

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

Proposed change No. *

A.1.3

Respondent's view *

Whilst the harmonisation of REMIT and EMIR UTI formats may have been useful at the start of the REMIT reporting phase, we do not believe the proposed changes are particularly beneficial to most market participants now, as most participants will already have put in place systems and processes to generate UTIs based on the existing requirements and will be familiar with these following use for some time now.

As such we do not believe this change will add much value, but instead will lead to additional costs for market participants in making changes to systems, processes. We therefore believe that ACER should keep the UTI format as it currently is and not make any changes.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

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

Proposed change No. *

A.1.5

Respondent's view *

We appreciate the concern that some market participants may not be reporting the "*Total notional contract quantity*" field when they should be reporting this field. However, as a first step we suggest that ACER should strengthen its reporting guidance documentation to make clear to market participants that greater consideration should be given by them as to whether this field should be reported.

ACER recognises that there are incidences where contracts may not need to report this field and suggest, in these cases, that a mock value should be provided. However, this may result in market participants providing differing mock values, potentially increasing confusion and inconsistencies in data reporting.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

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

Proposed change No. *

A.4.1

Respondent's view *

Similar to our response to proposed change A.1.3, whilst we believe the proposed approach might have been useful at the start of REMIT transaction reporting, most market participants now have long established reporting systems in place based on the existing reporting requirements.

To changes these systems and processes would incur additional costs and will achieve, in our view, limited benefits. As such we do not believe the proposed changes should be implemented.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

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Proposed change No. *

A.7.5.

Respondent's view *

We would appreciate greater clarification on the change being proposed under A.7.5. In particular, it is not clear to us what the section in parenthesis refers to.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**