

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

A EURELECTRIC response paper

December 2017

EURELECTRIC is the voice of the electricity industry in Europe.

We speak for more than 3,500 companies in power generation, distribution, and supply.

We Stand For:

Carbon-neutral electricity by 2050

We have committed to making Europe's electricity cleaner. To deliver, we need to make use of **all low-carbon technologies**: more renewables, but also clean coal and gas, and nuclear. Efficient electric technologies in **transport and buildings**, combined with the development of smart grids and a major push in **energy efficiency** play a key role in reducing fossil fuel consumption and making our electricity more sustainable.

Competitive electricity for our customers

We support well-functioning, distortion-free **energy and carbon markets** as the best way to produce electricity and reduce emissions cost-efficiently. Integrated EU-wide electricity and gas markets are also crucial to offer our customers the **full benefits of liberalisation**: they ensure the best use of generation resources, improve **security of supply**, allow full EU-wide competition, and increase **customer choice**.

Continent-wide electricity through a coherent European approach

Europe's energy and climate challenges can only be solved by **European – or even global – policies**, not incoherent national measures. Such policies should complement, not contradict each other: coherent and integrated approaches reduce costs. This will encourage **effective investment** to ensure a sustainable and reliable electricity supply for Europe's businesses and consumers.

EURELECTRIC. Electricity for Europe.

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

Proposed change No. A.1.1

Respondent's view

We support the proposal to stop reporting with the REMITTable_V1.xsd and REMITTable1_V2.xsd schemas by 31.03.2019 and allow the use of one single schema REMITTable1_V3.xsd. Currently we are using V2 schema, but if all improvements are implemented and if all of them are acceptable, we would be using V1 schema. Nevertheless, there are some OMPs that are currently using V1 schema (e.g. EPEX).

For this reason, and in order to facilitate the management of the lifecycle events, we propose using V3 for new trades and also allowing the use of the old version for modification of outstanding deals.

Proposed change No. A.1.3

Respondent's view

EURELECTRIC supports the proposal. At the same time, we suggest that REMIT UTI codes only permit the use of capital letters (in order to simplify the sharing of the code between counterparties).

Proposed change No. A.1.4

Respondent's view

The Agency proposes that the element "Index Value", which is currently present within the contract section of the schema, to be deleted. We are currently reporting trade spreads (Index and Spread) in this field as stated by TRUM. It should be clarified where to detail this value if this field is deleted.

Proposed change No. A.1.6

Respondent's view

We support the Agency proposal that Data Field No (52) "Load type" of REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas changes from optional to mandatory.

Proposed change No. A.2.2

Respondent's view

The Agency proposes that Data Field No (44) "Load type" of Table 2 of REMIT Implementing Regulation changes from optional to mandatory. It should be taken into account that "other" will be reported when this value is not known, which does not seem to be the intention of the Agency.

Proposed change No. A.4.1

Respondent's view

The Agency proposes to simplify the reporting of gas transportation contracts data with a new schema based on the technical standards of Table 1 and Table 2 schemas: REMITTable1_V1.xsd/REMITTable1_V2.xsd and REMITTable2_V1.xsd. We welcome the Agency proposal, inasmuch as the current schema is very confusing and differs significantly from T1 and T2.

Proposed change No. A.6.4

Respondent's view

The Agency proposes to change the UMM schema in a way that all assets and/or units affected by an outage or unplanned maintenance (a single event affecting assets in the same way i.e. same timing) can be published with a single report.

Although we consider the change proposed as a sensible one, we think it should be analysed whether its implementation is straightforward and worthwhile. If implemented, TSOs will probably have to amend their reporting proceedings and so will market participants.

Proposed change No. A.7.2

Respondent's view

The Agency proposes that each element of the type "datetime" in Table 1 and Table 2 schemas includes an enforcement of the applicable pattern regarding the local time zone. No time zone offset or zoned time (with offset) is required. We welcome the Agency proposal, since – provided that MPs are required to use UTC time standard (Zulu time) – it solves the problems and eventual mistakes with conversion of local time to GMT (Zulu time). We should however ensure consistency between ACER's and ENTSO-E's reporting channels to avoid imposing unnecessary changes or additional costs to market participants.

Proposed change No. A.7.8

Respondent's view

The Agency proposes to introduce into the LNG and Gas Storage schemas the same lifecycle mechanism that exists in REMIT Table1 and REMIT Table2 allowing for corrections, modifications and cancelations of previously reported records. We welcome this proposal since currently it was not possible to make amendments.

Proposed change No. A.7.9

Respondent's view

The Agency proposes to align the units of measurement in the REMIT Storage and REMIT LNG schemas with the units for gas UMM reporting. The proposal is to limit the restrictions to kWh/d, kWh/h, GWh/d, GWh, TWh, GWh/h. We support the proposal of alignment of the units of measurement, but under our point of view MWh/d and MWh are missing.

Proposed change No. A.8.1

Respondent's view

We support the Agency proposal that storage and LNG facilities (fields "storageFacilityIdentifier" and "lngFacilityIdentifier") are only identified with EIC W and Z codes provided that dummy EICs can still be used.

Proposed change No. A.8.2

Respondent's view

The Agency proposes to introduce two new elements "intervalStart" and "intervalStop" into the complex type "capacity" and make the complex type repeatable. The change is applicable to both gas and electricity UMM schema.

For the time being, ENTSO-E platform does not allow the publication of multi-period unavailabilities of power plants. To ensure the consistency between EMFIP (or national platforms) and ACER formats for multi-period UMMs, EURELECTRIC considers that the new elements "IntervalStart" and "IntervalStop" introduced by ACER should remain optional and should not replace "Event start" and "Event stop".

Indeed, the risk could be 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.

Proposed change No. A.8.3

Respondent's view

The Agency proposes to change the Data Field No (17) Affected Asset or Unit EIC Code from optional to mandatory. We support the proposal to change this data field No (17) Affected Asset or Unit EIC Code from optional to mandatory.

EURELECTRIC pursues in all its activities the application of the following sustainable development values:

Economic Development

▶ Growth, added-value, efficiency

Environmental Leadership

▶ Commitment, innovation, pro-activeness

Social Responsibility

▶ Transparency, ethics, accountability



Union of the Electricity Industry - EURELECTRIC aisbl
Boulevard de l'Impératrice, 66 - bte 2
B - 1000 Brussels • Belgium
Tel: + 32 2 515 10 00 • Fax: + 32 2 515 10 10
VAT: BE 0462 679 112 • www.eurelectric.org
EU Transparency Register number: [4271427696-87](https://ec.europa.eu/transparency/regexp1/?table=ENL&id=4271427696-87)