

ACER

**Public Consultation on the revision
of electronic formats for reporting
under REMIT**

ANIGAS' feedbacks

Milano, 6th December 2017

Annex B - Form for providing respondents' feedback on proposed changes

Proposed change No. A.1.1

Respondent's view

We understand the aim of the Agency but we believe that the MPs should be facilitated when they have to report lifecycle events. Between the lifecycle events, it is a matter of fact that the novations that occurs for change in the corporate structure of one of the counterparties of deals executed on OMPs could be one of the most burdensome activities.

For this reason, our proposal should be to not allow the use of old version of the tables only for the report with action type NEW. For action type M, C and E the use of the old version of table one should be allowed.

Proposed change No. A.1.3

Respondent's view

In line of principle, we agree with the proposal to align REMIT and EMIR UTI but we believe that this alignment should not reduce the REMIT possibility to have a UTI code characterized by strong uniqueness. This is the reason why we **disagree** with the proposal to reduce the maximum length of the field from 100 to 52 character and also to allow the use of characters like ":" and "." that are allowed for EMIR.

Further, without any specific reference to the integration with EMIR, we would like to express our preference for a UTI that allows only the use of capital letter as it could simplify the sharing of the code between counterparties.

To avoid any misunderstanding, we would like to point out that the UTI rules should be the same both for table 1 and table 2 reporting and that no remediation procedure should be imposed to MPs on the trades already reported.

Proposed change No. A.1.4**Respondent's view**

We believe that should be maintained the possibility to report the so called simple index trade using table 1. For this reason field 36 "Index value" should be maintained to report the difference (+/-) from the fixing index value.

By the way, we highlight that the proposal is not correctly implemented in the XML schema.

Proposed change No. A.2.1**Respondent's view**

We agree with the proposal

Proposed change No. A.4.1**Respondent's view**

We understand the aim of the Agency and the need to improve the Table 4 with minor changes.

Operators put in place huge investments in IT system in order to be compliant with REMIT and the replacement of the existing Edigas schemas with a new schema would not represent a minor change and would require massive workload and cost intensive IT projects.

Taking into consideration that the current reporting process is fully automated and working and new schemas may require manual error-prone transfer of data, we suggest to focus on minor changes proposed in other points of the consultation.

Proposed change No. A.4.2

Respondent's view

We welcome the proposal.

Proposed change No. A.4.3

Respondent's view

We welcome the proposal.

Proposed change No. A.4.4

Respondent's view

We welcome the proposal.

Proposed change No. A.4.5

Respondent's view

We welcome the proposal.

Proposed change No. A.4.6

Respondent's view

We welcome the proposal.

Proposed change No. A.4.7

Respondent's view

We welcome the proposal.

Proposed change No. A.4.8**Respondent's view**

We agree with the proposal presented but also believe that the Agency should clarify if the platform PRISMA (where are recorded a huge number of transactions) is an OMP or not.

Proposed change No. A.5.6**Respondent's view**

We welcome the proposal.

Proposed change No. A.5.7**Respondent's view**

We welcome the proposal.

Proposed change No. A.5.8

Respondent's view

We welcome the proposal.

Proposed change No. A.6.1

Respondent's view

We welcome the proposal.

Proposed change No. A.6.3

Respondent's view

We welcome the proposal.

Proposed change No. A.6.4

Respondent's view

We welcome the proposal.

Proposed change No. A.7.1

Respondent's view

We welcome the proposal.

Proposed change No. A.7.2

Respondent's view

We agree with the proposal if the MPs remain allowed to use UTC format for the date and time (Zulu time reference).

Proposed change No. A.7.3

Respondent's view

We welcome the proposal.

Proposed change No. A.7.4

Respondent's view

We welcome the proposal.

Proposed change No. A.7.8

Respondent's view

We welcome the proposal.

Proposed change No. A.8.1
Respondent's view We welcome the proposal.

Proposed change No. A.8.3
Respondent's view We do not support the proposal since a specific EIC Code do not exist for all the gas facilities (e.g. compression stations, gas pressure reduction stations).

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Annex C - Form for providing additional changes and comments

Data type	Table 2
Impacted field(s)	xsd schema
Description of your change proposal/Other comment	Proposal A.1.1
Motivation for the change	With particular reference to the proposal A.1.1 we would like to underline that also for Table 2 it should be maintained the possibility for the MPs to report lifecycle events using the previous version of the format.

Data type	Table 4
Impacted field(s)	Field No (29) Procedure applicable
Description of your change proposal/Other comment	<p>The value admitted should be:</p> <p>A01 = CFO, call for orders for assignment</p> <p>A02 = FCFS, first come first served for assignment</p> <p>A03 = OTC, Over the counter for assignment</p> <p>A04 = CFO_SUB, call for orders for subletting</p> <p>A05 = FCFS_SUB, call for orders for subletting</p> <p>A06 = OTC_SUB, call for orders for subletting</p>
Motivation for the change	The procedure applicable (CFO, FCFS, OTS) is valid both for assignment and subletting.

Data type	Table 4
Impacted field(s)	Fields No (18) Total price, (20) Reserve price, (21) Premium price
Description of your change proposal/Other comment	<p>The fields 18, 20 and 21 should have a proper field for the unit of measure that not only represents the capacity as it is now in the field 16 "Measure unit" but that also give the information if the price for that capacity is for day or for year.</p> <p>Hereafter some example of the possible units:</p> <p>€/kWh/h/d</p> <p>€/kWh/h/y</p> <p>GBX/ kWh/h/d</p> <p>GBX/kWh/h/y</p>

	€/kWh/d/d €/kWh/d/y GBX/ kWh/d/d GBX/kWh/d/y
Motivation for the change	The information on the price that came from the combination of the fields 16 and 17 is not complete.

Data type	Table 1
Impacted field(s)	Fields No (42) (56) Quantity unit
Description of your change proposal/Other comment	For TRUM document should clarify that natural gas trades the value of KWh is expressed at the temperature (usually 0° or 25°) stated in the contract.
Motivation for the change	Temperature is a relevant element for the conversion rate of natural gas.

Data type	Table 2
Impacted field(s)	Fields No (20) Notional quantity unit
Description of your change proposal/Other comment	For TRUM document should clarify that natural gas trades the value of KWh is expressed at the temperature (usually 0° or 25°) stated in the contract.
Motivation for the change	Temperature is a relevant element for the conversion rate of natural gas.

Data type	Table 4
Impacted field(s)	Field No (16) Measure unit
Description of your change proposal/Other comment	For TRUM document should clarify that natural gas trades the value of KWh is expressed at the temperature (usually 0° or 25°) stated in the contract.
Motivation for the change	Temperature is a relevant element for the conversion rate of natural gas.