

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

ENTSO-E Response to the ACER Public Consultation on the Revision of electronic formats for transaction data, fundamental data and inside information reporting

A.1 – Proposed changes to reporting standard contracts in accordance with Table 1 of the Implementing Acts

Proposed change No. A.1.2

Respondent's view

The change itself makes sense and ENTSO-E supports such a suggestion, however, the timing of the change should be synchronized with proposal A1.1 so that the market participants can manage their systems' updates efficiently. Nevertheless, appropriate level of detail also has to be provided to the market participants on how to handle the change to a new version of the schema as it may affect previously submitted data.

Proposed change No. A.1.3

Respondent's view

The actual Guidance on UTI is coordinated and arranged by a vast number of market participants. This change would induce a lot of administrative work (update of existing contracts, coordination), possibility for potential failure in UTI generation, and changes in the implementation. This change would also have cost implication on the market participants side. For those reasons we recommend keeping the format as it is.

Proposed change No. A.1.5

Respondent's view

ENTSO-E encourages ACER to avoid the use of mock values. This may lead later to confusions and uncomplete information provision. And, in general, the use of mock values does not seem to respect certain standards of professionalism.

A.3 - Proposed changes to reporting electricity transportation contracts in accordance with Table 3 of the Implementing Acts

Proposed change No. A.3.1

ENTSO-E recommends not changing the currently applicable schema which is based on industry standards as it is proposed by the Implementing Regulation; any change would have cost implication on the market participants side. Whenever ACER thinks there is a need for a change in the format, we recommend to use existing international (IEC, CENELEC) formats or if they require amendments, requests should be sent accordingly to the appropriate bodies in charge.

A.4 - Proposed changes to reporting gas transportation contracts in accordance with Table 4 of the Implementing Acts

Proposed change No. A.4.5, A.4.6 & A.4.7

Respondent's view

EIC-codes are today used in European energy market and are centrally managed by ENTSO-E CIO/LIO organisation. Every market participant can apply for such a code at his local LIO. We believe the identification through other coding schemes could lead to confusion and unnecessary IT developments generating unnecessary costs. Besides, the EIC codes can be easily checked as opposed to other coding schemes..

ENTSO-E would like to raise the issue of uniqueness in using one of the new proposed codes:

1. Legal Identifier Entity (LEI): This code is different from the EIC in that it allows for subsidiaries companies to have the same LEI number. In other words, the LEI code does not preserve uniqueness. In fact, the current registry of market participants, published by ACER has several examples of different companies sharing the same LEI number.
2. BIC number: The concept of BIC is similar to the one of LEI described above. In other words, ENTSO-E wonders how ACER will distinguish between n-number of market participants, if all of them use the same BIC number.
3. GS1: Although GS1 coding scheme should be unique, following the EIC approach, it appears that in ACER registry there are few cases where this is not the case (i.e. two market participants use the same GS1. A quality check might resolve this issue. However, the fact that there are only 200 GS1 codes in the whole REMIT registry (1.5%) might not justify the use of this code and therefore the complexity of the REMIT database.
4. ACER number: In few cases, a market participant appears to have two ACER numbers. This will allow this market participant to use different EIC code for different reporting instances.

In addition, ENTSO-E recommends not to use code 'A01' for an ACER code as in ENTSO-E the codingScheme 'A01' is used to identify an EIC code. To prevent any confusion another code (eg. 'ACE') should be used to identify an ACER code.

Proposed change No. A.4.8

Respondent's view

ENTSO-E encourages ACER to avoid the use of mock EIC codes. This may lead later to confusions and uncomplete information provision. And, in general, the use of mock values does not seem to respect certain standards of professionalism

One solution could be that ACER modifies the schema to use the following as optional: **OrganisedMarketPlace_MarketParticipant**

There is a discrepancy in this change. ACER proposes that the attribute ORGANISEDMARKETPLACE_MARKETPARTICIPANT.IDENTIFICATION (Data Field No (2) Organised market place identification) is mandatory but DEPENDENT and present ONLY in special cases.

Proposed change:

The Agency proposes that the attribute ORGANISEDMARKETPLACE_MARKETPARTICIPANT.IDENTIFICATION (Data Field No (2) Organised market place identification) is not mandatory but DEPENDENT and present ONLY when reporting transactions concluded on an OMP.

A.5 - Proposed changes to fundamental data reporting

Proposed change No. A.5.2

Respondent's view

ENTSO-E believes that this is not necessary. In fact, the EIC code (which is already allowed today) is sufficient for this field, because all existing TSOs are already identified by an EIC code.

A.7 - Proposed miscellaneous changes applicable to more than one data type

Proposed change No. A.7.2

Respondent's view

We strongly advise ACER to use UTC in order not to confuse the reporting and market participants.

Inside Information

Proposed change No. A.8.1

Respondent's view

ENTSO-E agrees with this choice. However, ENTSO-E strongly encourages ACER to avoid any internal validation on the type of EIC code (W, T, X, Y or Z). This symbol is used by the EIC local issuing offices to facilitate the process and maintain good data quality. If ACER wishes to improve the quality of the EIC codes received, they can perform a validation on the check digit. For information purposes, the EIC type used to identify the LNG facilities is a W code and not a Z code.

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

We welcome this change in the proposed schema. The new schema makes it possible to publish time series for an outage event instead of creating a high number of UMMS for one event.

Nevertheless, an even better solution would be to fully align with the ENTSO-schemas for outages.

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

Annex C- Form for providing additional changes and comments

Data type	General Comments
Impacted field(s)	<p>General Comments</p> <p>In any case, it is fundamental that Market Participants are allowed sufficient implementation and transition time (at least 6 months).</p> <p>ENTSO-E notices that in the schemas ACER uses, the patter of EIC code is described as</p> <pre><xs:maxLength value="16"/> <xs:minLength value="16"/> <xs:pattern value="[0-9][0-9][XYZTWV].+"/></pre> <p>In fact, ENTSO-E has no restriction in the first two digits. Although they appear to be numbers, this might change in the future, if e.g. the number of Local Issuing Offices become more than 100.</p> <p>ENTSO-E strongly suggests that ACER uses the following correct pattern for attributes accepting only EIC codes.</p> <pre><xs:length value="16"/> <xs:pattern value="([A-Z0-9]{2}([A-Z0-9] [-]){13})[A-Z0-9]"/></pre> <p>Additional comment to UMM-Schema</p> <p>The currently provided definition for the field technical capacity is unclear, and therefore we believe this creates misunderstandings when reading the provided data on ACER side. It is worth to note that there is no such information provided under the TP regulation therefore market participants might have difficulties filling this field in. We either propose making the definition clearer or making the field optional.</p>
Description of your change proposal/Other comment	
Motivation for the change	