



ACER Consultation on the revision of electronic formats for transaction data, fundamental data and inside information reporting

EDF Group Response – Cover Letter

December 8th, 2017

General comments

EDF Group welcomes ACER's public consultation on the revision of electronic formats for transaction data, fundamental data and inside information reporting. As a preliminary comment, EDF Group understands the aims and objectives of the current consultation whereby ACER:

- i) intends to change the currently used XML schemas for transactions reporting *"only insofar as it is necessary"* further to enhance data collection and data quality;
- ii) and aims to *"ensure consistency"* in the way REMIT transaction and Fundamental data are reported.

However, EDF Group would like to draw ACER's attention on the risks of imposing too many changes on the current reporting formats, which would create unnecessary burdens on market participants. REMIT provides namely that *"Reporting obligations should be kept to a minimum and not create unnecessary costs or administrative burdens for market participants"* (Recital 19). Furthermore, ACER should take into account the need for consistency between the different existing reporting and publication schemes for inside information and in particular the formats used by the ENTSO-E Platform (EMFIP).

In that respect, ACER should be aware that: (i) some changes could potentially lead to costly and burdensome IT changes, without clear benefit or added value for market participants; ii) while at the same time, the proposed changes may not always be consistent with the publication formats currently used on EMFIP or national platforms.

Since the inside information that must be published and reported according to REMIT regulation and the information that must be published according to Commission Regulation (EU) No 543/2013 on submission and publication of data in electricity markets, are in most cases the same, the inconsistency of formats would lead to burdensome, complex and costly implementation of data management systems by data owners. Furthermore, the publication of the same information under different formats could also be considered as misleading for the market.

In this sense, we consider that ACER should propose a minimum of changes and ensure that they represent a real simplification measure in line with the REMIT objective of reducing unnecessary burdens supported by market participants.

Finally, EDF Group would like to point out the lack of clarity on how we will ensure the continuity and compatibility with the formats of past transactions already reported to ACER. This backward compatibility is an issue that should also be addressed by ACER in the implementation framework of the proposed changes.



Specific comments

See Annexes B and C in attachment.

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

Proposed change No. A.6.3

Respondent's view

EDF Group supports ACER proposal to introduce the new accepted value "Storage facility unavailability" as far as it will enable market participants to report the unavailability of the whole gas storage facility with just one UMM message instead of three distinct UMM messages (on "Storage unavailability", "Injection Unavailability" and "Withdrawal unavailability").

It is a valuable simplification measure, in line with the general objective of reducing unnecessary burdens supported by market participants.

However, ACER will need to ensure that the proposed new value of "Storage facility unavailability" is not confused with the existing field "Storage unavailability".

Proposed change No. A.6.4

Respondent's view

EDF Group would like to stress the fact that, there are already some possibilities to publish an event affecting multiple assets under the current reporting and publication schemes.

In particular, it is currently possible to publish an interruption event linked to a "generation unit" or a "production unit" as defined by Article 2 (17) and (24) of Commission Regulation (EU) No 543/2013. Under this Regulation, "production unit" is namely defined as: "*a facility for generation of electricity made up of a single generation unit or of an aggregation of generation units*".

Thus, disclosing information at the level of "production unit" should normally enable market participants to publish an event affecting several "generation units" or multiple assets.

Another option, as mentioned by ACER in its "*Frequently Asked Questions (FAQs) on REMIT fundamental data and inside information collection*" (question 5.1.8), would be "*to use a single web feed message according to the 3rd schema type, namely "Other market information" in case the event affects a large number of facilities*".

For these reasons, we consider that there is no clear benefit expected from the proposed change.

Proposed change No. A.7.2**Respondent's view**

EDF Group does not share the need to change the format of "datetime".

In our view, it would be preferable to not change the current "datetime" format to ensure consistency between ACER's and ENTSO-E's reporting channels. It would also be in line with the general objective of not imposing unnecessary changes to market participants.

Proposed change No. A.8.2**Respondent's view**

Concerning the reporting of multi-period unavailability, EDF Group would like to emphasize the need of consistency between ACER reporting formats and the formats used by ENTSO-E platform (EMFIP).

If ACER wishes to modify the reporting of multi-period unavailability or the way unavailability fluctuate over time, it would impose some costly adaptations of market participants' IT systems and would neither be in line with EMFIP formats nor with formats implemented by national platforms.

The risk behind such inconsistency is also that if Market Participants publish the same information under different formats (e.g. one with multi-period unavailability and the other one without), it might also be misleading for the market.

For the time being, ENTSO-E Platform does not allow the publication of multi-period unavailabilities of power plants.

Some national platforms, such as Elexon for the GB market does facilitate "profiled" publications from market participants, but it is optional.

As far as we know, ENTSO-E is currently thinking about allowing publication of unavailabilities' profiles on its platform, also on an optional basis.

To ensure the consistency between EMFIP (or national platforms) and ACER formats for multi-period UMMs, we consider therefore that the new elements "intervalStart" and "intervalStop" introduced by ACER should remain optional and should not replace "Event start" and "Event stop".

Proposed change No. A.8.3**Respondent's view**

We support the proposal to change the Data Field No (17) Affected Asset or Unit EIC Code from optional to mandatory.

Annex C- Form for providing additional changes and comments

Data type	Inside information reporting
Impacted field(s)	Data Field No (13) Remarks
Description of your change proposal/Other comment	The maximum length of the free text should be extended to, at least, 1000 alphanumeric characters.
Motivation for the change	The remarks are often published in both English and the national language. Quite often links to other websites are posted because the number of characters allowed is too short. Extending this field will allow market participants to publish more detailed information.

Data type	All data types (where relevant)
Impacted field(s)	“Datetime” in Table 1 and Table 2 schemas
Description of your change proposal/Other comment	In defining the “datetime” format across the REMIT reporting schemas, ACER should also take into account the state of the art of IT service providers and to which extent the clock used in IT applications or softwares can be perfectly synchronized or not with UTC time convention.
Motivation for the change	

Data type	All data types (where relevant)
Impacted field(s)	General comment
Description of your change proposal/Other comment	<p>Once the revision of the formats is adopted by ACER, it is not clear how we will be able to ensure the continuity and compatibility with the formats of past transactions already reported to ACER.</p> <p>This backward compatibility is an issue that should be taken into account by ACER in the implementation framework of the proposed changes.</p>
Motivation for the change	For example, the evolution of format could raise some difficulties if we need to have access to past transactions reported under a different format.

Data type	Fundamental data publication and reporting
Impacted field(s)	General comment on transparency with regard to gas infrastructure
Description of your change proposal/Other comment	<p>EDF Group takes the opportunity of the present consultation to point out that there is still some lack of clarity with regard to the approach for transparency of gas infrastructure:</p> <p>It should be the responsibility of the owner of an asset to publish all relevant information with regard to his asset. As a principle, this should not be a shippers' responsibility.</p> <p>In this sense, the owners of gas infrastructure should not only publish information on the availability of their infrastructure, but also on the gas flows.</p>
Motivation for the change	Need for clarification