

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

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

No comments

A.2 Proposed changes to reporting non-standard contracts in accordance with Table 2 of the Implementing Acts

No comments

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

Proposed change No. **A.3.1**

Respondent's view *

Although 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.

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

Proposed change No. A.4.1

Respondent's view *

"Although 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 "Whereis 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 RRMs 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 by the gas TSOs supported the Agency with developing the current schemas which have been approved by ACER after public consultation
- 2) Gas TSOs do 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/violation 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 ENTSG 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 *

Respondent's view *

The gas TSOs support aligning the possible currency values for Data field (17) CURRENCY.CODE of GASCAPACITYALLOCATION DOCUMENT with those accepted by REMIT table 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 4127 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 *

The gas TSOs support 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 *

The gas TSOs support the suggestion.

Proposed change No. A.4.5

Respondent's view *

The gas TSOs support the proposal.

Proposed change No. A.4.6

Respondent's view *

The gas TSOs support the proposal.

Proposed change No. A.4.7

Respondent's view *

The gas TSOs support the proposal.

Proposed change No. A.4.8

Respondent's view *

The gas TSOs support 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 *

The gas TSOs support the correction of the Edigas namespaces but suggests that this is based on input from Easeegas. ENTSG 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.

A.5 Proposed changes to fundamental data reporting

Proposed change No. A.5.1

Respondent's view *

The gas TSOs support the suggestion.

Proposed change No. A.5.2

Respondent's view *

The gas TSOs support 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 *

The gas TSOs support the correction of the Edigas namespaces but suggests that this is based on input from Easee-gas. ENTSG 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 *

The gas TSOs support ONLY the **extension** of allowed values. ENTSOG **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.internalAccountTso

externalAccountTso =

NominationMonitoring_Document.ConnectionPoint.Direction.Shipper_Account.externalAccountTso

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 *

The gas TSOs do not object to the change.

Proposed change No. [A.5.6]

The Agency proposes to introduce the specific field "IngFacilityOperatorIdentifier", placed within the element "IngUnavailabilityReport", which must reference the market participant whose reporting obligations are fulfilled with the reported "IngUnavailabilityReport".

Reason for the change

At the moment, the market participant whose reporting obligations are fulfilled with the particular report is not clearly identified.

Respondent's view *

GIE supports proposal A.5.6.

However we suggest a **change in the description of the related datafield** : Pursuant to Implementing Regulation (1348/2009) Art. 9, point 3, C on REMIT Regulation it is the LNG system operator, not the Market Participant's obligation to report planned and unplanned unavailability of the LNG facility.

Proposed change No. [A.5.7]

The Agency proposes to add two new accepted codes for market participant identifiers to the current identifiers, which will allow market participants to be identified with one of the following accepted values:

- the code "A01" for an ACER code (existing code)
- the code "LEI" for Legal Identifier Entity (existing code),
- the code "GLN/GS1" or Global Location Number (NEW code),
- the code "BIC" for Bank Identifier Code (NEW code),
- the code "EIC" for the Energy Identification Code (existing code).

Reason for the change

Other possible codes for the identification of market participants shall be accepted for the facilitation of data reporting. The introduction of additional codes will harmonise the codes for the identification of Market Participants used in other REMIT schemas.

Respondent's view *

GIE supports proposal A.5.7.

Proposed change No. [A.5.8]

The Agency proposes that in the REMITStorageSchema, storageFacilityReport the additional value "GRP" ("Storage group") is inserted among acceptable values for the "storageType" field.

Reason for the change

Each of the currently listed permitted storage types (DSR) (ASR) (ASF) (SGL) (PPC) (GHT) (SRC) cover only the identification of an individual storage facility. These cannot be used for the identification of a storage group. A storage group can be composed as a mix of different types of storage facilities. An example is a storage group called 'Basic underground storage' and is composed of three storage facilities that are grouped: Yela = Aquifer (ASR) + Marismas = depleted field (DSR) + Serrablo = depleted field (DSR). In order to be able to complete this field appropriately and identify storage group datasets the Agency proposes to introduce an additional storage type "GRP" (= Storage Group).

Respondent's view *

GIE supports proposal A.5.8.

However we would like to **request for additional ACER Guidance** :
Should the "GRP" additional value be introduced, in case reporting is done for a storage group that is composed of the same type of facility (for example storage group composed of only DSR facilities), the type reported could be "GRP" or "DSR" – both being correct. Which one is recommended to be used in this particular case?

Proposed solution:

Our suggestion is to use "GRP" for any type of storage group (composed of either different or same types of facility)

A.6 Proposed changes to inside information reporting

Proposed change No. **A.6.1**

Respondent's view *

The gas TSOs support the suggestion.

Proposed change No. **[A.6.2]**

The Agency proposes to change the accepted values of the Data Field (8b) Unit of measurement and to add a new unit "GWh/h" and remove the existing unit "mcm/d". Thus, the allowed units for gas UMMs will be: kWh/d, kWh/h, GWh/h, GWh, GWh/d, TWh.

Reason for the change

An alignment of units of measurement used for the reporting of gas storage and inside information will allow for consistent and unified reporting of data.

Respondent's view *

GIE supports proposal A.6.2. in relation to its role as RRM for fundamental data reporting for Storage and LNG, as this change does not affect the current fundamental data reporting by SSO and LSO.

However, we do not support the proposal and the reasoning behind it to remove "**mcm/d**" from the list of allowed values for the Data Field (8b) "Unit of measurement".

"mcm/d" is a valid unit for REMITTable 1, REMITTable 2. Furthermore, GASCAPACITYALLOCATIONS and NOMINATIONMONITORING schemas also allow the usage of unit for "million cubic meters per day".

With this regard, we think that from analysis and data matching perspective it would be reasonable to **keep "mcm/d"** as acceptable value for the Data Field (8b) "Unit of measurement".

Regarding the proposed reasoning for the change, we would like to state that the unavailabilities of the storage facilities are not the only cases that fall into the scope of events that shall be disclosed by the usage of UMM schema №2 "Unavailabilities of gas facilities". Thus, the effect from the alignment of the allowed units for the UMM Schema No 2 with those from the Gas Storage report would not be beneficial for all market participants and reporting parties.

Proposed change No. [A.6.3]

The Agency proposes to introduce the new accepted value "Storage facility unavailability" among the list of accepted values in the Data Field No (4/b) Type of Event.

Reason for the change

The current schema does not allow reporting the unavailability of the whole gas storage facility with just one UMM report. In order to report the unavailability of the whole gas storage facility market participants have to report three UMM reports: one UMM report with the Type of Event "Storage unavailability", one UMM report with the Type of Event "Injection unavailability" and one UMM report with the Type of Event "Withdrawal unavailability". The proposal limits the number of UMMs that market participants have to publish.

Respondent's view *

GIE supports proposal A.6.3.

Additionally, we would like to request for **additional ACER Guidance** to better define the definition of the scenario of "Storage facility unavailability".

The proposed datafield option does not support harmonisation across UMM and Fundamental Data.

Under FM, 1 message can be posted that contains 3 constituent fields for Storage, Injection and Withdrawal, moving to the same under the UMM schema would properly support a reduction in publications.

Further, using "storage unavailability" reduces the quality of information made available to the Market, as it masks the information needed to ascertain where the fault is, is it with the vessel or surface plant.

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

Proposed change No. **A.7.2**

Respondent's view *

The gas TSOs do 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]**

The Agency proposes that all mandatory schema elements that are of type string and have only maximal length defined have also minimal length=1.

Reason for the change

Following a good practice of the XML element/attribute definition.

Respondent's view *

GIE supports proposal A.7.6.

Proposed change No. **[A.7.7]**

The Agency consults on the approach to introduce validation rules on mandatory fields, where appropriate, see some examples in the Reason for the change below.

Reason for the change

As examples, it is expected that the elements

"Rights_MarketDocument/mRID", "Rights_MarketDocument/TimeSeries/mRID",

"PartyID" in Table 3

"GasCapacityAllocations_Document/identification",

"GasCapacityAllocations_Document/process_Transaction.identification",

"GasCapacityAllocations_Document/Transportation_Transaction/identification" in Table 4

"IngFacilityOperatorIdentifier", "ParticipantType" in REMIT LNG data reporting with mandatory cardinality also have an appropriate value.

This change would therefore enhance data quality for monitoring purposes.

Respondent's view *

GIE RRM supports proposal A.7.7.

GIE RRM also suggests that validation rules are discussed with the relevant stakeholders (LNG and Storage operators etc) before implementation.

Proposed change No. [A.7.8]

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 cancellations of previously reported records. Thus, the field for Action type will have the following possible values:

- New
- Modify
- Error
- Cancel

Reason for the change

Currently, it is not possible to update or to cancel the submitted LNG or GAS STORAGE files. The same lifecycle mechanism as for REMIT Table1 and REMIT Table2 will be applied.

Respondent's view *

GIE supports proposal A.7.8.

but suggests some alignment with the UMM schema for unavailability reporting

More specific information is provided in our Annex C response and additional Guidance is requested regarding lifecycle event treatment for unavailability reporting.

Proposed change No. [A.7.9]

The Agency proposes to align the units of measurement in the REMIT Storage and REMIT LNG schemas with the units for gas UMM reporting.

Current restrictions for REMIT Storage and REMIT LNG schema:

cm, cm/d, mcm, mcm/d, kWh, kWh/h, kWh/d, GW, GWh, GWh/h, GWh/d, MW, MWh, MWh/h, MWh/d, TWh, Therm/d, kTherm/d, MTherm/d, Therm, kTherm, MTherm, %.

The proposal is to limit the restrictions to

kWh/d, kWh/h, GWh/d, GWh, TWh, GWh/h.

Reason for the change

The alignment of units of measurement in REMIT Storage and LNG schemas with the units for UMM reporting will allow consistent and unified reporting.

Respondent's view *

GIE supports proposal A.7.9. in relation to its role as RRM for fundamental data reporting for Storage and LNG, as this change does not affect the current fundamental data reporting by SSO and LSO.

However, if the alignment is not also done with other schemas, data analysis on ACER's side would become difficult as conversion would be necessary (see also response to A.6.2).

Proposed change No. [A.8.1]

The Agency proposes that storage and LNG facilities (fields "storageFacilityIdentifier" and "lngFacilityIdentifier") are identified with EIC W and Z codes only. Currently, the schema allows the identification of facilities also with ACER and LEI codes. ACER and LEI identifiers should be removed from the facility identifiers.

Reason for the change

ACER and LEI identifiers should be removed because their purpose is to identify Market Participants and not assets.

Respondent's view *

GIE supports proposal A.8.1.

Proposed change No. A.8.2

Respondent's view *

The gas TSOs do 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 *

The gas TSOs 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	[REMITStorage] [REMITLNG]
Impacted field(s)	<p><modification in REMITStorageSchema_V2.xsd> <modification in REMITLNGSchema_V2.xsd></p> <p>simpleType "ActionTypesType" optional fields (N/M/E)</p>
Description of your change proposal/Other comment	<p>Add 'Cancel' optional field if required (see below): <xs:enumeration value="C"/> <!-- cancel --></p> <p><i>Reason : change proposal A.7.8. in Annex A is listing 4 options (N/M/E/C) and the XSD only contains three (N/M/E).</i></p>
Motivation for the change	<p>Following the implementation of the LifeCycle mechanism as for REMIT Table 1 and REMIT Table 2, lifecycle events would include : <i>The below listing is based on description under 3.2.10 in TRUM v3.0 page 28:</i></p> <p>a/ the <u>submission</u> of a new report, identified as '<u>new</u>' (N) b/ the <u>modification</u> of details of a previous report, identified as '<u>modify</u>' (M) c/ the <u>cancellation</u> of a wrongly submitted report, identified as '<u>error</u>' (E) d/ the <u>termination</u> of an existing report, identified as '<u>cancel</u>' (C)</p> <p>A/ Specific remark related to unavailability reporting</p> <p>Similar to UMMs, unavailability reports related to the same event may be updated several times before and during the event. Inside information publication and unavailability reporting may also require a prognosis, for example regarding the duration of the event.</p> <p>Typically, unavailability reports and UMM are covering the same event.</p> <p><u>For unavailability reporting</u>, some alignment with the UMMSchema (REMITUMMSchema_V2) seems applicable or logical, as this would enable to implement <u>threaded reporting</u>.</p> <p><u>1/ Use of unique identifier to enable threaded reporting</u></p> <p>To enable threaded reporting for unavailability reporting, similar as for UMM</p>

reporting, we can use the existing datafield **<reportingEntityReferenceID>** as unique identifier, having the same function as **<messageID>** in the UMM schema.

We can also support replacing **<reportingEntityReferenceID>** by **<messageID>**.

This datafield / unique identifier would then also have the same field restriction as in the UMM V2 schema and will be composed of:

- *25characters_3digits* to match the UMM MessageID composition.
- The first 25 characters are then to be kept identical for each report related to the same unavailability event.
- The last 3 digits are incremental and indicate the sequence of updates related to the same unavailability event.

2/ Use of ActionType status field to enable threaded reporting

Example

Based on currently suggested ACER Schemas V2, the lifecycle function could be set up like this (for unavailability reporting):

- **New report:** ActionType=N, unavailabilityEndFlag=Estimated, messageID=1234567890ABCDEFGHJKLMNO_001

- **Modification report:** ActionType=M, unavailabilityEndFlag=Estimated, messageID=1234567890ABCDEFGHJKLMNO_002

- **Closure of the event:** ActionType=M, unavailabilityEndFlag=Confirmed, messageID=1234567890ABCDEFGHJKLMNO_003

In case of error or cancelation: (report needs to be deleted):

ActionType=**C**, unavailabilityEndFlag=Confirmed, messageID=ABCDEFN123456GHIJKLM7890O_006

OR

ActionType=**E**, unavailabilityEndFlag=Confirmed, messageID=ABCDEFN123456GHIJKLM7890O_006

	<p>We would request additional Guidance on new procedures related to lifecycle event reporting for unavailability reports. Especially related to a cancellation (or error):</p> <p><i>In case of cancellation of an unavailability event :</i></p> <ul style="list-style-type: none"> - Should the <code>unavailabilityEndFlag</code> be indicated as 'confirmed' or 'estimated'? - Should <code>ActionType</code> "E" or "C" be used? ("Cancel" seems most logical) <p><i>Note that we only need three options (N/M/<u>E</u> or C)</i></p> <p>B/ Alternate approach for further alignment with UMM schema for unavailability reporting</p> <p><i>The above described approach is intended to keep schema changes minimal and would only require additional Guidance by ACER. An alternate approach is to align the unavailability reporting further with the UMM schema by using the <code><eventStatus></code> option fields "Active / Dismissed / Inactive".</i></p> <p><u>Potential removal of the <code><EndFlag></code> field</u></p> <p>Each unavailability is to be considered as having an estimated <code><unavailabilityEnd></code>, until the event is closed using the 'Inactive' event status.</p> <p><i>Implementation of the UMM lifecycle function to unavailability reporting thus has the additional benefit of enabling to remove <code><unavailabilityEndFlag></code> (Estimated / Confirmed end time).</i></p>
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Data type	[REMITStorage]
Impacted field(s)	<p><potential error in REMITStorageSchema_V2.xsd></p> <p>complexType "facilityType" should be indicated as sto:eic rather than lng:eic</p>
Description of your change proposal/Other comment	<p>Change line 208 :</p> <p><xs:element name="eicCode" type="lng:eic" minOccurs="1" maxOccurs="1"/></p> <p>to:</p> <p><xs:element name="eicCode" type="sto:eic" minOccurs="1" maxOccurs="1"/></p>
Motivation for the change	Storage facilities should be identified using the <u>sto:eic</u> complextype as defined in line 200.

Data type	[REMITStorage] [REMITLNG]
Impacted field(s)	1/ <reportingEntityReferenceID> 2/ <messageID> if the above described alignment with UMM schema would be implemented
Description of your change proposal/Other comment	Please <u>return</u> the reportingEntityReferenceID (or MessageID) in ACER Receipts to be able to improve our matching of the ACER Receipt with the original SSO/LSO report.
Motivation for the change	Currently, this datafield is <u>not</u> included in the ACER Receipt, <u>although it is stated as such in the ACER XML comment field</u> .

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	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

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. 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</p>

	<p>accepted. The goal 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.</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	Update the description of data field 34 to also include [kWh/d] as a capacity unit and

of your change proposal/Other comment	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	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). 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.



er comment	
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.