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

Proposed change No. A.4.1

Respondent's view *

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:

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.*

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 for improvements of the existing and currently used Edig@s based GasCapacityAllocation schema.

And introduces

4) Extra effort and costs for ALL Market Participants to build and maintain an extra interface.

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