

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

Proposed change No. A.3.1

Respondent's view *

Although ENTSOG and gas TSOs are not affected by this change, we believe that this suggestion is not in line with the scope of the consultation:

"...

The Agency intends to change the currently used XML schemas for transaction reporting **only insofar as it is necessary** further to enhance data collection and data quality. In addition, this Public Consultation addresses some minor changes of the fundamental data reported with IEC and Edigas standards."

To completely **discard** the existing six industry based schemas and replace them with new schemas is NOT a minor change and would require IT projects from ALL RRM reporting this data type.

Furthermore, the proposal for introduction of a brand new XSD for REMIT Table 3 is not based on the IEC 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.

Proposed change No. A.4.1

Respondent's view *

"Although ENTSOG and the gas TSOs understand the desire for harmonisation of the schemas, we believe that this suggestion is not in line with the scope of the consultation:

The Agency intends to change the currently used XML schemas for transaction reporting **only insofar as it is necessary** further to enhance data collection and data quality. In addition, this Public Consultation addresses some minor changes of the fundamental data reported with IEC and Edigas standards.

To completely **discard** the existing five Edigas schemas and replace them with a new schema is a big change and would require massive workload and cost intensive IT projects from ALL RRM reporting table 4 data, potentially also from the TSOs acting as Market Participants and supplying data to a 3rd party RRM. The proposed change also contradicts with "Whereas 19" of REMIT:

Reporting obligation should be kept at a minimum and not create unnecessary costs or administrative burdens for Market Participants. Bearing in mind that only 15 of 50 RRM reporting table 4 data are also reporting table 1 and/or table 2, this would create unnecessary IT project for the majority of those RRM reporting table 4.

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 RRM reporting gas transportation contracts and ARIS.

It should also be taken into consideration that ...

- 1) The Agency was obliged to develop the schemas for REMIT reporting, and EASEE-gas and ENTSOG supported the Agency with developing the current schemas which have been approved by ACER after public consultation
- 2) ENTSOG does not recognize the statement that market participants are forced to report data that is not listed in Table 4.
- 3) the industry based standards were introduced to enable the market to report their data stemming from the market processes in their system, and doing so at as low costs and administrative burden as possible.
- 4) The current process is fully automated and working and new schemas may require manual error-prone transfer of data.
As the new schemas are not tested yet, we may have to re-do this evaluation of the REMIT electronic formats again in the future which is adding unnecessary cost

Furthermore, 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 several pieces of legislation:

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. This is also mentioned in Table 4 of the implementing Acts for field 9 and 14.

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.*

It also

3) invalidate the efforts and proposals of EASEE-gas and ENTOSG AND GAS TSOS for improvements of the existing and currently used Edig@s based GasCapacityAllocation schema.

Proposed change No. A.4.2

Respondent's view *

"ENTSOG AND GAS TSOS supports aligning the possible currency values for for Data field (17) CURRENCY.CODE of GASCAPACITYALLOCATION DOCUMENT with those accepted by REMITtable 2.

However, for the currencies GBX, EUX and PCT, please consider the argumentation below and be advised that we have added an additional suggestion for data field 17 in Annex C).

Issue: 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 4217 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 *

ENTSO AND GAS TSOS supports the change suggested as long as the extra currency attribute does not become mandatory for the reporting .

Proposed change No. A.4.4

Respondent's view *

ENTSO support the suggestion.

Proposed change No. A.4.5

Respondent's view *

ENTSO supports the proposal.

Proposed change No. A.4.6

Respondent's view *

ENTSO supports the proposal.

Proposed change No. A.4.7

Respondent's view *

ENTSO supports the proposal.

Proposed change No. A.4.8

Respondent's view *

ENTSO supports the proposal that the identification of the OMP shall be Mandatory but dependant and present ONLY in case of reporting of transactions always concluded on OMP, i.e. when PROCESS_TRANSACTION.TYPE is equal to

- ZSW = Ascending clock auction
- ZSX = Uniform price auction

and highlights that the identification of the OMP shall be Optional (and can be left blank) for all other transactions:

- ZSY = First come first served
- ZSZ = Secondary market procedure
- Over-nomination
- Open Subscription Window
- Open season
- Storage allocation
- Non-ascending clock pay-as-bid auction
- Conversion mechanism
- Pro-rata mechanism

Proposed change No. A.4.9

Respondent's view *

ENTSO supports the correction of the Edigas namespaces but suggests that this is based on input from Easegas. ENTSOG also requests that the Agency makes sure that the files with old namespaces will still be acceptable by ARIS after the new namespace is introduced.

Proposed change No. A.5.1

Respondent's view *

ENTSO supports the suggestion.

Proposed change No. A.5.2

Respondent's view *

ENTSO supports adding the new field, but doesn't see the need for more values than necessary. All TSOs have EIC codes and thus we just need the coding scheme "305" representing an EIC code.

Proposed change No. A.5.3

Respondent's view *

ENTSO supports the correction of the Edigas namespaces but suggests that this is based on input from Easegas. ENTSO also requests that the Agency makes sure that the files with old namespaces will still be acceptable by ARIS after the new namespace is introduced.

Proposed change No. A.5.4

Respondent's view *

ENTSO supports ONLY the **extension** of allowed values. ENTSO **does not** support the removal of ZSO as identifier in the code schema of gas nomination monitoring schema:

- 1) The code "ZSO" is used in several places as it is needed for identifying the reporting party (TSO = ZSO). This is also acknowledged by the suggestion in A.4.4 where ZSO is still allowed ("ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE")
- 2) TSO managed codes are necessary until NRAs have ensured that ALL market participants are registered with EIC or ACER codes, so the TSOs can fulfil their reporting obligations.

For the market communication there are industrial standards given by EASEE-gas and approved by regulators. These standards are valid for the whole gas market and are used as binding principles for the TSO-TSO, Shipper-TSO and market area manager-

Shipper communication. These standards also define which codes can be used for the identification of the parties, points, accounts etc. and it is a basic element of these standards to require that market role specific codes are used for identification of the parties. This requirement is satisfied when a ZSO Code is used. Therefore, it is necessary to use a ZSO code in market communication. As ZSO is a valid code for the communication, the introduction of ZSO-code in REMIT reporting would align the standardized communication within the market with the communication towards ACER as the market participants are able to create the messages towards ACER from the information given in the messages used in market communication based on the industrial standards.

Example in the German gas market, where the balancing group responsible is the nominating party: A balancing responsible is not the one who buys capacity, no trader, so in fact he doesn't have to register as a market participant with ACER and a balancing group responsible has also no obligation to get an EIC-Code. The TSOs have no instrument to force them getting any of these codes.

This means that the TSOs in some cases won't be able to fill the field "INTERNAL_MARKETPARTICIPANT.IDENTIFICATION" (described as: Identification of the Market Participant that provided the nomination information to the Responsible Transmission System Operator.) in the gas-nomination-monitoring-schema."

There are many examples where ZSO is necessary:

```
internalAccount =
NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.internalAccount
externalAccount =
NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.externalAccount
```

In addition, ZSO code should remain for following Edigas XSD element for gas allocation:
GasCapacityAllocations_Document.Transportation_Transaction.primary_MarketParticipant.account.internalAccount

By "internal/external account" TSOs identifies the shipper's account/accounts in the TSOs internal systems, not the shipper itself.

It is possible that one shipper has many internal/external accounts.
For the nomination reporting purposes this identification can be done by using ZSO or 305 (EIC), but bear in mind that here the EIC code refers to EIC area code (with "Y" letter within the code number) and not the EIC for party codes (with "X" letter within the code number). It is not always possible to use EIC (Y) code for every shipper's account.

```
issuer_MarketParticipant.marketRole.code
```

In this element the "ZSO" is not a code to identify the Market Participant but to describe the characteristic of Market Participant – the role of the MarketParticipant.

```
recipient_MarketParticipant.marketRole.code
```

Currently, the only permitted code to describe the characteristic of Market Participant is "ZUA" in

this element.

issuer_MarketParticipant.identification

recipient_MarketParticipant.identification

responsibleTso_MarketParticipant.identification

Currently, the only permitted code to identify the TSO in these elements is the EIC code.

internalAccountTso =

NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.internalAccountTs

o

externalAccountTso =

NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.externalAccountTs

o

Currently, the only permitted code to identify the TSO in these elements is the EIC code.

Proposed change No. A.5.5

Respondent's view *

ENTSOG does not object to the change.

Proposed change No. A.5.6

ENTSOG supports the suggestion.

Respondent's view *

ENTSOG supports the suggestion.

Proposed change No. A.5.7

[please provide the number of question to which you are providing feedback]

Respondent's view *

ENTSOG supports the suggestion.

Proposed change No. A.5.8

[please provide the number of question to which you are providing feedback]

Respondent's view *

ENTSO-G supports the suggestion.

Proposed change No. A.6.1

Respondent's view *

ENTSO-G supports the suggestion.

Proposed change No. A.6.2

Respondent's view *

ENTSO-G supports adding GWh/h, but not the removal of mcm/d as this is not aligned with the other schemas and thus data analysis would become difficult as conversion would be necessary.

Proposed change No. A.6.3

Respondent's view *

ENTSO-G supports the suggestion but requests for clarity in the Manual of Procedures for when to use which codes for the difference between "Storage unavailability" and "Storage facility unavailability" and in which cases each of the event types shall be used: "Storage facility unavailability", "Storage unavailability", "Injection unavailability", "Withdrawal unavailability"..

Proposed change No. A.7.2

Respondent's view *

ENTSO-G does not support the proposal as the time settings are already aligned in the REMIT schemas and there is no added value for changing the settings.

Proposed change No. A.7.6

Respondent's view *

ENTSO-G supports the proposal.

Proposed change No. A.7.7

Respondent's view *

ENTSO-G does not as such support an approach of introducing validation rules on the fly but suggests that validation rules are discussed with the relevant stakeholders (ENTSOs and TSOs, LNG and Storage operators etc) before implementation.

Proposed change No. A.7.8

Respondent's view *

ENTSO-G supports the proposal.

Proposed change No. A.7.9

Respondent's view *

ENTSO-G does not support the proposal as it is not aligned with other schema types.

Proposed change No. A.8.1

Respondent's view *

ENTSO-G supports the proposal.

Proposed change No. A.8.2

Respondent's view *

ENTSO-G does not support the proposal.

We are not completely sure if it is useful to have this complex change towards the scheme. Today we would use the field comments/remarks to indicate different period, if necessary. All in all, there would be much effort to update each hour, if the capacity available is changing on an ad-hoc basis. The aim of this change should also not be to update after the maintenance etc. what was the capacity that was available during the outage.

Proposed change No. A.8.3

Respondent's view *

ENTSO-G cannot support this proposal as not all facilities and physical objects can be identified with EIC. 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.

*** 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	Table 4
Impacted field(s)	TRUM data field 9 PROCESS_TRANSACTION.TYPE
Description of your change proposal/Other comment	<p>Additional values to be allowed for the attribute PROCESS_TRANSACTION.TYPE that will permit proper and accurate identification of the applied capacity allocation process:</p> <ul style="list-style-type: none"> • 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 <p>* These codes are merely suggestions</p>
Motivation for the change	<p>The change will allow the reporting parties to precise the information for the applied allocation process. Furthermore, it will avoid the usage of workaround and arbitrary values that limit the monitoring possibilities of ACER and the NRAs</p>

Data type	Table 4
Impacted field(s)	Data Field 17 Currency
Description of your change proposal/Other comment	Please align the allowed entries with ISO 4217 to ensure compliance with industry standards.
Motivation for the change	Some allowed values are not adding value to the reported data e.g. EUX and GBX, which are merely replacing two decimals. PCT is not a currency and should not be allowed.

Data type	Table 4
Impacted field(s)	Data Field 27 Market Participant identification
Description of your change proposal/Other comment	Allow an additional code "ZSO" for a TSO managed code (35 alphanumeric characters)
Motivation for the change	<p>The goal of the change is to allow the TSOs to fulfil their reporting obligations in cases when the MP to which the capacity is assigned has no EIC code or the code is not available to the TSO.</p> <p>It could happen that such MPs do not have EIC code and at the same time are not registered under REMIT (by the respective NRA or/and through CEREMP) and hence, do not have ACER code as well.</p> <p>As an example, in the German gas market the balancing group responsible is the nominating party. A balancing responsible is not the one who buys capacity, no trader, so in fact he doesn't have to register as a market participant with ACER and a balancing group responsible has also no obligation to get an EIC-Code. We have no instrument to force them getting one of these codes.</p> <p>This means, that we will in some cases not be able to fill in the field "INTERNAL_MARKETPARTICIPANT.IDENTIFICATION" (described as: Identification of the Market Participant that provided the nomination information to the Responsible Transmission System Operator.) in the gas-nomination-monitoring-schema.</p> <p>Original text from RRM survey in 2016:</p> <p>It is TSO position that the Gas Capacity Allocation schema, element 3.1.4.2 Primary Market Participant identification coding scheme shall be changed and other possibilities besides "305" (using EIC) for Market Participant identification shall be accepted. The goal is to allow the TSOs to fulfil their</p>

	<p>reporting obligations in cases when the MP to which the capacity is assigned has no EIC code.</p> <p>It could happen that such MPs do not have EIC code and at the same time are not registered under REMIT (by the respective NRA or/and through CEREMP) and hence, do not have ACER code as well.</p> <p>For this purpose we propose the scope of the allowed values to be extended by adding the values:</p> <ul style="list-style-type: none"> the code "A01" for an ACER code (maximum length 16 alphanumeric characters); the code "ZSO" for a TSO managed code (maximum length 35 alphanumeric characters). <p>The motivation to propose length of 35 alphanumeric characters for the field value in case of "ZSO" (TSO managed code) is that some TSO may identify their clients not by codes or numbers but by the MP names. In such case, we think that it would be appropriate to set allowed length to maximum length 35 alphanumeric characters (Reference: In ContractMarket Monitoring schema, the element 5.1.5.1 IDENTIFICATION-CODINGScheme is with only allowed value "ZSO"=The identification of a Shipper account that is defined by a Transmitting System Operator, with maximum allowed length of 35 alphanumeric characters).</p>
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Data type	Table 4
Impacted field(s)	Description in TRUM for Data Field 34 Price paid to TSO (underlying price)
Description of your change proposal/Other comment	Update the description of data field 34 to also include [kWh/d] as a capacity unit and add it as a new attribute in the schemas).
Motivation for the change	In case that the capacity product is daily and measured in kWh/d, it would be more appropriate to report the information for the transferred capacity and its price in units, corresponding to the type of product, i.e. daily units: kWh/d.

Data type	Table 4
Impacted field(s)	Description in TRUM for Data Field 34 Price paid to TSO (underlying price)
Description of your change	Update the description of data field 34 to also include [kWh/d] as a capacity unit and add it as a new attribute in the schemas).

proposal/Other comment	
Motivation for the change	In case that the capacity product is daily and measured in kWh/d, it would be more appropriate to report the information for the transferred capacity and its price in units, corresponding to the type of product, i.e. daily units: kWh/d.

Data type	UMM Schema No2 "Unavailabilities of gas facilities"
Impacted field(s)	Data field No 16 "Affected asset or unit name"
Description of your change proposal/Other comment	<p>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:</p> <ul style="list-style-type: none"> - Applicability: optional - Possible values: entry, exit - Type: alphanumeric characters
Motivation for the change	<p>Currently UMM Schema No2 "Unavailabilities of gas facilities" does not have an attribute for flow direction.</p> <p>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).</p> <p>The point's 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.</p> <p>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.</p>

Data type	UMM Schema No3 "Other market information"
Impacted field(s)	Data field No 13 "Remark"
Description of your change proposal/Other comment	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.
Motivation for the change	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.
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