



ETR ADVISORY

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Agency for the Cooperation of Energy Regulators
Trg Republike 3
1000 Ljubljana, Slovenia

6th December 2017

Re: Response to consultation PC_2017_R_03

We wish to respond to your public consultation on the revision of electronic formats for transaction data, fundamental data and inside information reporting.

We wish to comment on 3 issues, 2 relating to the proposed changes which are advised using form B, and 1 additional change which is advised using form C, as follows:

- Change A.1.3.
- Change A.1.5.
- Proposed additional field for gas storage.

The forms accompany this letter and are contained in a "zip" file.

Please do not hesitate to contact me if you have any questions on our response.

Yours Sincerely,

Aviv Handler

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

Etr Advisory Ltd

Proposed change No. *
A.1.3
Respondent's view *
The latest EMIR RTS provides for a switch to a global unique identifier endorsed by ESMA, when available, without further legislative change. We recommend a similar stipulation, that a global identifier endorsed by ACER can be used in future, be specified in REMIT so that alignment can be archived when such an identifier is agreed.

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

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

Etr Advisory Ltd

Proposed change No. *

A.1.5

Respondent's view *

Since the value can often be calculated from the other parameters, making it mandatory make give rise to inconsistencies.

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

Annex C- Form for providing additional changes and comments

ETR Advisory Ltd

Data type	Gas Storage data
Impacted field(s)	Proposed new field
Description of your change proposal/Other comment	We recommend a unique ID per record, which makes it clearer how to apply the action type. This is distinct from the sequence number.
Motivation for the change	Makes modifications and errors easier.