing the unique ID the whole set of master data for this (related) object becomes</p>

	<p>the power plant),</p> <ul style="list-style-type: none"><li>• identify the address of the object to which the EIC code relates (e.g. location of a power plant identified by X EIC code),</li><li>• identify the country where the market participant or the object is physically registered (e.g. in case of Y, T EIC codes, all countries which lie in the area of the Y, T EIC code,</li><li>• identify the market participant's role/relationship with the submitted EIC codes in order to differentiate situations where one code is used by more than one market participant. The Agency has identified the following relevant roles:<ul style="list-style-type: none"><li>○ Proprietor/owner of the object to which the entered EIC code relates</li><li>○ Operator of the object to which the EIC code relates</li><li>○ Other role which has information about the object to which EIC code relates</li></ul></li></ul> <p>i. Do you agree with the possibility to add these mandatory fields in order to identify each EIC code? If not, please justify your reply.</p> <p>ii. Would you like to add/reformulate any other potential role/relationship of a market participant with the submitted EIC codes to the ones mentioned in the list above?</p>	<p>available.</p> <p>However: keep in mind, that any set of master data will only be useful when it is up-to-date. Therefore when specifying business requirements for master data, please also pay attention to maintenance (see our remarks in 2.a.).</p>
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<p>3.</p>	<p>Field 116 (Global Location Number of the market participant - 'GS1' in the coding scheme) is rarely used by market participants. Do you agree that this field is removed from the European Register? Please explain your reply.</p>	<p>ebIX<sup>®</sup> strongly recommends <b>not to remove</b> the use of the GS1 identification scheme. Although we can imagine that the use of this ID-scheme in the present phase of registrations is fairly limited, we suggest not to underestimate the widespread use of GS1 identification in many countries, especially in the retail part of both the electricity and the gas market. (for example: there are much more ID's issued for market participants as GS1 than as EIC. In Germany more than 6000 GS1 ID's are being used in the information exchange in the energy market.)</p> <p>Especially at the moment where a closer cooperation between TSO's and DSO's starts to take shape, an outspoken choice by ACER in favor of an ID-scheme mainly used by TSO's and a rejection of an ID-scheme mainly used by DSO's may well send a wrong signal.</p> <p>Additionally, the present difference in observed relevance of activities, such as generation, on a wholesale level as opposed to the retail level, may well change in the near future. This could bring ACER requirements to stretch out to objects that at present are regarded to be at retail level. Therefore the suggested removal could very well lead to serious regret over time. Especially since the number of objects involved on retail level is of a different magnitude.</p>
<p>4.</p>	<p>Field 118 ('Trade Register') was requested by some NRAs. Would it be adequate to allow for special characters in this field? If not, please justify your reply.</p>	<p>ebIX<sup>®</sup> cannot establish the necessity of special characters as requested by NRA's.</p> <p>However in case of allowing for special characters, we would suggest to first verify for each of these characters the possibility to use such a character in information exchange based on international standards for character sets used.</p>
<p>5.</p>	<p>The Implementing Regulation lays down the provision to include Trader IDs in transaction reports (field 3 of Table 1 in the Annex to the Implementing Regulation). The Trader ID is the login username or trading account of the trader and/or the market participant or counterparty as specified by the</p>	<p>No ebIX<sup>®</sup> response.</p>

	<p>technical system of the organized market place. The field '<b>Trader IDs</b>' may be added to the European Register as part of the market participant's registration information to make it easier to link different trader IDs to one specific market participant for market monitoring purposes. Do you agree with this proposal and what are the pros and cons of this? Please explain your reply.</p>	
6.	<p>Field 120 ('<b>Publication Inside Information</b>') is currently filled by many market participants with a general link (for example, a link to the company's main webpage) and not with the exact location where the inside information publications are published. Do you agree to refine its definition so that it is clearly stated that the URL(s) should indicate the exact address where the inside information is disclosed publicly and, to create a new field indicating the location of the web-feed used for reporting the publications of inside information to ACER?</p>	<p>No eblX<sup>®</sup> response.</p>
7.	<p>Regarding field 121 ('<b>ACER code</b>'), taking into consideration the need to ensure the traceability of relevant changes in the registration records<sup>2</sup> two new fields could be added to the Registration Format: one indicating previously used ACER codes; another identifying the relationship with the previous codes. The identification of the relationship between ACER codes could be provided by selecting the following types:</p> <ul style="list-style-type: none"> <li>• same person previously registered in another Member State;</li> <li>• incorporation of a registered market</li> </ul>	<p>See eblX<sup>®</sup> responses to question 2.</p>

<sup>2</sup> e.g. de-registration of a market participant in one Member State and registration of the same market participant in another Member State, incorporation of an existing market participant by a new market participant, spin-off from a registered market participant resulting in new market participant(s).

	<p>participant;</p> <ul style="list-style-type: none"> <li>• spin-off from a registered market participant;</li> <li>• other.</li> </ul> <p>i. Do you agree with the above proposal? Please give reasons for your answer.</p> <p>ii. Do you see a more efficient way to ensure traceability of relevant changes in the registration records?</p>	
8.	<p>Section 4 ('<b>Corporate Structure</b>' of the market participant) does not currently provide full transparency on the corporate structure of the market participant. It has been proposed that every market participant registered indicates the VAT number, name, and percentage of ownership of all companies belonging to the same group<sup>3</sup> of the market participant (including company(ies) that are not market participants) as this would increase transparency from a market surveillance perspective.</p> <p>i. What are the pros and cons of such an approach? Please explain your reply.</p> <p>ii. Are there any improvements more generally to the corporate relationship section you would suggest?</p>	See ebIX <sup>®</sup> responses to question 2, since here you touch on an important benefit of the use of proper master data when you wish to solve this issue.
9.	<p>In Section 3 to 5, we understand that some fields may not be self-explanatory. In order to avoid the misinterpretation of the information inserted by a market participant, do you think that some additional free text fields should be included to allow a better description of the particular situation of the market participant? Namely regarding:</p> <ul style="list-style-type: none"> <li>• the main activity of the</li> </ul>	In general, free text fields should be avoided in electronic information exchange, among others because it cannot be automatically read or validated.

<sup>3</sup> In order to limit the administrative burden on market participants the same corporate structure does not have to be re-entered by every market participant belonging to the same group.

	<p>market participant;</p> <ul style="list-style-type: none"> <li>• how the ultimate controller performs such control;</li> <li>• information about the existing/envisaged data reporting agreements.</li> </ul>	
10.	Do you have any other comment on the current fields provided in Annex 1 to ACER Decision 01/2012 on the Registration Format that can further improve the functioning and usefulness of the European register of market participants?	No eblX <sup>®</sup> response.
11. 12. 13. 14.	<b>Questions on the functioning and usefulness of the European Register</b>	No eblX <sup>®</sup> response.
15.	<b>Question on the implementation timeline of changes in the European Register</b>	No eblX <sup>®</sup> response.