

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

**Proposed change No. \*A.1.1**

**Respondent's view**

We understand the aim of the Agency but we believe that the MPs should be facilitated when they have to report lifecycle events. Between the lifecycle events, it is a matter of fact that the novations that occurs for change in the corporate structure of one of the counterparties of deals executed on OMPs could be one of the most burdensome activities.

For this reason, our proposal should be to not allow the use of old version of the tables only for the report with action type NEW. For action type M, C and E the use of the old version of table one should be allowed.

**\* 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

## Proposed change No. \*A.1.3

### Respondent's view

In line of principle, we agree with the proposal to align REMIT and EMIR UTI but we believe that this alignment should not reduce the REMIT possibility to have a UTI code characterized by strong uniqueness. Whilst the harmonisation of REMIT and EMIR UTI formats may have been useful at the start of the REMIT reporting phase we question whether the proposed changes are particularly beneficial to most market participants now as most market participants will already have put in place systems and processes to generate UTIs based on the existing requirements and will be familiar with these. This is the reason why we disagree with the proposal to reduce the maximum length of the field from 100 to 52 character. At the same time, in order to allow the use of EMIR codes also for REMIT reporting, we would like to include in the list of allowed characters also ":" and ".".

Further, without any specific reference to the integration with EMIR, we would like to express our preference for a UTI that allows only the use of capital letter as it could simplify the sharing of the code between counterparties.

To avoid any misunderstanding, we would like to point out that the UTI rules should be the same both for table 1 and table 2 reporting and that no remediation procedure should be imposed to MPs on the trades already reported.

**\* 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

<b>Proposed change No. *A.1.4</b>
<b>Respondent's view</b> We agree with the proposal to remove the field 25 "Index Value" that in the TRUM document is presented with the name "Fixing index or reference price". At the same time we believe that should be maintained the possibility to report the so called simple index trade using table 1. For this reason field 36 "Index value" should be maintained to report the difference (+/-) from the fixing index value.

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

<b>Proposed change No. *A.1.5</b>
<b>Respondent's view</b> <p>Whilst we appreciate that some market participants may not be reporting the "Total notional contract quantity" field when they should, we suggest that ACER update its reporting guidance documentation to make clear to market participants that greater consideration should be given on whether this field should be reported by market participants. ACER recognises that there are incidences where contracts may not need to report this field and suggest, in these cases, that a mock value be provided. However, this may result in market participants providing differing mock values, potentially increasing confusion and inconsistencies in data reporting.</p>

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

**Proposed change No. \*A.2.1**

**Respondent's view**

We agree with the proposal

**\* 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

**Proposed change No. \*A.4.1**

**Respondent's view**

We agree with the proposal in general terms. We question whether the proposed changes are particularly beneficial to most market participants now as most market participants will already have put in place systems and processes to generate UTIs based on the existing requirements and will be familiar with these.

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

**Proposed change No. \*A.4.2**

**Respondent's view**

We agree with the proposal

**\* 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

**Proposed change No. \*A.4.3**

**Respondent's view**

We agree with the proposal

**\* 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

**Proposed change No. \*A.4.4**

**Respondent's view**

We agree with the proposal

**\* 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

**Proposed change No. \*A.4.5**

**Respondent's view**

We agree with the proposal

**\* 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

**Proposed change No. \*A.4.6**

**Respondent's view**

We agree with the proposal

**\* 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

**Proposed change No. \*A.4.7**

**Respondent's view**

We agree with the proposal

**\* 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

**Proposed change No. \*A.4.8**

**Respondent's view**

We agree with the proposal presented but also believe that the Agency should clarify if the platform PRISMA (where are recorded a huge number of transactions) is an OMP or not.

**\* 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

**Proposed change No. \*A.5.6**

**Respondent's view**

We welcome the proposal.

**\* 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

**Proposed change No. \*A.5.7**

**Respondent's view**

We welcome the proposal.

**\* 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

**Proposed change No. \*A.5.8**

**Respondent's view**

We welcome the proposal.

**\* 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

**Proposed change No. \*A.6.1**

**Respondent's view**

We welcome the proposal.

**\* 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

**Proposed change No. \*A.6.3**

**Respondent's view**

We welcome the proposal.

**\* 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

**Proposed change No. \*A.6.4**

**Respondent's view**

We agree with the proposal.

**\* 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

**Proposed change No. \*A.7.1**

**Respondent's view**

We agree with the proposal.

**\* 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

**Proposed change No. \*A.7.2**

**Respondent's view**

We agree with the proposal if the MPs remain allowed to use UTC format for the date and time (Zulu time reference).

**\* 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

**Proposed change No. \*A.7.3**

**Respondent's view**

We agree with the proposal.

**\* 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

**Proposed change No. \*A.7.4**

**Respondent's view**

We agree with the proposal.

**\* 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

**Proposed change No. \*A.7.5**

**Respondent's view**

We would appreciate greater clarification on the change being proposed. It is not clear what the section in parenthesis refers to.

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

**Proposed change No. \*A.7.8**

**Respondent's view**

We agree with the proposal.

**\* 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

**Proposed change No. \*A.8.1**

**Respondent's view**

We agree with the proposal.

**\* 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

**Proposed change No. \*A.8.3**

**Respondent's view**

We support the proposal and we would like to point out that the field should be replicable in order to allow the reporting also in case of multiple assets availability as described in proposals no. A.6.1 and A.6.4.

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

# Annex C- Form for providing additional changes and comments

<b>Data type</b>	Table 2
<b>Impacted field(s)</b>	<p>xsd schema</p> <p>Fields No (20) Notional quantity unit</p>
<b>Description of your change proposal/Other comment</b>	<p>Proposal A.1.1 for xsd schema</p> <p>Regarding fields 20:</p> <p>For TRUM document should clarify that natural gas trades the value of KWh is expressed at the temperature (usually 0° or 25°) stated in the contract.</p>
<b>Motivation for the change</b>	<p>With particular reference to the proposal A.1.1 we would like to underline that also for Table 2 it should be maintained the possibility for the MPs to report lifecycle events using the previous version of the format.</p> <p>Temperature is a relevant element for the conversion rate of natural gas</p>

<b>Data type</b>	Table 4
<b>Impacted field(s)</b> Field No (29) Procedure applicable	<p>Field No (16) Measure unit</p> <p>Fields No (18) Total price, (20) Reserve price, (21) Premium price</p> <p>Field No (29) Procedure applicable</p>
<b>Description of your change proposal/Other comment</b>	<p>For TRUM document should clarify that natural gas trades the value of KWh is expressed at the temperature (usually 0° or 25°) stated in the contract.</p> <p>Regarding fields n. 18, 20 and 21:</p>

	<p>We suggest the following values admitted:</p> <p>A01 = CFO, call for orders for assignment</p> <p>A02 = FCFS, first come first served for assignment</p> <p>A03 = OTC, Over the counter for assignment</p> <p>A04 = CFO_SUB, call for orders for subletting</p> <p>A05 = FCFS_SUB, call for orders for subletting</p> <p>A06 = OTC_SUB, call for orders for subletting</p> <p>The fields 18, 20 and 21 should have a proper field for the unit of measure that not only represents the capacity as it is now in the field 16 “Measure unit” but that also give the information if the price for that capacity is for day or for year.</p> <p>Hereafter some example of the possible units:</p> <p>€/kWh/h/d</p> <p>€/kWh/h/y</p> <p>GBX/ kWh/h/d</p> <p>GBX/kWh/h/y</p> <p>€/kWh/d/d</p> <p>€/kWh/d/y</p> <p>GBX/ kWh/d/d</p> <p>GBX/kWh/d/y</p>
Motivation for the change	<p>The procedure applicable (CFO, FCFS, OTS) is valid both for assignment and subletting.</p> <p>Referring to fields 18, 20 and 21:</p> <p>The information on the price that came from the combination of the fields 16 and 17 is not complete</p> <p>Regarding field 16: Temperature is a relevant element for the conversion rate of natural gas</p>