BULGARTRANSGAZ'S RESPONSE TO
ACER PUBLIC CONSULTATIONS
PC_2017_R_03

ON
REVISION OF ELECTRONIC FORMATS FOR TRANSACTION DATA, FUNDAMENTAL DATA AND INSIDE INFORMATION REPORTING

BULGARTRANSGAZ

BULGARTRANSGAZ

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ABOUT BULGARTRANSGAZ

Bulgartransgaz EAD is a combined operator (TSO and SSO) performing licensed activities of natural gas transmission and storage. Bulgartransgaz EAD is certified as an Independent gas transmission operator.
The Company is an owner and operator of:

o   National gas transmission network with major function – natural gas transmission on the territory of Bulgaria to natural gas distribution companies and industrial consumers

o   Transmission network for transit transmission - natural gas transmission through the territory of Bulgaria to the countries Romania, Turkey, Greece and FYROM

o   Underground gas storage in Chiren (Chiren UGS) with major function – natural gas storage for covering the seasonal fluctuations in consumption and delivery of natural gas

Bulgartransgaz is registered as Market Participant with ACER Code A0001038B.BG and

Registered Reporting Mechanism type TSO authorized to report REMIT information for the data types REMITTable 1, REMITTable 2, REMITTable 4 (GASCAPACITYALLOCATIONS DATA), Gas fundamental data (NOMINATIONMONITORING DATA). As storage system operator, Bulgartransgaz reports to the Agency information for UGS Chiren through the GIE's AGIS+ platform.

BULGARTRANSGAZ

INTRODUCTION

Bulgartransgaz EAD welcomes ACER's public consultation on "Revision of electronic formats for transaction data, fundamental data and inside information reporting - PC_2017_R_03" and the opportunity to provide its view and suggestions.

Bulgartransgaz's aspiration with this response is to support Agency's efforts in consulting the proposed changes to the electronic (XML) formats that are currently used for the reporting of transaction data, fundamental data and inside information to the Agency's REMIT Information System (ARIS) and thus:

o   Improving the quality, completeness and usability of the reported data under REMIT
o   Simplifying and facilitating the reporting process
o   Providing as much as possible information to the market, regarding the events of unavailabilities of gas facilities
o   Solving existing issues, imposed by the limitations of currently used REMIT electronic formats

Bulgartransgaz's response consists of:

o   Feedback on the proposed changes to reporting standard contracts in accordance with Table 1 of the Implementing Acts
o   Feedback on the proposed changes to reporting non-standard contracts in accordance with Table 2 of the Implementing Acts
o   Feedback on the proposed changes to reporting gas transportation contracts in accordance with Table 3 of the Implementing Acts
o   Feedback on the proposed changes to reporting gas transportation contracts in accordance with Table 4 of the Implementing Acts
o   Feedback on the proposed changes to fundamental data reporting
o   Feedback on the proposed changes to inside information reporting
o   Feedback on the proposed miscellaneous changes applicable to more than one data type
o   Additional changes and comments proposed by Bulgartransgaz

Our feedback and the additional changes and comments are provided in the forms defined and required by the Agency.

We would be delighted to be given the opportunity to discuss our response with the Agency's team and to participate to the next steps of the process of revision of the REMIT electronic formats. Should you have any questions and/or comments and/or require further information, please do not hesitate to contact us.

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A1. FEEDBACK ON THE PROPOSED CHANGES TO REPORTING STANDARD CONTRACTS IN ACCORDANCE WITH TABLE 1 OF THE IMPLEMENTING ACTS

Proposed change No. A.1.1

The Agency proposes to stop reporting with the REMITTable_V1.xsd and REMITTable1_V2.xsd schemas by 31.03.2019 and allow the use of one single schema: REMITTable1_V3.xsd.

Reason for the change
The majority of RRMs are using REMITTable1_V2.xsd. Seventy percent of all Table 1 data was reported using REMITTable1_V2.xsd. The current schemas have some limitations and have to be updated. Thus, any approved change of REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas will be implemented within REMITTable1_V3.xsd

Bulgartransgaz's view

We consider the proposal to integrate the improvements for solving the limitations of REMITTable_V1.xsd and REMITTable1_V2 in a new REMITTable1 version 3 as reasonable.

We would like to suggest to the Agency to update accordingly the TRUM document after the implementation of the relevant schema changes and define rules that have to be followed after the "transition period" (of simultaneous usage of the current and the new schemas) for update/modification/cancelation of reports submitted to ARIS before the date of Go-life of the new schemas with the currently used ("old") schemas.

Proposed change No. A.1.2

The Agency proposes that Data Field No (35) Price and Data Field No (40) Quantity of Table 1 of REMIT Implementing Regulation are reportable within the *"price time interval section"* of REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas instead of their own field.

Reason for the change
The simplification of the schema. Reporting entities will not be able to report price and quantity in one or the other section, as this creates inconsistencies in data reporting. This change would therefore enhance data quality for monitoring purposes.

Bulgartransgaz's view

We do not object to this change.

We would like to suggest to the Agency to update accordingly the TRUM document and provide clear guidance on the new requirements and properties of the affected fields.

Proposed change No. A.1.3

The Agency was asked to propose a way to harmonize the UTI format with the one used under EMIR, taking into consideration the UTI length and allowed characters.
Reason for the change - To allow reporting parties to report their trade data under REMIT with the same UTI format of data reported under EMIR.

Reason for the change
To allow reporting parties to report their trade data under REMIT with the same UTI format of data

reported under EMIR.

Bulgartransgaz's view

In our view, the change of the UTI format would have value only if the parties reporting both under REMIT and EMIR could use one and the same UTI generating tool. The usage of a single UTI generating tool would be possible if the requisites for the generation of the EMIR UTI code and REMIT UTI code are the same. If this is not the case and the harmonization of the UTI formats for REMIT and EMIR reporting will not avoid the usage of different tools for generation of UTI codes for both of the processes, we consider that the proposed change will not bring significant value to the improvement of the reporting process. In addition, we are on the opinion that the change will impose additional efforts and costs for modification of the existing UTI generating tools and the adjacent reporting systems.

Proposed change No. A.1.5

The Agency proposes to change the cardinality of Field No (41) "Total notional contract quantity" in REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas from optional to mandatory.
Although some contracts may not have a "Total notional contract quantity" value, i.e. index trades, this field can be reported with a mock value e.g. 9999999.9999.

Reason for the change
To prevent instances of reporting parties failing to report the "Total notional contract quantity". The amendment of the schema in such a way that reporting entities will not have the option to choose whether or not to report "Total notional contract quantity", as this creates inconsistencies in data reporting. This change would therefore enhance data quality for monitoring purposes.

Bulgartransgaz's view

We are on the position that if the reporting parties/market participants possess the needed data, they shall provide it in the report files regardless of the cardinality of the respective XSD element.
We agree that the chances to collect the required data through the usage of mandatory XSD fields is bigger, but we have some doubts on whether the proposed change – to turn the element "Total notional contract quantity" from optional to mandatory - will significantly improve the data quality.

Our considerations are based on the following:
o   If the XSD element for Field No (41) is mandatory and the reported contract does not have "Total notional contract quantity" or the reporting parties/market participants do not possess this information for any reason, this could obstruct the reporting of any data for the relevant contract and this would have worse effect on the REMIT data collection and data quality, compared to the effect from the absence of a single value for the "Total notional contract quantity" whose approximative value could be derived from the data for the duration of the delivery period (Delivery start and end date, Delivery interval) and the Quantity/Volume information.
o   We are on the position that arbitrary/mock values shall be used only as a workaround with the aim to avoid schema modifications. We do not consider reasonable to introduce changes and solutions that as from their establishment would impose reporting limitations and would require workarounds.

With regards to the mentioned above, we do not support the proposed schema modification for change the cardinality of Field No (41) "Total notional contract quantity" in REMITTable1_V1.xsd and REMITTable1_V2.xsd from optional to mandatory.

In case that the proposed schema change will be proceeded, we would suggest the usage of a different arbitrary value for the cases when the "Total notional contract quantity" cannot be defined. We think that 9999999.9999 is a realistic one that could happen in practice. We would suggest for example the minimal value allowed by the schema: *0.00001*.

In addition, for the same cases, we would suggest to the Agency's team to define arbitrary value for the relevant units to be specified in *Data field No (42) Quantity units for field 41* that according to ACER's observations is rarely or never used in the REMITTable 1 reports, for example: *MMBtu*.

Proposed change No. A.1.6

The Agency proposes that Data Field No (52) "Load type" of REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas changes from optional to mandatory.

Reason for the change
Reporting entities will not have an option to report Data Field No (52) "Load type" or not, as this creates inconsistencies in their data reporting and affects the data quality performance of reporting parties.

Bulgartransgaz's view

We understand the Agency's team concerns on the REMIT data quality and completeness, and agree that the chances to collect the required data through the usage of mandatory XSD fields is bigger.

Our position is that the REMIT schema changes shall facilitate the reporting process which will naturally lead to improved data quality and completeness. Regarding this, we think that the modification of any XSD element's cardinality from optional to mandatory may impose obstructions which could hamper the reporting process by making the data submission/reporting impossible in case of missing data.

If the proposed change is proceeded and the Data Field No (52) "Load type" of REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas will be defined as mandatory,
we would like to suggest to the Agency to update accordingly the TRUM document and provide clear guidance on how the field shall be populated when the load type is not specified in the contract, and more specifically in case of bilateral trades when the load type is not defined in the contract.

A2. FEEDBACK ON THE PROPOSED CHANGES TO REPORTING NON-STANDARD CONTRACTS IN ACCORDANCE WITH TABLE 2 OF THE IMPLEMENTING ACTS

Proposed change No. A.2.2

The Agency proposes that Data Field No (44) "Load type" of Table 2 of REMIT Implementing Regulation changes from optional to mandatory.

Reason for the change
Reporting entities will not have an option to report Data Field No (44) "Load type" or not, as this creates inconsistencies in their data reporting and affects the data quality performance of reporting parties.

Bulgartransgaz's view

We understand the Agency's team concerns on the REMIT data quality and completeness, and agree that the chances to collect the required data through the usage of mandatory XSD fields is bigger.

Our position is that the REMIT schema changes shall facilitate the reporting process which will naturally lead to improved data quality and completeness. Regarding this we think that the modification of any XSD element's cardinality from optional to mandatory may impose obstructions which could hamper the reporting process by making the data submission/reporting impossible in case of missing data.

If the proposed change is proceeded and the Data Field No (44) "Load type" of REMIT Table 2 schema will be defined as mandatory,
we would like to suggest to the Agency to update accordingly the TRUM document and provide clear guidance on how the field shall be populated when the load type is not specified in the contract, and more specifically in case of bilateral trades when the load type is not defined in the contract.

A3. FEEDBACK ON THE PROPOSED CHANGES TO REPORTING ELECTRICITY TRANSPORTATION CONTRACTS IN ACCORDANCE WITH TABLE 3 OF THE IMPLEMENTING ACTS

Proposed change No. A.3.1

The Agency proposes to simplify the reporting of electricity transportation contracts data with a new schema based on the technical standards of Table 1 and Table 2 schemas: REMITTable1_V1.xsd/REMITTable1_V2.xsd and REMITTable2_V1.xsd.
The new schema will be fully in line with the data fields, defined in Table 3 of the REMIT Implementing Regulation (see Annex D_ XML SCHEMA FOR ELECTRICITY TRANSPORTATION CONTRACTS).

Reason for the change
The schema that is currently used for the reporting of electricity transportation contracts consists of six different "xsd" files and has several mandatory fields that do not need to be reported according to Table 3 of REMIT Implementing Regulation. This obliges market participants to report data that is not listed in Table 3.
The proposed schema will allow market participants to report data only as required by the Regulation.
In addition, the proposed schema would have the same technical standards of Table 1,2 and 4 (e.g. a single file), which will harmonise the reporting of all the different types of transaction data.

Bulgartransgaz's view

Bulgartransgaz won't be affected by eventual modification of the XSD for reporting of electricity transportation contracts data but we would like to express our general view on the proposed change and its effect.

1. Currently, the REMIT reporting of electricity transportation contracts data is done based on the established industry standard IEC 62325 for energy market communication. Applying the same industry based standard for reporting purposes reduces the administrative burden and the costs for implementation and maintenance of the process.
This fully complies with the requirements of Article 19 (3) of Implementing Regulation (EU) N1348/2014, saying that: "*The Agency shall after consulting relevant parties <u>establish procedures, standards and electronic formats</u> **based on established industry standards** for reporting of information referred to in Articles 6, 8 and 9. The Agency shall consult relevant parties on material updates of the referred procedures, standards and electronic formats.*"

2. It is uncertain whether the introduction of a completely new schema for reporting of the data listed in Table 3 of REMIT Implementing regulation, that follows the structure of the ACER's XSDs for REMIT Table 1 and 2 data reporting, could be considered as "<u>*procedures, standards and electronic formats* **based on established industry standards".**</u>

3. Whereas (19) of Regulation (EU) N1227/2011 stipulates that: "…***Reporting obligations should** be kept to a minimum and **not create unnecessary costs or administrative burdens for market participants**……*"

   The proposed change for introduction and usage of a completely new electronic format for electricity transportation contracts data reporting, at this point of time and stage of REMIT implementation, is significant and will invoke massive workload and expensive IT projects for modification of around 25* reporting systems of the electricity TSOs, ENTSO-E, third party RRMs reporting electricity transportation contracts and ARIS.

4. From the reasoning for the proposed change we can understand that the extent of information received through the application of the currently used XSD, based on the industry standard IEC 62325, complies with the scope of data required by the Regulation. Since, the proposed new schema covers the same or even more limited data sets, we consider that the benefit of the suggested "simplification" could not outweigh the costs and efforts for implementation of the

needed changes, and thus could be considered as "...***unnecessary costs or administrative burdens for market participants***...." that according to the principles for performing REMIT shall be avoided.

Furthermore, we would like to share our concerns related to the risks of consulting the introduction of new not tested yet schemas without any sample XMLs reflecting the real business patterns.

If the replacement of the currently used schema will be approved during the consultation process, there is a chance later, at the implementation stage, some unexpected and/or undetected issues (e.g. not appropriate field cardinality, not appropriate field properties – type, length and etc.) to hamper the reporting process. This could invoke unneeded complications and additional discussions between ACER and the affected parties for workaround solutions, application of fake mock values and etc., and could lead to new round of public consultations for approval of the consequential improvements of the new schema.

With these regards, we would do not support the proposed change.

If approved, the new schema and its elements shall be thoroughly explained in the TRUM and MOP documents.

25 is the number of RRMs authorized to report REMITTable 3 data to ARIS, according to ACER List of RRMs with data types.

A4. FEEDBACK ON THE PROPOSED CHANGES TO REPORTING GAS TRANSPORTATION CONTRACTS IN ACCORDANCE WITH TABLE 4 OF THE IMPLEMENTING ACTS

Proposed change No. A.4.1

The Agency proposes to simplify the reporting of gas transportation contracts data with a new schema based on the technical standards of Table 1 and Table 2 schemas: REMITTable1_V1.xsd/REMITTable1_V2.xsd and REMITTable2_V1.xsd. The new schema will be fully in line with the data fields, defined in Table 4 of the REMIT Implementing Regulation (see Annex D_ XML SCHEMA FOR GAS TRANSPORTATION CONTRACTS).

Reason for the change

The schema that is currently used for the reporting of gas transportation contracts consists of five different "xsd" files and has several mandatory fields that do not need to be reported according to Table 4 of REMIT Implementing Regulation. This obliges market participants to report data that is not listed in Table 4.
The proposed schema will allow market participants to report data only as required by the Regulation.
In addition, the proposed schema would have the same technical standards of Table 1, 2 and 3 (e.g. a single file), which will harmonise the reporting of all the different types of transaction data.

Bulgartransgaz's view

We do not support the proposed change. Our position is based on the following arguments:

1. Currently, the REMIT reporting of natural gas transportation contracts data is realized based on Edig@s XSD schema. Edig@s is widely used electronic data interexchange (EDI) standard for information exchange on the European gas supply chain. Applying the same industry based standard for reporting purposes reduces the administrative burden and the costs for implementation and maintenance of the process.
   The usage of Edig@s based schemas for the REMIT reporting of gas allocation transactions complies with the regulation requirements:

   o Article 19 (3) of Implementing Regulation (EU) N1348/2014, saying that: "*The Agency shall after consulting relevant parties <u>establish procedures, standards and electronic formats</u> **based on established industry standards** for reporting of information referred to in Articles 6, 8 and 9. The Agency shall consult relevant parties on material updates of the referred procedures, standards and electronic formats.*"

   o Annex of Implementing Regulation (EU) N1348/2014, Table 4, description of the Field (9) and (14) stipulates that: the transactions and the reports shall "*…**be reported in accordance with current applicable industry standards as specified by gas network code on Interoperability and data exchange**.*"

   o Article 20 (2) of Regulation (EU) 2015/703 (Interoperability network code) defines: "***The data exchange requirements foreseen by** point 2.2 of Annex I to Regulation (EC) No 715/2009, Commission Regulation (EU) No 984/2013, Commission **Regulation (EU) No 312/2014, Commission Regulation (EU) No 1227/2011** and this Regulation between transmission system operators **and from transmission system operators to their counterparties shall be fulfilled by common data exchange solutions set out in Article 21**.*"

   o Article 21 of Regulation (EU) 2015/703 (Interoperability network code) recommends the usage of "*data format: **Edig@s-XML**, or an equivalent data format ensuring identical degree of interoperability.*"

2. It is uncertain whether the introduction of a completely new schema for reporting of the data listed in Table 4 of REMIT Implementing regulation, that follows the structure of the ACER's XSDs for REMIT Table 1 and 2 data reporting, could be considered as "<u>procedures, standards and electronic formats</u> **based on established industry standards**".

3. Whereas (19) of Regulation (EU) N1227/2011 stipulates that: "...**Reporting obligations should be kept to a minimum and not create unnecessary costs or administrative burdens for market participants**....."

   The proposed change for introduction and usage of a completely new electronic format for natural gas transportation contracts data reporting, at this point of time and stage of REMIT implementation, is significant one that will invoke massive workload and cost intensive IT projects for modification of more than 50* reporting systems of the gas TSOs, ENTSOG, third party RRMs reporting gas transportation contracts and ARIS.

4. From the reasoning for the proposed change we can understand that the extent of information received through the application of the currently used Edig@s based schema, complies with the scope of data required by the Regulation. Since, the proposed new schema covers the same or even more limited data sets, we consider that the benefit of the suggested "simplification" could not outweigh the costs and efforts for implementation of the needed changes, and thus could be considered as "...**unnecessary costs or administrative burdens for market participants**...." that according to the principles for performing REMIT shall be avoided.

5. 50* out of 115 RRMs are certified by the Agency to report Gas Capacity Allocations data. The majority of them are gas TSOs whose main reporting volume is not based on supply contracts (on the usage of REMITTable 1 or 2) and for which the "harmonization" of the electronic format for REMITTable 4 with the one for the REMITTable 1 and 2 at this stage of REMIT application will not be "simplification".

Furthermore, we would like to share our concerns related to the risks of consulting the introduction of new not tested yet schemas without any sample XMLs reflecting the real business patterns.
If the replacement of the currently used schema will be approved during the consultation process, there is a chance later, at the implementation stage, some unexpected and/or undetected issues (e.g. not appropriate field cardinality, not appropriate field properties – type, length and etc.) to hamper the reporting process. This could invoke unneeded complications and additional discussions between ACER and the affected parties for workaround solutions, application of fake mock values and etc., and could even lead to new round of public consultations for approval of the consequential improvements
of the new schema.

With these regards, we would like to state that Bulgartransgaz team do not support the proposed change.

*50 is the number of RRMs authorized to report REMITTable 4 data to ARIS, according to ACER List of RRMs with data types.

Proposed change No. A.4.2

The Agency proposes to allow the same currencies in Data field No (17) Currency as in non-standard contracts (Table 2):
BGN=Bulgarian lev
CHF=Swiss franc
CZK=Czech koruna
DKK=Danish krone
EUR=Euro
EUX=Euro cent
GBX=Penny sterling
GBP=Pound sterling
HRK=Croatian kuna
HUF=Hungarian forint
ISK=Icelandic króna
LTL=Lithuanian litas
NOK=Norwegian krone
PCT=Percentage

PLN=Polish złoty
RON=Romanian new leu
SEK=Swedish krona/kronor
USD=U.S. dollar

Reason for the change

The only allowed currency at the moment is Euro. Currently, nine EU Member States are not part of the Euro-Zone - where the national currency is Euro. The denomination of tariffs / prices for capacity products of the TSOs from those countries, as allowed by the national laws, are in local currencies. The transactions for those products and services are performed in local currencies.

The tariffs and auction price steps in national currencies are the basis for the trading decisions that a Market Participant makes.

We believe that the monitoring of transactions should be based on the data and conditions that Market Participants were aware of and familiar with when they placed their orders and concluded their trades.

Bulgartransgaz's view

We support the proposed change and the reasoning behind it.

Furthermore, we would recommend to limit the allowed values to the scope the currency codes defined in the standard ISO 4217.

Additional argumentation for the change:

We are on the opinion that the GASCAPACITYALLOCATION schema, element CURRENCY.CODE (Data field No (17)) shall be changed, other currency codes shall be allowed, respectively accepted by ARIS system and that the conversion from local currencies to Euro, if needed, shall be executed at one centralized location at ACER side.

Currently, nine EU Member States are not part of the Euro-Zone - where the national currency is not Euro. The denomination of tariffs / prices for the capacity products of the TSOs from those countries, as allowed by the national laws, are in local currencies. The transactions for those products and services are performed in local currencies. Since, nether REMIT Regulation, nor TARIFF NC, nor any other Network Code limit the use of national currencies, the ACER requirement for usage of Euro as the single currency for REMIT reporting is clearly discriminatory approach to the entities from Member States outside of the Euro-Zone. This requirement led to delays and imposed much higher costs for REMIT implementation process and establishment of decentralized currency exchange solutions for the entities and RRMs from the Non-Euro-Zone Member States, compared to the expenses for REMIT implementation by the entities from the Euro-Zone Member States, as well as to the cost for development and implementation of a centralized system for currency exchange at ACER/ARIS side.

Moreover, the tariffs and auction price steps in national currencies are the basis for the trading decisions the Market Participant makes.

We believe that the monitoring of transactions should be based on the data and conditions that the Market Participants were aware of and familiar with at the moment of placing their orders and concluding their trades. Currently, the NRAs from the Non-Euro Zone Member States are forced to run their monitoring activities under REMIT by applying reverse recalculation on the data/prices about transactions executed in their national currencies but reported to ARIS in Euro.

The conversion into Euro may cause differences among the price converted into Euro at the day of the auction, the price converted into Euro at the day of invoice release, and the price converted into Euro at the payment day. Thus, at ARIS incoherent information about one and the same transaction is collected, due to the currency conversion and the differences in the exchange rates.

The RRMs are not allowed to interfere and modify in any way the reportable data, so the burden for currency recalculation about the transactions executed on the Booking Platforms/OMPs are bared by the Platform Operators by performing additional time consuming and complex tasks. Calculations of the exchange rates against Euro, made for each TSO separately, may lead to inconsistencies, especially with the bundled products and within-day capacity products.

In our view, the conversion from national currencies to Euro, if needed, shall be executed at ARIS side with uniform approximation and single rate source solution adopted.

If the approximation and exchange differences between the rates should be counted with precision, it

should be done at centralized system and applying one methodology, on similar way as the execution of the functional validation on the REMIT reports.

For the above reasons, we consider the exclusive use of Euro to be discriminatory, that imposed undue development costs for the Reporting entities (TSOs, RRMs, Booking Platforms) reporting to ACER transactions for the markets of the Non-Euro Zone Member States.

Proposed change No. A.4.3

The Agency proposes that the Data Field No (34) Price paid to TSO (Underlying Price) should be composed in schema of 2 fields: price and currency. The latter is missing, which is why the Agency proposes to introduce in the schema a field for currency with allowed values:

BGN=Bulgarian lev
CHF=Swiss franc
CZK=Czech koruna
DKK=Danish krone
EUR=Euro
EUX=Euro cent
GBX=Penny sterling
GBP=Pound sterling
HRK=Croatian kuna
HUF=Hungarian forint
ISK=Icelandic króna
LTL=Lithuanian litas
NOK=Norwegian krone
PCT=Percentage
PLN=Polish złoty
RON=Romanian new leu
SEK=Swedish krona/kronor
USD=U.S. dollar

Reason for the change
The only allowed currency at the moment is Euro.
Currently, nine EU Member States are not part of the Euro-Zone - where the national currency is Euro. The denomination of tariffs / prices for capacity products of the TSOs from those countries, as allowed by the national laws, are in local currencies. The transactions for those products and services are performed in local currencies. The tariffs and auction price steps in national currencies are the basis for the trading decisions that the Market Participant makes.
We believe that the monitoring of transactions should be based on the data and conditions that the Market Participants were aware of and familiar with when they placed their orders and concluded their trades.

Bulgartransgaz's view

The XSD attribute that corresponds to Data field No (34) is UNDERLYINGTSO_PRICE.AMOUNT. The UNDERLYINGTSO_PRICE.AMOUNT is of type Amount.Decimal allowing 17 numeric characters with decimal point included.
The attribute is applicable only in case of secondary market transactions reporting. It is dedicated to indicate in the report file the value of (original) price paid to the TSO (during the primary market transaction).

The currency for <u>all prices</u> in the electronic document are indicated in a special field: CURRENCY.CODE, corresponding to Data field No (17). This schema attribute is mandatory.

With regards to the mentioned above, we are on the opinion that modification of Data field No (34) - UNDERLYINGTSO_PRICE.AMOUNT is not necessary.

If a new schema element *"UNDERLYINGTSO_PRICE.CURRENCY"* will be introduced, the following potential issue may arise:

- The currency indicated by the reporting party in the mandatory data attribute CURRENCY.CODE (that must prevail for all price elements in the report file) is **ABC**;
- The currency indicated by the reporting party in the new element *"UNDERLYINGTSO_PRICE.CURRENCY"* is **XYZ**;

As a result, the report for the secondary market transaction will contain two different currencies – one defining the currency of all price attributes in the report and another, indicating the currency for the UNDERLYINGTSO_PRICE.AMOUNT.

In our view, such cases could lead to inconsistently reported currencies and other issues at the MPs'/reporting party side, as well as - to misinterpretation of the information at Agency's or NRAs' side during the process of data analysis.

If the change would be proceeded, we would like to suggest the new schema element *"UNDERLYINGTSO_PRICE.CURRENCY"* to be optional, with allowed values – all currency codes listed in the proposal A.4.3.

In addition, for consistency purposes, similar change shall be applied for the Data field No (35) TRANFRER_PRICE.AMOUNT, with the introduction of additional optional element *"TRANSFER_PRICE.CURRENCY"* and allowed values – all currency codes listed in the proposal A.4.3.

Proposed change No. A.4.4

The Agency proposes to change the schema restrictions to permit multiple codes for the "ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE" schema field and to add two new codes:
ZSH = Shipper
ZUA = Market Information aggregator
in addition to currently accepted codes:
ZSO = System Operator
ZUJ = Auction office
ZUF = Capacity Platform Operator

Reason for the change
The currently allowed values of the attribute "ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE" do not cover the case and do not offer the possibility to define the right market role of the reporting entity when a Solution provider company (Technical Manager of a system), which is a related undertaking (subsidiary or parent undertaking) company of a TSO, is reporting data to ACER on behalf of the TSO and on behalf of other related undertakings with a holding/company group.
We consider the introduction of the identification of the role of the reporting entities and the use of the coding ZUA=Market Information Aggregator to be appropriate in such cases.

Bulgartransgaz's view

We support the proposed change and the reasoning behind it.

Proposed change No. A.4.5

The Agency proposes to add new accepted codes to the attribute "PRIMARY_MARKETPARTICIPANT.IDENTIFICATION" (Data Field No (27) Market participant identification):
-the code "A01" for an ACER code,
-the code "LEI" for Legal Identifier Entity,
-the code "GLN/GS1" or Global Location Number,
-the code "BIC" for Bank Identifier Code

in addition to currently accepted codes "305" – representing an EIC code.

Reason for the change

Other possible codes for the identification of MPs shall be accepted for the facilitation of data reporting about transactions between two MPs, of which one or both do not have EIC codes.

The introduction of additional codes will harmonise the codes for the identification of Market Participants with the codes used in Table 1 and 2.

Bulgartransgaz's view

We support the proposed change and the reasoning behind it.

Additional details to be taken into consideration:

Currently, the properties of the attribute PRIMARY_MARKETPARTICIPANT.IDENTIFICATION (Data Field No (27)) allow:

- o Maximum length of a **primary market participant's identification** - 16 alphanumeric characters.
- o Maximum length of the coding scheme code - 3 alphanumeric characters.

The type and the length properties of the attribute for the **primary market participant's identification** shall be adapted accordingly to allow the submission of identifiers from all accepted coding schemes: 305, A01, LEI, GLN/GS1, BIC.

Length of the codes for the different coding schemes:

- o 16 alphanumeric characters in case of 305 coding scheme
- o 12 alphanumeric characters in case of A01 coding scheme
- o 20 alphanumeric characters in case of LEI coding scheme
- o 13 alphanumeric characters in case of GLN/GS1 coding scheme
- o 11 alphanumeric characters in case of BIC coding scheme

Proposed change No. A.4.6

The Agency proposes to add new accepted codes to the attribute "TRANSFEROR_MARKETPARTICIPANT.IDENTIFICATION" (Data Field No (36) Transferor identification):

-the code "A01" for an ACER code,
-the code "LEI" for Legal Identifier Entity,
-the code "GLN/GS1" or Global Location Number,
-the code "BIC" for Bank Identifier Code
in addition to currently accepted codes "305" – representing an EIC code.

Reason for the change

Other possible codes for the identification of MPs shall be accepted for the facilitation of data reporting about transactions between two MPs, of which one or both do not have EIC codes.

The introduction of additional codes will harmonise the codes for the identification of Market Participants with the codes used in Table 1 and 2.

Bulgartransgaz's view

We support the proposed change and the reasoning behind it.

Additional details to be taken into consideration:

Currently, the properties of the attribute TRANSFEROR_MARKETPARTICIPANT.IDENTIFICATION (Data Field No (36)) allow:

- o Maximum length of a **transferor market participant's identification** - 16 alphanumeric characters.

- o Maximum length of the coding scheme code - 3 alphanumeric characters.

The type and the length properties of the attribute for the **transferor market participant's identification** shall be adapted accordingly to allow the submission of identifiers from all accepted coding schemes: 305, A01, LEI, GLN/GS1, BIC.

Length of the codes for the different coding schemes:
- o 16 alphanumeric characters in case of 305 coding scheme
- o 12 alphanumeric characters in case of A01 coding scheme
- o 20 alphanumeric characters in case of LEI coding scheme
- o 13 alphanumeric characters in case of GLN/GS1 coding scheme
- o 11 alphanumeric characters in case of BIC coding scheme

Proposed change No. A.4.7

The Agency proposes to add new accepted codes to the attribute "TRANSFEREE_MARKETPARTICIPANT.IDENTIFICATION" (Data Field No (37) Transferee identification):
-the code "A01" for an ACER code,
-the code "LEI" for Legal Identifier Entity,
-the code "GLN/GS1" or Global Location Number,
-the code "BIC" for Bank Identifier Code.
Currently the only accepted code is "305" – representing an EIC code.

Reason for the change
Other possible codes for the identification of MPs shall be accepted for the facilitation of data reporting about transactions between two MPs, of which one or both do not have EIC codes.
The introduction of additional codes will harmonise the codes for the identification of Market Participants with the codes used in Table 1 and 2.

Bulgartransgaz's view

We support the proposed change and the reasoning behind it.

Additional details to be taken into consideration:

Currently, the properties of the attribute "TRANSFEREE_MARKETPARTICIPANT.IDENTIFICATION" (Data Field No (37)) allow:
- o Maximum length of a **transferee market participant's identification** - 16 alphanumeric characters.
- o Maximum length of the coding scheme code - 3 alphanumeric characters.

The type and the length properties of the attribute for the **transferee market participant's identification** shall be adapted accordingly to allow the submission of identifiers from all accepted coding schemes: 305, A01, LEI, GLN/GS1, BIC.

Length of the codes for the different coding schemes:
- o 16 alphanumeric characters in case of 305 coding scheme
- o 12 alphanumeric characters in case of A01 coding scheme
- o 20 alphanumeric characters in case of LEI coding scheme
- o 13 alphanumeric characters in case of GLN/GS1 coding scheme
- o 11 alphanumeric characters in case of BIC coding scheme

Proposed change No. A.4.8

The Agency proposes that the attribute
ORGANISEDMARKETPLACE_MARKETPARTICIPANT.IDENTIFICATION (Data Field No (2) Organised market place identification) is mandatory but DEPENDENT and present ONLY when reporting transactions concluded on an OMP. The attribute is only present when the PROCESS_TRANSACTION.TYPE (Data Field No (9) "Transportation transaction Type") is equal to
ZSW=Ascending clock auction, or
ZSX = Uniform price auction
and other processes executed on an OMP, excluding:
- ZSY = First come first served
- ZSZ = Secondary market procedure

because those transactions do not always or never happen on an OMP.

Reason for the change
Currently the attribute
ORGANISEDMARKETPLACE_MARKETPARTICIPANT.IDENTIFICATION is mandatory. In case of contracts and transactions concluded outside an OMP or concerning points different than these for which the capacity is contracted on an OMP, the reporting entities cannot provide reasonable data in this attribute.
As a workaround, TRUM and Question No 4.2.1 in FAQs on transaction reporting, state that for such cases the reporting entities should use an arbitrary value "21X-XXXXXXXXXXXY".
The proposal would allow to solve the currently existing issue and avoid the use of arbitrary values.

Bulgartransgaz's view

We support the proposed change to make the attribute
ORGANISEDMARKETPLACE_MARKETPARTICIPANT.IDENTIFICATION mandatory but DEPENDENT and present ONLY in case of transactions reporting with **PROCESS_TRANSACTION.TYPE** equal to

ZSW = Ascending clock auction
ZSX = Uniform price auction.

For the rest of the allocation processes the attribute ORGANISEDMARKETPLACE_MARKETPARTICIPANT.IDENTIFICATION shall be optional and the reporting parties could leave it blank, if the reported transaction is not executed on an OMP.

In our view, this change will facilitate the reporting process by solving currently existing issue with the submission of transactions concluded outside an OMP and will avoid the usage of fake codes and arbitrary values.

Proposed change No. A.4.9

The Agency proposes an alignment in the namespace of gas capacity allocation schema with the namespace of the rest of the Edig@s schemas. This means that the current format of the Gas Capacity Allocation schema namespace:
urn:easee-gas.eu:edigas:remit:gascapacityallocationsdocument:5:1
changes to:
urn:easeegas.eu:edigas:remit:gascapacityallocationsdocument:5:1

Reason for the change
A proposal for the alignment in order to harmonise the naming approach of the same family of schemas.

Bulgartransgaz's view

We do not object to the proposed change.

However, we would like to point out that after the change of the namespace, the old files will no longer be valid under the new schema and could not be proceeded with it. This would mean that after the transition period (of parallel use of both schemas – old and new), if an update/modification is needed of allocation data reported before the schema modification with the old namespace, this shall be done by submission of the updated information for the old report in an XML document based on the new schema with the new namespace.

We would suggest to the Agency to provide clear guidance of the procedures for update of old reports after schema change and its namespace modification.

A5. FEEDBACK ON THE PROPOSED CHANGES TO FUNDAMENTAL DATA REPORTING

Proposed change No. A.5.1

ENTSOG Fundamental data – CONTRACTMARKETMONITORING schema

The Agency proposes that the element "IDENTIFICATION" in RULES GOVERNING THE TRANSACTION CLASS (Contract Market Monitoring document – Gas Transparency) changes cardinality from mandatory to optional.

Reason for the change

The attribute is mandatory but not applicable for the ENTSOG reporting purposes. There are no transactions that shall and could be identified by ENTSOG because the reporting obligations of ENTSOG simply consist of transferring to ARIS the fundamental data that has been published in an aggregated manner by the TSOs on the ENTSOG Transparency Platform.

Information about any of the transactions is not available at the ENTSOG TP and it is not possible for ENTSOG to populate this mandatory attribute.

Bulgartransgaz's view

We support the proposed change and the reasoning behind it.

Proposed change No. A.5.2

ENTSOG Fundamental data – CONTRACTMARKETMONITORING schema

The Agency proposes to add new field(s) RESPONSIBLETSO_MARKETPARTICIPANT.IDENTIFICATION + Coding scheme for the identification of the TSO on whose behalf ENTSOG is reporting data to ACER as part of the RULES GOVERNING THE CONTRACTMARKETMONITORING_DOCUMENT CLASS.

The following values should be allowed for the TSO identification:

- the code "A01" for an ACER code,
- the code "LEI" for Legal Identifier Entity,
- the code "GLN/GS1" or Global Location Number,
- the code "BIC" for Bank Identifier Code,
- the code "305" representing an EIC code.

Reason for the change

Currently, the schema does not make it possible for ENTSOG to indicate which TSO published the data that is included in and submitted to ACER report. This is why ENTSOG and the ACER team agreed to use as a workaround the field TRANSACTION IDENTIFICATION, which is mandatory in the same schema but cannot be populated by ENTSOG because it is not relevant to the ENTSOG reporting process nor to the scope of data that ENSTOG reports to ACER.

In order to avoid using inappropriate fields for the identification of the TSO whose TP data is reported to ACER, we consider as reasonable the introduction of a new special attribute.

Bulgartransgaz's view

We support the proposed change and the reasoning behind it.

In addition, we would like to clarify that all gas TSOs that are publishing aggregated fundamental data on ENTSOG Transparency Platform (TP) possess X-type EICs for party (company) identification. It is ENTSOG Transparency Platform general rule to accept data from TSOs identified with EIC.

The electronic format CONTRACTMARKETMONITORING is used solely by ENTSOG for reporting data from ENTSOG Transparency Platform to ARIS, as required by Article 9(1) of REMIT Implementing regulation.

This is the reason why we believe that it would be sufficient if the only allowed values and coding scheme

for the new attribute RESPONSIBLETSO_MARKETPARTICIPANT.IDENTIFICATION are respectively:
- o 16 alphanumeric characters – for the TSO identification;
- o "305" – for the coding scheme.

Proposed change No. A.5.3
Gas nominations – NOMINATIONMONITORING schema

The Agency proposes an alignment in the namespace of gas nomination monitoring schema with the namespace of the rest of the Edig@s schemas. This means that the current format of the Nomination Monitoring schema namespace:
urn:easee-gas.eu:edigas:remit:nominationmonitoringdocument:5:1
changes to:
urn:easeegas.eu:edigas:remit:nominationmonitoringdocument:5:1

Reason for the change
A proposal for the alignment in order to harmonise the naming approach of the same family of schemas.

Bulgartransgaz's view

We do not object to the proposed change.
However, we would like to point out that after the change of the namespace, the old files will no longer be valid under the new schema and could not be proceeded with it. This would mean that after the transition period (of parallel use of both schemas – old and new), if an update/modification is needed of fundamental data reported before the schema modification with the old namespace, this shall be done by submission of the updated information for the old report in an XML document based on the new schema with the new namespace.
We would suggest to the Agency to provide clear guidance of the procedures for update of old reports after schema change and its namespace modification.

Proposed change No. A.5.4
Gas nominations – NOMINATIONMONITORING schema

The Agency proposes to remove the ZSO code as an identifier in the code schema of gas nomination monitoring schema and to add the codes from the REMIT Implementing regulation. Currently, the schema uses the following three codes for the identification of market participants/TSO/shipper:
- The code "305" for an EIC party code.
- The code "A01" for an ACER code.
- The code "ZSO" for a TSO managed code.

Thus, the following values would be allowed for the identification:

- the code "A01" for an ACER code,
- the code "LEI" for Legal Identifier Entity,
- the code "GLN/GS1" or Global Location Number,
- the code "BIC" for Bank Identifier Code,
- the code "305" representing an EIC code.

Reason for the change
ZSO will be removed since the Agency does not have access to the ZSO register and cannot identify the parties. The Agency therefore proposes to use the codes from the Implementing Regulation No. 1348/2014, which, in addition to the ACER and EIC code, permits Legal Entity Identifier (LEI), Bank Identifier Code (BIC), Energy Identification Code (EIC), Global Location Number (GLN/GS1).
Impacted attributes are:

INTERNAL_MARKETPARTICIPANT.IDENTIFICATION
ISSUER_MARKETPARTICIPANT.IDENTIFICATION
RECIPIENT_MARKETPARTICIPANT.IDENTIFICATION
RESPONSIBLETSO_MARKETPARTICIPANT.IDENTIFICATION
INTERNALACCOUNT
INTERNALACCOUNTTSO
EXTERNAL ACCOUNT
EXTERNAL ACCOUNTTSO
ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE
RECIPIENT_MARKETPARTICIPANT.MARKETROLE.CODE

Bulgartransgaz's view

We support the proposal **for extending the scope of acceptable values** for identification and coding schemes for the attributes:

- o INTERNAL_MARKETPARTICIPANT.IDENTIFICATION
- o ISSUER_MARKETPARTICIPANT.IDENTIFICATION
- o RECIPIENT_MARKETPARTICIPANT.IDENTIFICATION
- o RESPONSIBLETSO_MARKETPARTICIPANT.IDENTIFICATION
- o INTERNALACCOUNT
- o INTERNALACCOUNTTSO
- o EXTERNAL ACCOUNT
- o EXTERNAL ACCOUNTTSO
- o ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE
- o RECIPIENT_MARKETPARTICIPANT.MARKETROLE.CODE

We **do not support the suggestion "*to remove the ZSO code as an identifier in the code schema of gas nomination monitoring schema*"** for the following reasons:

1. The impacted from the change attributes are not clearly defined.

2. Currently the following elements allow "ZSO" as acceptable value or coding scheme:
   - o **ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE**
   - o INTERNAL_MARKETPARTICIPANT.IDENTIFICATION
   - o INTERNALACCOUNT
   - o EXTERNALACCOUNT

   When the TSO is generating the report the ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE shall be "ZSO", and thus the proposed change is inappropriate regarding this attribute of the NOMINATIONMONITORING schema.

Proposed change No. A.5.5
Gas nominations – NOMINATIONMONITORING schema

The Agency noticed the typographical error in the schema relation between gas direction and timeseries (RULES GOVERNING THE TIMESERIES CLASS) which is incorrectly referenced in the schema as timseries.

Reason for the change
The correction of the typographical error in the word timeseries that has been referred to as "timseries", with the letter e missing after tim.

Bulgartransgaz's view

We support the proposed change and the reasoning behind it.

Proposed change No. A.5.8
Gas Storage data

The Agency proposes that in the REMITStorageSchema, storageFacilityReport the additional value"**GRP" ("Storage group)"** is inserted among acceptable values for the "storageType" field.

Reason for the change
Each of the currently listed permitted storage types (DSR) (ASR) (ASF) (SGL) (PPC) (GHT) (SRC) cover only the identification of an individual storage facility. These cannot be used for the identification of a storage group. A storage group can be composed as a mix of different types of storage facilities. An example is a storage group called 'Basic underground storage' and is composed of three storage facilities that are grouped: Yela = Aquifer (ASR) + Marismas = depleted field (DSR) + Serrablo = depleted field (DSR). In order to be able to complete this field appropriately and identify storage group datasets the Agency proposes to introduce an additional storage type "GRP" (= Storage Group).

Bulgartransgaz's view

We support proposals for extending the scope of acceptable values for existing schema attributes.

We support the proposed change and the reasoning behind it.

We consider that the introduction of a code for identification of the storage groups will facilitate the reporting process and is in line with the requirements of Regulation (EU) No 1348/2014: "*Storage system operators as defined in Article 2(10) of Directive 2009/73/EC shall report to the Agency and, at their request, to national regulatory authorities for each storage facility or,* **where facilities operated in groups, for each group of storage facilities** *following information through a joint platform*".

A6. FEEDBACK ON THE PROPOSED CHANGES TO INSIDE INFORMATION REPORTING

Proposed change No. A.6.1
UMM schema №2 "Unavailabilities of gas facilities"

The Agency proposes to change Field No (16) Affected Asset or Unit of the UMM schema №2 "Unavailabilities of gas facility in a way that all assets or/and units affected by an outage or unplanned maintenance **(a single event affecting multiple assets in the same way i.e. same timing)** can be published within a single report.
The Unavailability report will contain a repeatable set of data fields that identify the affected asset or unit, the balancing zone to which it belongs to and the details of technical, available and unavailable capacity during the period of outage or unplanned maintenance.

Reason for the change
Currently, the UMM schema №2 "Unavailabilities of gas facilities" allows market participants to announce an interruption event for one single asset or unit per message which makes it impossible to report multiple affected assets within one report. As it often happens during a period of outage or unplanned maintenance that many assets and/or units are affected TSOs have to publish consequences of the same event in multiple reports; which is cumbersome and might cause inconsistency.
An improvement of the REMIT data quality and a simplification of the reporting approach.

Bulgartransgaz's view

We support the proposed change and the reasoning behind it.

We think that the change would be useful and beneficial, both for the TSOs with regards to the publication process and for the market with regards to the clarity of the provided information on the scope and the influence of the outage event, if information for all affected assets or units during an unavailability event could be published in a single UMM.

We would like to point out that if the relevant change would be applied in the electronic schema for collection of information for "Unavailabilities of gas facilities", the relevant publication format of the UMMs shall be adapted accordingly.

Practical example for an event impacting several assets or units:

Recently, we experienced an event for planned maintenance that affected 16 domestic exit points and led to 100% unavailability of their capacity. After internal discussions, we decided that it would be confusing for the market if we announce the interruption of each point via separate UMM message. To avoid misinterpretation at market participants side regarding the reason for the simultaneous unavailability of all points, we disclosed information for the event through a single message in UMM format №3 "Other market information". In this particular case, this was possible because the unavailability of all affected points was equal to 100%.
https://bulgartransgaz.bg/en/news/vajno_saobshtenie_za_pazara-330-c31.html

For the cases when an event affects many points but the impact is different (with partial limitations of the available capacities), it would be useful if the UMM format and the relevant Schema №2 allow us to specify the unavailable and the remaining available capacity for each of the affected points.

Proposed change No. A.6.2
UMM schema №2 "Unavailabilities of gas facilities"

The Agency proposes to change the accepted values of the Data Field (8b) Unit of measurement and to add a new unit "GWh/h" and remove the existing unit "mcm/d".
Thus, the allowed units for gas UMMs will be: kWh/d, kWh/h, GWh/h, GWh, GWh/d, TWh.

Reason for the change
An alignment of units of measurement used for the reporting of gas storage and inside information will allow for consistent and unified reporting of data.

Bulgartransgaz's view

We **support proposals for extending the scope of acceptable values for existing schema attributes and thus the suggested change to allow "GWh/h"** as new allowed value for the Data Field (8b) "Unit of measurement".

We **do not support the proposal and the reasoning behind it to remove "mcm/d" from the list of allowed values** for the Data Field (8b) "Unit of measurement".

"mcm/d" is a valid unit for REMITTable 1, REMITTable 2. Furthermore, GASCAPACITYALLOCATIONS and NOMINATIONMONITORING schemas also allow the usage of unit for "million cubic meters per day".
With this regard, we think that from analysis and data matching perspective it would be reasonable to keep "mcm/d" as acceptable value for the Data Field (8b) "Unit of measurement".

Regarding the proposed reasoning for the change, we would like to state that the unavailabilities of the storage facilities are not the only cases that fall into the scope of events that shall be disclosed by the usage of UMM schema №2 "Unavailabilities of gas facilities". Thus, the effect from the alignment of the allowed units for the UMM Schema No 2 with those from the Gas Storage report would not be beneficial for all market participants and reporting parties.

Proposed change No. A.6.3
UMM schema №2 "Unavailabilities of gas facilities"

The Agency proposes to introduce the new accepted value "Storage facility unavailability" among the list of accepted values in the Data Field No (4/b) Type of Event.

Reason for the change
The current schema does not allow reporting the unavailability of the whole gas storage facility with just one UMM report. In order to report the unavailability of the whole gas storage facility market participants have to report three UMM reports: one UMM report with the Type of Event "Storage unavailability", one UMM report with the Type of Event "Injection unavailability" and one UMM report with the Type of Event "Withdrawal unavailability". The proposal limits the number of UMMs that market participants have to publish.

Bulgartransgaz's view

We support proposals for extending the scope of acceptable values for existing schema attributes.

Regarding the particular suggestion, we would do not fully understand the difference between "Storage unavailability" and "Storage facility unavailability".
If the modification will be approved, we would like to suggest to the Agency to provide clear guidance in the ACER MOP regarding:
- o Which events shall be defined as "Storage unavailability" and which – as "Storage facility unavailability"; and
- o In which cases each of the event types shall be used: "Storage facility unavailability", "Storage unavailability", "Injection unavailability", "Withdrawal unavailability".

A7. FEEDBACK ON THE PROPOSED MISCELLANEOUS CHANGES APPLICABLE TO MORE THAN ONE DATA TYPE

Proposed change No. A.7.1
REMITTable 1 and REMITTable 2

The Agency proposes that all fields related to "datetime/timestamps" in Table 1 and Table 2 schemas only allow four digits for the year.

Reason for the change
An alignment of the format of year reporting with the stored data in the Oracle database.

Bulgartransgaz's view

We support the proposal that all fields related to "datetime/timestamps" should only allow four digits for the year.

However, we would like to point out that this is already the case for the current electronic formats for REMITTable 1 and REMITTable 2, because all fields use the standard XSD types "date" and "dateTime" which already enforce strictly four digits for the year.

Reference: https://www.w3schools.com/xml/schema_dtypes_date.asp

Proposed change No. A.7.2
REMITTable 1 and REMITTable 2

The Agency proposes that each element of the type "datetime" in Table 1 and Table 2 schemas includes an enforcement of the applicable pattern in regard to the local time zone. No time zone offset or zoned time (with offset) is required.

Reason for the change
The alignment of the format of "datetime" across the REMIT reporting schemas would ensure more clarity than just a stipulation in the guidelines that the reported time should refer to the certain time zone.

Bulgartransgaz's view

We would accept such enforcement for the schema formats REMITTable 1 and REMITTable 2
but would like to point out that the change would lead to unalignment of the date and time expression in the concerned schemas with the rest of the REMIT electronic formats, because currently:
- The date and time fields of GASCAPACITYALLOCATIONS, NOMINATIONMONITORING, CONTRACTMARKETMONITORING schemas require expression of the time in UTC;
- The date and time fields of the three UMM schemas require expression of the time in UTC, as well.

This means that if the change would be proceeded for REMITTable 1 and REMITTable 2, in case of linking and matching with the ARIS data from the other reporting schemas (GASCAPACITYALLOCATIONS, NOMINATIONMONITORING, UMMs) during the REMIT data analysis, this non-alignment of the time values shall be taken into account.

Notwithstanding, we consider that using local time for the "date and time" elements of the three UMM schemas (Publication date and time, Event start and Event stop) would be very beneficial for the market participants that follow the information for the events of unavailability of assets from the local markets, published on local platforms/web-sites.

Proposed change No. A.7.3
REMITTable 1 and REMITTable 2

The Agency proposes that default values in mandatory fields are removed from the schemas. The schemas will have empty mandatory fields and reporting parties will have to fill the mandatory fields with a valid value in order to comply with the schema.

Reason for the change
This would prevent reporting parties from unintentionally reporting default valid values.

Bulgartransgaz's view

We support this change and the reasoning behind it.

Furthermore, to facilitate the usage of the schemas and the proper implementation of their modifications, those predefined default attribute values could be integrated as comments in the XSD.

Practical example:

Current setup with default values of the mandatory fields:

<xs:element name="settlementMethod" type="ait1:settlementMethodType" **default="P"***>*

Suggestion for modified XSD with sample value for the mandatory fields, included in the schema as a comment:

<xs:element name="settlementMethod" type="ait1:settlementMethodType"> **<!-- Sample value: "P" -->**

Proposed change No. A.7.4
REMITTable 1 and REMITTable 2

The Agency proposes that the UTI type in Table 1 and Contract ID in Table 2 schemas does not allow the use of space characters.

Reason for the change
A space within an identifier can cause issues and should not be allowed.

Bulgartransgaz's view

We support this change and the reasoning behind it, as long as some delimiters like **underscore** ("_") are still allowed in the relevant attributes: UniqueTransactionID and ContractID.

We would like to point out that this change is not implemented in the new electronic formats REMITTable1_V3.xsd proposed for consultation:

Extract from REMITTable1_V3.xsd:

```
<xs:simpleType name="uniqueTransactionIdentifierType">
        <xs:restriction base="xs:string">
            <xs:maxLength value="100"/>
            <xs:pattern value="[A-Za-z0-9_ ]+"/>
        </xs:restriction>
</xs:simpleType>
```

There is an interval here.

Proposed change No. A.7.5
REMITTable 1 and REMITTable 2

The Agency proposes that the present pattern of the element "Extra" in Table 1 and Table 2 schema is changed to "\w+==((\d+\.\d+)|(\d+)|(\w+))(;\w+==((\d+\.\d+)|(\d+)|(\w+)))*"
allowing the reporting of only one pair and not two pairs, as is presently required.

Reason for the change
The reduction of the restriction to one pair and the simplification of the use of the field "Extra".

Bulgartransgaz's view

We do not object to this change as it only extends the set of acceptable values for the field "Extra".

We would like to point out that this change is not implemented in the new electronic formats REMITTable1_V3.xsd and REMITTable2_V2.xsd proposed for consultation.

Proposed change No. A.7.6
All data types (where relevant)

The Agency proposes that all mandatory schema elements that are of type string and have only maximal length defined have also minimal length=1.

Reason for the change
Following a good practice of the XML element/attribute definition.

Bulgartransgaz's view

We support this change and the reasoning behind it.

We would like to point out that currently this rule is not implemented in the new electronic formats for REMITTable3_V1.xsd and REMITTable4_V1.xsd, proposed for consultation.

Proposed change No. A.7.7
All data types (where relevant)

The Agency consults on the approach to introduce validation rules on mandatory fields, where appropriate, see some examples in the Reason for the change below.

Reason for the change
As examples, it is expected that the elements
"Rights_MarketDocument/mRID", "Rights_MarketDocument/TimeSeries/mRID", "PartyID" in Table 3

"GasCapacityAllocations_Document/identification",
"GasCapacityAllocations_Document/process_Transaction.identification",
"GasCapacityAllocations_Document/Transportation_Transaction/identification" in Table 4

"lngFacilityOperatorIdentifier", "ParticipantType" in REMIT LNG data reporting

with mandatory cardinality also have an appropriate value.
This change would therefore enhance data quality for monitoring purposes.

Bulgartransgaz's view

We understand the proposal as an information that technical/business validation rules for the data processing at ARIS side will be implemented and that this suggestion does not represent particular proposal for change of the REMIT XSD structures and their attributes.

We would suggest to the Agency to discuss the proposals for new validation rules with the relevant stakeholders and ACER REMIT user groups, depending of the concerned schema (ENTSOG and the gas TSOs, ENTSO-E and the electricity TSOs, GIE and the SSOs and LSOs, AEMP roundtable, RRM user group and etc.).

Proposed change No. A.7.8
LNG and Gas Storage data

The Agency proposes to introduce into the LNG and Gas Storage schemas the same lifecycle mechanism that exists in REMIT Table1 and REMIT Table2 allowing for corrections, modifications and cancelations of previously reported records. Thus, the field for Action type will have the following possible values:
- New
- Modify
- Error
- Cancel.

Reason for the change
Currently, it is not possible to update or to cancel the submitted LNG or GAS STORAGE files. The same lifecycle mechanism as for REMIT Table1 and REMIT Table2 will be applied.

Bulgartransgaz's view

We would support the introduction of a lifecycle mechanism for the LNG and Gas Storage schemas but would suggest from the Agency clear guidance in the ACER REMIT MOP for the cases when the different values of the new "Action type" attribute shall be used.

Proposed change No. A.7.9
LNG and Gas Storage data

The Agency proposes to align the units of measurement in the REMIT Storage and REMIT LNG schemas with the units for gas UMM reporting.
Current restrictions for REMIT Storage and REMIT LNG schema:

cm, cm/d, mcm, mcm/d, kWh, kWh/h, kWh/d, GW, GWh, GWh/h, GWh/d, MW, MWh, MWh/h, MWh/d, TWh, Therm/d, kTherm/d, MTherm/d, Therm, kTherm, MTherm, %.

The proposal is to limit the restrictions to
kWh/d, kWh/h, GWh/d, GWh, TWh, GWh/h.

Reason for the change
The alignment of units of measurement in REMIT Storage and LNG schemas with the units for UMM reporting will allow consistent and unified reporting.

Bulgartransgaz's view

We do not support this change because it limits the list of the allowed values for the unit attributes in the concerned XSDs.

Furthermore, we would like to point out that currently
the scope of acceptable units allowed for data submission from the SSOs to AGSI+ (used as joint platform for storage data reporting to ARIS) is wider than the one currently allowed in the Gas Storage data report and UMM schemas:

- o Allowed units for data submission SSO **->** AGSI+:
  cm","cm/d","mcm","mcm/d","kWh","kWh/h","kWh/d","GW","GWh","GWh/h","GWh/d", "MW","MWh","MWh/h","MWh/d","TWh","Therm/d","kTherm/d","MTherm/d","Therm","k Therm","MTherm","%","10^3 m3 LNG","10^6 m3 NG"

- o Currently allowed units for reporting from AGSI+ **->** ARIS:
  cm, cm/d, mcm, mcm/d, kWh, kWh/h, kWh/d, GW, GWh, GWh/h, GWh/d, MW, MWh, MWh/h, MWh/d, TWh, Therm/d, kTherm/d, MTherm/d, Therm, kTherm, MTherm, %

In our view, any further limitations in the scope of acceptable units for the Gas Storage data report may cause issues with the data reporting from AGSI+ to ARIS, since AGSI+ accepts data in wider variety of units from the storage operators.

Proposed change No. A.8.1
LNG and Gas Storage data

The Agency proposes that storage and LNG facilities (fields "storageFacilityIdentifier" and "lngFacilityIdentifier") are identified with EIC W and Z codes only. Currently, the schema allows the identification of facilities also with ACER and LEI codes. ACER and LEI identifiers should be removed from the facility identifiers.

Reason for the change
ACER and LEI identifiers should be removed because their purpose is to identify Market Participants and not assets.

Bulgartransgaz's view

We support the proposed change and the reasoning behind it.

Furtherore, we would like to point out that according to the rules defined by ENTSO-E (as CIO for EICs) in The EIC SCHEME REFERENCE MANUAL - resource objects (e.g: generation unit, production unit, LNG terminals, **gas storages** etc.) shall be identified through EIC Type W: "*The EIC code of type W is used to identify objects to be used for production, consumption or storage of energy. Examples are: generation unit, production unit, LNG terminals, gas storages etc. Excluded are the passive elements in the grid, e.g. lines or transformers.*

EIC object type Z (Measurement point)
The EIC code of type Z is used to identify a physical or logical point that is used to identify an object where the measurement of energy is measured or calculated."

Regarding this we consider that:
- o EIC codes of type W – are the proper type for identification of gas storage facilities or group of gas storage facilities;
- o EIC code of type Z - are the proper type for identification of measurement/connection points. Thus, with Z type EIC could be identified the connection point between the storage facility and the gas transmission system but not the storage facility itself.

Proposed change No. A.8.2
Inside information

The Agency proposes to introduce two new elements "intervalStart" and "intervalStop" into the complex type "capacity" and make the complex type repeatable. The change is applicable to both gas and electricity UMM schema.

Reason for the change
Currently, the UMM schema allows only for one outage value per defined time period. If the available/unavailable capacity fluctuates over time market participants have to publish every change of available/unavailable capacity in a separate UMM even if the outage values and affected time periods were known in advance. Several Inside Information Platforms have implemented a way to publish this information as if it were one UMM, but these values and time slots must be split in the 'back end'.
This would be a significant change, not only on the technical implementation side. For this reason, the Agency would like to receive opinion whether such a change would be welcomed by Inside Information Platforms. The Agency also welcomes views on whether this change should be applied to only one type of UMMs (gas or electricity) or both.

Notwithstanding the challenges, the benefit to the market would be easier reporting and potentially fewer revisions or updates to UMMs for these kinds of outages.

Bulgartransgaz's view

Our concerns regarding the proposed change A.8.2 are as following:

If change No A.6.1. would be proceeded, allowing the publication of information, for the available/unavailable/technical capacity, for more than one asset during particular event of unavailability, then the implementation of change No A.8.2 would introduce additional complexity to the message, especially when more facilities/units are concerned and there are fluctuations of capacities during the time of the event.

The implementation of both changes (A.6.1. and A.8.2.) would allow the processing of all the needed information and its publication in a single message for particular event. This would be beneficial and comprehensive in the simple cases when:
   o   One single unit is affected with or without fluctuations of its capacity during the event; or
   o   Many points/facilities are affected with no fluctuations of the capacity during the event period.

For the most sophisticated cases, when the affected assets are more than one and their available/unavailable capacities vary during the event period, the change would introduce the following negative consequences:
   o   Complicated publication;
   o   Complex maintenance and update of the content of the published UMM messages (inclusion/exclusion of affected points, profiling of the affected capacities);
   o   Potential difficulties for interpretation and understanding of the message content from market point of view.
In such complex situations, we would prefer:
   o   To publish separate UMM for each point, affected by an event, with information for the fluctuations of the capacities per point/UMM message.
       This will facilitate the publication process and will allow the market participants to easily follow only the events for point(s) that concern them and to avoid confusion with additional information for points out of the scope of their business and interest.

       Practical example (*of an event affecting several points with fluctuations of the capacity during the event period – 5 UMMs published for each of the 5 affected points*):
       https://bulgartransgaz.bg/en/news/saobshtenie_za_vremenno_ogranichavane_na_prenosen_kapacitet-326-c31.html
       https://bulgartransgaz.bg/en/news/saobshtenie_za_vremenno_ogranichavane_na_prenosen_kapacitet-327-c31.html
       https://bulgartransgaz.bg/en/news/saobshtenie_za_vremenno_ogranichavane_na_prenosen_kapac

https://bulgartransgaz.bg/en/news/saobshtenie_za_vremenno_ogranichavane_na_prenosen_kapacitet-325-c31.html
https://bulgartransgaz.bg/en/news/saobshtenie_za_vremenno_ogranichavane_na_prenosen_kapacitet-324-c31.html
https://bulgartransgaz.bg/en/news/saobshtenie_za_vremenno_ogranichavane_na_prenosen_kapacitet-322-c31.html

or
- To use and publish information via UMM Schema No 3 format "Other market information".

Furthermore, we would like to express our view regarding the proposed change of UMM Schema No2 "Unavailabilities of gas facilities" and its potential implementation:
- We consider that the new elements "intervalStart", "intervalStop" could be introduced only for the attributes "Unavailable Capacity" (Data field No (9)) and "Available Capacity" (Data field No(10));
- We do not consider reasonable to introduce the new elements "intervalStart", "intervalStop" for the attribute "Technical capacity" (Data field No (11/b)) because the technical capacity remains unchanged during the events of unavailability and serves only to show the value of the maximum firm capacity that the transmission system operator offers to the market.

Proposed change No. A.8.3
Inside information

The Agency proposes to change the Data Field No (17) Affected Asset or Unit EIC Code from optional to mandatory.

Reason for the Change
These EIC codes will help the Agency link affected assets or unit to the market participant(s) and fundamental data received.

Bulgartransgaz's view

We do not support the proposed change and the reasoning behind it.

We think that the change may impose limitations for inside information disclosure in the cases when the affected assets or units do not have EIC code. As a consequence, this will hamper the REMIT data collection process, will not allow the relevant market participant to fulfil its disclosure obligations under Article 4 (1) of Regulation (EU) No 1227/2011 and last but not least – will bereave the market from valuable information for event(s) of unavailability.

In our view, the REMIT schema changes shall facilitate the reporting process which will naturally lead to improved data quality and completeness. Regarding this, we think that the modification of any XSD element's cardinality from optional to mandatory may impose obstructions to the reporting process by making the data submission/reporting impossible in case of absence of the relevant information at market participant side.

Our arguments against the suggested modification of the Data field "Affected Asset or Unit EIC Code" of the UMM Schema No2 "Unavailabilities of gas facilities" and the proposed reasoning: *"to help the Agency link affected assets or unit to the market participant(s) and fundamental data received"*
are based on the following:

- Information for the Market participant name (Data field No (18)) and Market participant EIC (Data field No (19)) is already available in the UMM message together with the name of the Affected asset or unit (Data field No (17)), so the linking between the affected asset and the relevant market participant is carried out within the message.

- Not all objects of the gas infrastructure have EIC codes.
  Only the company as legal entity, connection points, balancing zones, storage and LNG facilities

and some information systems could be identified with EIC codes.

Assets like pipeline sections, linear valves, pressure reduction stations and etc. are not identified with EIC codes.

If the attribute "Affected Asset or Unit EIC Code" of the UMM Schema No2 "Unavailabilities of gas facilities" become mandatory, events related to the unavailability of those assets could not be disclosed.

- o Furthermore, we think that the received though UMMs inside information could not be always linked/matched with the collected fundamental data at ARIS, based on information for the Affected asset or unit (name, EIC or other identification), due to the fact that the scope of the facilities for which inside information shall be disclosed is much bigger that the one for which fundamental data is reported. Please consider the following clarification:

  Inside information shall be disclosed by all market participants for all "*facilities which the market participant concerned, or its parent undertaking or related undertaking, owns or controls or is responsible…Such disclosure shall include information relevant to the capacity and use of facilities for production, storage, consumption or transmission of electricity or natural gas or related to the capacity and use of LNG facilities*".

  At the same time, fundamental data is reported only by/for the TSOs, SSOs and LSOs.

  Thus, the scopes of assets for which information is received at ARIS from the channel for Inside information collection and from the channel for fundamental data do not overlap by default, based on Regulation requirements, and the "linking" of the different data sets at ARIS could be always realized.

- o The Gas TSOs report fundamental data (nominations, renominations, allocations) for the interconnection points, entry points of production facilities including of upstream pipelines, entry and exit points to and from storage and LNG facilities, for physical and virtual hubs, and for the exit points to single customers with capacity to consume more than 600 GWH/y, in line with the requirements of Article 9(2) of REMIT Implementing Acts..

  This do not cover all points and assets of the transmission system but at the same time UMMs shall be published for all "*facilities which the market participant concerned, or its parent undertaking or related undertaking, owns or controls or is responsible*".

- o The aggregated fundamental data reported by ENTSOG Transparency Platform to ARIS concerns only the Relevant points (as per the definition and the requirements of Annex I of Regulation (EC) № 715/2009).

  This do not cover all points of the transmission system but at the same time UMMs shall be published for all "*facilities which the market participant concerned, or its parent undertaking or related undertaking, owns or controls or is responsible*".

With regards to the mentioned above, we are on the opinion that the change will impose significant limitations to the possibilities of the market participants to disclose important inside information and at the same time will not improve notably the possibilities of the "Agency to link the affected assets or unit to the received fundamental data".

A8. ADDITIONAL CHANGES AND COMMENTS PROPOSED BY BULGARTRANSGAZ

Data type	UMM Schema No2 "Unavailabilities of gas facilities"

Impacted field(s)	UMM Schema No2 "Unavailabilities of gas facilities", Data field No (16) "Affected asset or unit name"
	
	 New attribute named "**Direction code**" to be introduced as a sub-field of the Data field No (16) "Affected asset or unit name", with the following properties:
	
	    ○ Applicability: optional
	
	    ○ Possible values: entry, exit
	
	    ○ Type: alphanumeric characters

Description of your change proposal/Other comment	**Additional change/comment No BTG 1:**
	
	 In order to facilitate the proper data reporting and information disclosure - the provision of exhaustive enough and fully correct information to the market about the unavailablities of gas facilities, we are proposing a new schema attribute to be introduced, named "**Direction code**".
	
	 Purpose of the field:
	 - To identify how the energy flow is seen from the perspective of the market participant that is disclosing the interruption information;
	
	 Properties of the field:
	 - "Direction code" to be a sub-field of "Affected asset or unit name" attribute;
	 - **Applicability: Optional**, because not all gas facilities have direction:
	    ○ The Storage facilities, LNT terminals, Compressor stations do not have direction;
	    ○ Connection points have direction: entry only, exit only or entry/exit;
	 - **Possible values:** The attribute should have 2 possible values:
	    ○ Entry (or special coding for the Entry direction, i.e. Edig@s code: Z02);
	    ○ Exit (or special coding for the Exit direction, i.e. Edig@s code: Z03)
	 - **Type**: alphanumeric characters.

Motivation for the change	Currently UMM Schema No2 "Unavailabilities of gas facilities" does not have an attribute for flow direction. In case that the Affected asset or unit is a connection point (interconnection point, cross-border point, connection point between transmission system operator and storage facility and so on), it could be bidirectional (entry/exit point). The point capacity is direction dependent, respectively the values of the UMM Schema No2 attributes: Technical capacity, Available capacity and Unavailable capacity depend on the point direction. In summary, the technical, available and booked capacities in normal circumstances are different for the different point direction. This means that during an event of unavailability both sites of a point could be affected and respectively - the affected capacities are different per point direction. In the answer of Question 4.1.10 from "ACER FAQs on REMIT fundamental data and inside information collection" the Agency is proposing workaround of the issues related to the disclosure of inside information for bidirectional points. The proposed

workaround suggests the usage of the Balancing zones information in specific order for specifying the flow direction.

We believe that this workaround solution serves the purposes of the data collection but has disadvantages from data users/network users/market participants point of view regarding its clarity and intuitiveness. In our view, the information required by Article 4 (1) of REMIT is dedicated mainly to inform the market for current or future unavailabilities and this is the reason why it shall be presented on clear, simple and easy understandable manner. Regarding this, we are suggesting the usage of a special attribute for denotation of the energy flow direction which will bring straightforwardly the relevant information to the stakeholders and users of the affected facilities.

Data type	UMM Schema No3 "Other market information" UMM Schema No2 "Unavailabilities of gas facilities"
Impacted field(s)	Data field No (13) "Remark", regarding the maximum length/number of allowed alphanumeric characters
Description of your change proposal/Other comment	**Additional change/comment No BTG 2:** We would like to suggest to extend the maximum length/number of alphanumeric characters allowed for Data field No (13) "Remark" from 500 to 1000. Recently, we experienced several important events that we should disclose though the application of UMM type "Other market information". The details and the description of the events exceeded 500 characters. In our view, the information required by Article 4 (1) of REMIT and thus the UMMs are dedicated mainly to inform the market for current or future unavailabilities and this is the reason why their content shall be clear, simple, easy understandable and exhaustive to the extent possible. **Practical example:** Here we provide examples of UMM messages for real events whose description exceeded 500 characters: https://bulgartransgaz.bg/en/news/vajno_saobshtenie_za_pazara-330-c31.html https://bulgartransgaz.bg/en/news/urgent_market_message-335-c31.html
Motivation for the change	Currently Data field No (13) "Remark" of UMM Schema No3 "Other market information" allows maximum 500 alphanumeric characters. This message type shall be used in specific cases and its structure is a basic one with limited set of attributes. To be able to provide as exhaustive as possible information to the market through messages based on Schema No3 "Other market information", we suggest to extend the maximum length/number of alphanumeric characters allowed for Data field No (13) "Remark" from 500 to 1000. Furthermore, to align the format of Data field No (13) "Remark" among the UMM schemas, we would like to suggest to extend the maximum length/number of alphanumeric characters allowed for Data field No (13) "Remark" from 500 to 1000, not only for UMM type "Other market information" but also for Schema No 2

"Unavailabilities of gas facilities".

We believe that the possibility to provide as much as possible details to the market through the UMM "Remark" fields for events requiring disclosure of inside information and explain the relevant circumstances with regards to the possible impact on wholesale energy prices would be beneficial for all market participants and will facilitate the publication process of the disclosing party.

Data type	REMITTable 4 – GASCAPACITYALLOCATIONS Schema
Impacted field(s)	PROCESS_TRANSACTION.TYPE, TRUM field 9 The type identifies the nature of transportation transaction to be reported in accordance with current applicable industry standards as specified by gas network code on Interoperability and data exchange.
Description of your change proposal/Other comment	The attribute is dedicated to identify the type of the applied allocation process of the reported transportation transaction. Currently, the allowed values of the attribute **PROCESS_TRANSACTION.TYPE** of GASCAPACITYALLOCATIONS Schema are: ZSW = Ascending clock auction ZSX = Uniform price auction ZSY = First come first served ZSZ = Secondary market procedure **Additional change/comment No BTG 3**: Additional values to be allowed for the attribute **PROCESS_TRANSACTION.TYPE** that will permit proper and accurate identification of the applied capacity allocation process: XXY* = Pro-rata XYZ* = Over-nomination YZX* = Open Subscription Window ZXX* = Open season YXX* = Storage allocation XXZ* = Non-ascending clock pay-as-bid auction XXY* = Conversion mechanism XZY* = Other process (to be used when the applied allocation process cannot be identified with any of the allowed values of the attribute due to non-exhaustiveness of the list of the allowed attribute values and identified processes) *Appropriate codes musty be proposed by the Agency/Edig@s for each of the processes.* Properties of the additional values: - The maximum length of this information is 3 alphanumeric characters

	- In case of "Other process" type, the maximum length of this information is 50 alphanumeric characters. **Practical example:** The capacity of all domestic points of Bulgartransgaz is allocated via Pro-rata allocation procedures. The GASCAPACITYALLOCATIONS Schema does not allow us to identify properly the used allocation process and we submit the relevant reports to ARIS by using the arbitrary code "ZSY" for the **PROCESS_TRANSACTION.TYPE**, as suggested by the Agency in the answer of Question 4.2.18 of "ACER FAQs of REMIT transactions reporting" document.
Motivation for the change	Currently, the allowed values of the attribute **PROCESS_TRANSACTION.TYPE** of GASCAPACITYALLOCATIONS Schema are: ZSW = Ascending clock auction ZSX = Uniform price auction ZSY = First come first served ZSZ = Secondary market procedure Processes like the listed below cannot be properly identified: ○ Pro-rata ○ Over-nomination ○ Open Subscription Window ○ Open season ○ Storage allocation ○ Non-ascending clock pay-as-bid auction ○ Conversion mechanism ○ And other processes not mentioned here To allow proper and accurate identification of the applied capacity allocation process we suggest extension of the list of acceptable values for the attribute **PROCESS_TRANSACTION.TYPE.** With the aim to avoid future schema changes due to non-exhaustiveness of the list of the allowed attribute values and identified processes, we are suggesting "Other process" type to be allowed with acceptable value of free text with maximum length of 50 alphanumeric characters. In the answer of Question 4.2.18 from Question 4.2.18 of "ACER FAQs of REMIT transactions reporting documents" the Agency is proposing workaround of the issues imposed by the current limitations of the allowed values for the attribute. The workaround suggests the usage of the "ZSY" as arbitrary value for the identification of the missing processes. We believe that this workaround solution limits the observation possibilities of the Agency and the NRAs, and that precise information for the applied allocation process is important. A prove for this is the intention of the Agency to introduce a validation rule for this schema attribute (please refer to Proposed change No A7.7, suggesting the application of validation rule for the: "GASCAPACITYALLOCATIONS_Document/process_Transaction.identification"). This is the reason why we are suggesting extension of the list of values allowed for the attribute **PROCESS_TRANSACTION.TYPE** that will permit proper and accurate identification of the applied capacity allocation process.

Data type	All schemas and data types that will be modified
Impacted field(s)	All relevant schema elements
Description of your change proposal/Other comment	**Additional change/comment No BTG 4:** Bulgartransgaz considers important to recommend to the Agency that the market should be given at least 12 months for implementation of any schema changes, after the official announcement of the decided modifications.
Motivation for the change	The term of 12 months will allow the affected parties (MPs and reporting entities) to do a proper planning and allocation of resources for smooth implementation of the needed changes in the relevant systems supporting the REMIT processes.

Data type	All schemas and data types that will be modified
Impacted field(s)	All relevant schema elements
Description of your change proposal/Other comment	**Additional change/comment No BTG 5:** Bulgartransgaz considers important to suggest to the Agency: ○ To issue clear guidance on the terms of validity of the currently used schemas; ○ To define rules that have to be followed during the "transition period" (of simultaneous usage of the current and the new schemas) for update/modification/cancelation of reports submitted to ARIS before the date of Go-life of the new schemas with the currently used ("old") schemas; ○ To define rules that have to be followed after the "transition period" (of simultaneous usage of the current and the new schemas) for update/modification/cancelation of reports submitted to ARIS before the date of Go-life of the new schemas with the currently used ("old") schemas; ○ Update accordingly all documents (ACER REMIT TRUM, MOP, FAQs, Q&A, Guidances, XML samples and etc.) with information relevant to the new or modified schema(s) and schema elements, and the rules and requirements for their usage; ○ Update accordingly all documents (ACER REMIT TRUM, MOP, FAQs, Q&A, Guidances and etc.) with information relevant to the validity and applicability of the currently suggested and used workarounds of issues that would be resolved through the modified schemas (e.g.: the usage of arbitrary values for some mandatory fields and etc.).
Motivation for the change	We believe that the clear and exhaustive documentation is an important precondition for the proper implementation of the needed changes. It will ensure better understanding of the REMIT requirements and Agency's rules and will facilitate the improvement of the reporting process and its data quality.