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

| |
|---|
| **Proposed change No. A.4.1** |
| **Respondent's view ∗**
The proposal for introduction of a brand new XSD for REMIT Table 4 is not based on the Edig@s standard. This is a contradiction regarding the requirements of:

1) REMIT IAs (Article 10 point 3):

3. The Agency shall after consulting relevant parties establish procedures, standards and electronic formats 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) INT NC (Article 20 point 2):
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.==

*INT NC (**article 21 point 2**):*

The common data exchange solutions shall comprise the protocol, the data format and the network. The following common data exchange solutions shall be used for each of the types of data exchange listed in paragraph 1: (a) For the document-based data exchange: (i) ==protocol: AS4==*; (ii)* ==data format: Edig@s-XML,== *or an equivalent data format ensuring identical degree of interoperability. Entsog shall publish such an equivalent data format.*

Furthermore, it also

3) invalidates the efforts and proposals of EASEE-gas for improvements of the existing and currently used Edig@s based GasCapacityAllocation schema.

And introduces

4) Extra effort and costs for ALL Market Participants to build and maintain an extra interface |

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

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Proposed change No. A.4.1

Respondent's view ∗

[The Edigas messages are all generated using the international standard IEC 62325-450. The document XSD is composed as follows:

.
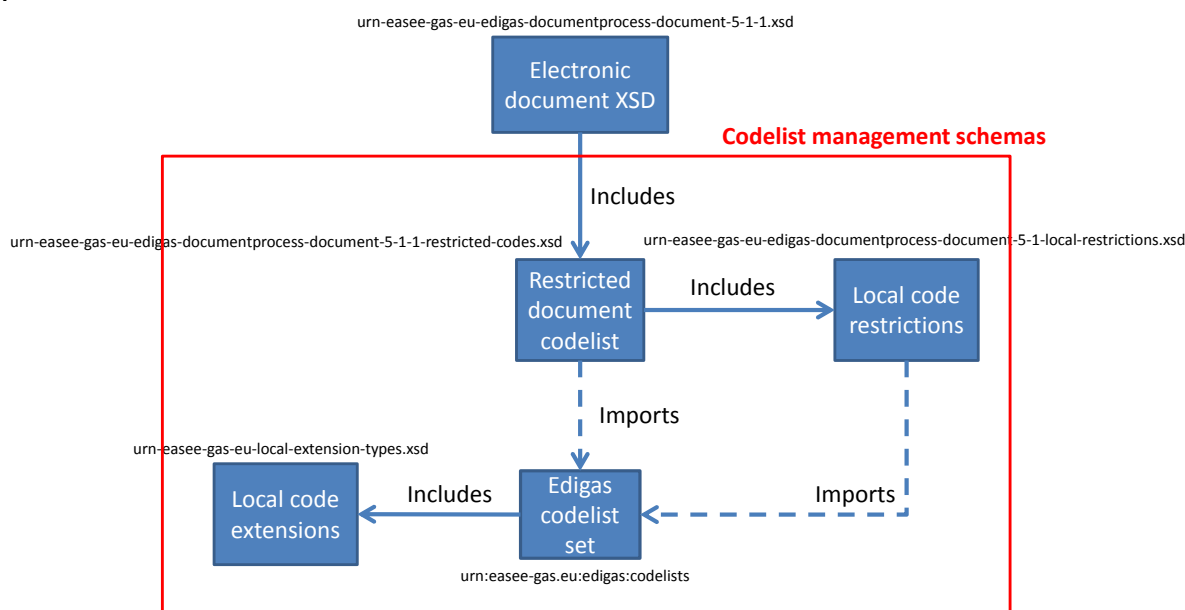
As can be seen in the above diagram the code lists are managed outside the document schema itself. This is a static structure that never changes. It ensures that the restrictions applied to a codelist for an attribute are controlled at the schema level. It also enables the code lists to evolve without impacting the document schema itself. If ACER so wishes it would be possible to remove the "local" extensions as these are applied to different "local" implementations within a market area.

The majority of the ACER proposed changes concern code lists and will not require changes in the document schema but simply in the codelist restrictions schema.

Since this implementation is used throughout the markets it is preferable not to change the document schema. ***We strongly recommend maintaining the current table 4 schemas.***
This would consequently ensure compatibility with the regulations and the TRUM and not require the market to implement a new schema with the unnecessary added cost of implementation.

As far as we can see from the proposed changes there is ***only one "mandatory" field*** that needs to be changed to "dependent" and it appears that the dependency constraint has been sufficiently defined to enable the control the presence of the attribute when it is required.

Proposed change No. A.4.2

Respondent's view *

There is no issue to extend the currency codelist with the currencies of the countries not using Euros. This merely requires the extension of the currency restricted codelist accordingly.

However, there is an issue with the codes that are not ISO 4217 compliant (GBX, EUX and PCT). These codes do not exist in the ISO 4217 currency code standard. The use of EUR and GBP in the place of EUX and GBX merely require the use of the decimal places representing Euro cents and pence.

If the introduction of the codes EUX and GBX is to satisfy the TRUM text "*(currency of the price using the smallest denomination in the currency system)*" that implies that all price amounts should be expressed in their lowest currency this means that all the currencies will have to be revised accordingly. For example "grojz", "haléru", "ore", etc will have to be added. We do not recommend this approach and propose the TRUM be modified to respect ISO 4127 as indicated in the TRUM type and to delete the above phrase.

The **code PCT (percentage)** is not understood to be a recognised currency and must be removed.

Proposed change No. A.4.3

Respondent's view ∗

The current schema has a generic attribute that defines the currency used for all prices within the electronic document.

Consequently data field 17 of the TRUM (currency.code) identifies the currency for all the price attributes that are defined in the document.

It is naturally assumed that the prices for an electronic document are all expressed in the same currency.

No change recommended the proposed change A.4.2 is sufficient.

EASEE-gas

Streamlining the gas business

Proposed change No. A.4.4

Respondent's view *

There is no issue to add the codes for the roles ZSH and ZUA to the restricted codelist for the issuer market participant.

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Proposed change No. A.4.5

Respondent's view *

There is no issue to add the coding schemes "A01" for an ACER code and "9" for a GLN code to the data field 27 coding schemes.

However, the addition of the code BIC (Bank Identification Code), which only identifies banking institutions their country and eventually their outlets, appears not to be relevant in the context of gas transactions and fundamental data. To our knowledge banks operating within the gas sector already have and use an EIC code. To our knowledge it is not used in the gas sector for transaction data or fundamental data reporting

The addition of the LEI (Legal Entity Identifier) code that uniquely identifies legally distinct entities that engages in financial transactions. Implementation limit date January 2018. It is a code that has a 20 character length and will require a change to the coding scheme core component datatype for coding schemes that is currently limited to 16 characters. This code is not used within the gas sector. It is also necessary for a market participant to apply via a LOU (local operating unit) and pay for an LEI code. Finally the code must be renewed on a periodic basis.

Since all market participants should have an ACER code it is felt sufficient to extend the coding schemes to EIC, ACER and GLN.

While we understand the requirement for ACER to provide for the LEI and BIC codes in the ARIS system, it is not a requirement to make use of these codes within the gas sector.

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Proposed change No. A.4.6

Respondent's view *

There is no issue to add the coding schemes "A01" for an ACER code and "9" for a GLN code to the data field 27 coding schemes.

However, the addition of the code BIC (Bank Identification Code), which only identifies banking institutions their country and eventually their outlets, appears not to be relevant in the context of gas transactions and fundamental data. To our knowledge banks operating within the gas sector already have and use an EIC code. To our knowledge it is not used in the gas sector for transaction data or fundamental data reporting

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Since all market participants should have an ACER code it is felt sufficient to extend the coding schemes to EIC, ACER and GLN.

While we understand the requirement for ACER to provide for the LEI and BIC codes in the ARIS system, it is not a requirement to make use of these codes within the gas sector.

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Proposed change No. A.4.7

Respondent's view ∗

There is no issue to add the coding schemes "A01" for an ACER code and "9" for a GLN code to the data field 27 coding schemes.

However, the addition of the code BIC (Bank Identification Code), which only identifies banking institutions their country and eventually their outlets, appears not to be relevant in the context of gas transactions and fundamental data. To our knowledge banks operating within the gas sector already have and use an EIC code. To our knowledge it is not used in the gas sector for transaction data or fundamental data reporting

The addition of the LEI (Legal Entity Identifier) code that uniquely identifies legally distinct entities that engages in financial transactions. Implementation limit date January 2018. It is a code that has a 20 character length and will require a change to the coding scheme core component datatype for coding schemes that is currently limited to 16 characters. This code is not used within the gas sector. It is also necessary for a market participant to apply via a LOU (local operating unit) and pay for an LEI code. Finally the code must be renewed on a periodic basis.

Since all market participants should have an ACER code it is felt sufficient to extend the coding schemes to EIC, ACER and GLN.

While we understand the requirement for ACER to provide for the LEI and BIC codes in the ARIS system, it is not a requirement to make use of these codes within the gas sector.

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Proposed change No. A.4.8

Respondent's view *

It is possible to change the multiplicity of data field 2 from mandatory to dependant since the constraint has now been clearly defined to ensure that it is only present when the process transaction type (field 9) is equal to ZSW (ascending clock auction) or ZSX (uniform price auction). It shall not appear if any other codes are used.

However here the phrase "and other processes executed on the OMP". Is not clear as the other processes have not been identified and there are apparently no codes allocated to identify them.
The complete set of OMP operations must be defined for this to be correctly implemented. For example is it sufficient to simply indicate that this must be present when the transaction type is equal to ZSW or ZSX and to remove the rest of the text.

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Proposed change No. A.4.9

Respondent's view *

The correct definition of the Edigas namespaces for the electronic documents used within REMIT should be:

urn-easee-gas-eu-edigas-remit-gascapacityallocationsdocument-5-1-n.xsd
urn-easee-gas-eu-edigas-remit-contractmarketmonitoringdocument-5-1-n.xsd
urn-easee-gas-eu-edigas-remit-nominationmonitoringdocument-5-1-n.xsd

It should be noted that the "release" of the electronic document implementation guide is now indicated by replacing the value "n" with the release number. The existing attribute "release" is still present in the schema but is no longer mandatory.

The current value within REMIT is for example:
urn-**easeegas**-eu-edigas-remit-contractmarketmonitoringdocument-5-1.xsd
Unfortunately however we were not allowed to correct it prior to the start-up of REMIT.

Proposed change No. A.5.1

Respondent's view *

The transaction attribute may be changed to optional. However, it must be clear that in this case the identification of the Transaction class becomes the "type" attribute.

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Proposed change No. A.5.2

Respondent's view ∗

It is possible to add a new attribute to the Contract marketing monitoring document header that is optional and with the name "responsibleTso_MarketParticipant.identificatiion".

The proposal concerning the codes A01, LEI, EIC, etc please refer to A.4.5.

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Proposed change No. A.5.3

Respondent's view ∗

The correct definition of the Edigas namespaces for the electronic documents used within REMIT should be:

urn-easee-gas-eu-edigas-remit-gascapacityallocationsdocument-5-1-n.xsd
urn-easee-gas-eu-edigas-remit-contractmarketmonitoringdocument-5-1-n.xsd
urn-easee-gas-eu-edigas-remit-nominationmonitoringdocument-5-1-n.xsd

It should be noted that the "release" of the electronic document implementation guide is now indicated by replacing the value "n" with the release number. The existing attribute "release" is still present in the schema but is no longer mandatory.

The current value within REMIT is for example:
urn-**easeegas**-eu-edigas-remit-nominationmonitoringdocument-5-1.xsd
Unfortunately however we were not allowed to correct it prior to the start-up of REMIT.

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Proposed change No. A.5.4

Respondent's view *

There is a difference between the use of the coding scheme identifier "ZSO" (TSO managed codeing scheme) and the coding scheme identifiers A01 (ACER managed coding scheme) and 305 (EIC managed coding scheme).
The coding scheme identifiers A01 (ACER code) and 305 (EIC) are used to identify parties
The coding scheme identifier 305 (EIC) can be used to additionally identify connection points.

In the case of ACCOUNTS, the coding scheme identifier "ZSO" (TSO managed code) is used exclusively to identify "Accounts", commonly called "shipper accounts", "balance groups", or portfolio accounts. These are allocated as required by System Operators or market area operators as required. It is possible in the electronic document, if required, to identify the system operator that allocated the code in a separate attribute.

In the nomination monitoring document the Account class has the possibility of indicating the party that assigned the Account code (InternalAccountTso and ExternalAccountTso). With this it is possible to uniquely identify the account code.

In the case where the codes A01(ACER code) or 305 (EIC) code is used to identify these parties it would be possible to extend the coding scheme to 9 (GLN codes).

We have reservations concerning the use of LEI and BIC codes in this context (refer to previous comments)

A Market Role code is not defined associated with a coding scheme but rather to identify the role of a party related to it.

A market role set of codes can be found in a unique Edigas codelist describing all the market roles for gas. Refer to the Edigas codelist and to the EASEE-Gas role model where all the roles used in the gas sector have been aligned.

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Proposed change No. A.5.5

Respondent's view *

Agreed the word "timeseries" was erroneously defined in the XSD as "timseries".

Unfortunately it was not permitted to correct this error before the start-up of the REMIT process.

Proposed change No. A.5.6

Proposed change No. A.5.7

Proposed change No. A.5.8

Proposed change No. A.6.1

Respondent's view ∗

Out of scope, these do not concern Edigas messages.
5.6 and 5.7 concern the electronic document REMITLNG Report
5.8 concerns the electronic document REMITStorageReport
6.1 concerns urgent market messages

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Proposed change No. A.6.2

Respondent's view ∗

The whole electricity and gas market as well as most of industry in international trade make use of the UN/ECE Recommendation 20 common codes to identify units of measure.

https://www.unece.org/fileadmin/DAM/uncefact/recommendations/rec20/rec20_Rev13e_2017.xls

This is extensively used throughout the industry.
It is recommended to make use of these standardised codes.
The UN/ECE recommendation 20 unit of measure codes for the some of the mentioned values are

KW1 = Kilowatt-hour per hour (kWh/h)

KW2 = Kilowatt-hour per day (kWh/d)

KWH = Kilowatt hour (KWh)

GWH= Gigawatt hour (GWh)
D32 = Tere watt

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Proposed change No. A.6.3

Proposed change No. A.6.4

Proposed change No. A.7.1

Proposed change No. A.7.2

Proposed change No. A.7.3

Proposed change No. A.7.4

Proposed change No. A.7.5

Respondent's view *

Out of scope
A.6.3 concerns urgent market messages (note however, that the value appears not to be a code but text.
A.6.4 concerns urgent market messages for electricity
A.7.1 concerns changing the year to a 4 digit value. Note this is the case for all Edigas dates.
A.7.2 concerns having a pattern to manage datetime values. Note this is the case for all Edigase dates and times. However it should be noted that ALL Edigas dateTimes are in UTC (no local times are allowed in order to avoid confusion).
A.7.3 concerns removing a default value from mandatory fields. Note this is the case for all Edigas mandatory fields.
A.7.4 Concerns removing space characters from the UTI type and the contract ID. Note: Not in Edigas messages.
A.7.5 change a pattern in table one for a field called "extra". Not of Edigas interest.
Note: this field is apparently present in order to enable an extension of the schema with content which is not defined!!

Proposed change No. A.7.6

Respondent's view *

No issue with minimal and maximum length of a mandatory field. This is implemented in all the Edigas schemas.

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Proposed change No. A.7.7

Respondent's view ∗

We do not understand what is being asked. The examples are unclear.

Proposed change No. A.7.8

Respondent's view *

Out of scope as it concerns LNG and gas storage

Proposed change No. A.7.9

Respondent's view ∗

The units of measure should respect the UN/ECE Recommendation 20: Codes for Units of Measure Used in International Trade: common codes.

https://www.unece.org/fileadmin/DAM/uncefact/recommendations/rec20/rec20_Rev13e_2017.xls

These units of measure are used within the electricity and gas sectors.

Proposed change No. A.8.1

Respondent's view *

Storage facilities and LNG facilities should be identified only with EIC "W" codes.
Definition of an EIC "W" code
(https://www.entsoe.eu/fileadmin/user_upload/edi/library/downloads/EIC_Reference_Manual.pdf)
EIC object type W (Resource object)
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.

"Z" codes are used only for the identification of interconnection points.
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.

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Proposed change No. A.8.2

Proposed change No. A.8.3

Respondent's view *

Out od scope
A.8.2 concerns the urgent market message
A.8.3 concerns making a urgent market message mandatory

Annex C - Form for providing additional changes and comments

Data type	TRUM
Impacted field(s)	Chapter 7 introduction
Description of your change proposal/Other comment	The phrase "the 'description of accepted values' only contains examples of values" should be removed and all the accepted coded values should be placed in the tables. The attached Excel file provides all such values.
Motivation for the change	It should be noted that this is the only chapter where this phrase exists. Without a clear expression of what values are acceptable it is not possible to clearly identify the codes to be used. No reference is made to the Edig@s Implementation Guide consequently any value can be indifferently used.

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Data type	Proposed change A.4.1
Impacted field(s)	Replace the Edigas schemas with a new set of schemas
Description of your change proposal/Other comment	**All the requested changes to the existing Edigas schemas with the exception of one concern the change of codelists and do not impact the schema for the electronic document.** **Consequently we totally disagree with their replacement.**
Motivation for the change	**The current schemas do not require any further implementation mapping process. The majority of the changes refer to the addition of other coding schemes (ACER, GLN) which the majority of current implementations do not cover.** **The cost of implementing within a short timeframe a new electronic document is far higher than the cost of the modification of the codelsits and will require a complete impact analysis to determine any problem areas.**

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