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ACER – Agency for the Cooperation of Energy Regulators
Public Consultation Paper (PC_2014_R_02)

OPINION RELATED TO THE TRADE REPORTING USER MANUAL (TRUM)

First of all, a lot of thanks to ACER (Agency for the Cooperation of Energy Regulators) for
organising this very interesting public consultation.

This opinion represents an opinion of an individual citizen, not any legal entity.

This opinion does not contain:
— any business secrets
— any trade secrets
— any confidential information.

This opinion is public.

ACER can publish this opinion on a relevant web page.

Annex 2 holds information about disclaimers and copyright.

Best Regards,

signed electronically

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1. General: Previous consultations

I gave earlier opinions to ACER, and PDF files of those opinions are on the following addresses:

EN: Opinion 34: REMIT Registration Format
http://www.jukkarannila.fi/lausunnot.html#nro_34

EN: Opinion 43: Publication of extracts of the European register of market participants
http://www.jukkarannila.fi/lausunnot.html#nro_43

(REMIT: Pursuant to Article 9(3) of Regulation (EU) No 1227/2011 of the European Parliament
and of the Council of 25 October 2011 on wholesale energy market integrity and transparency)

SO, in this Opinion there should be some new insights related the publication of Trade Reporting
User Manual (TRUM).

2. General notes of the ARIS / The Agency’s REMIT Information System (ARIS)

There are several mentions about the ARIS, but the implementation of ARIS is somewhat unclear in
this phase. I have to reiterate again (cf. previous opinions) the maximum solution for the ARIS:

* ACER owns the machinery and processor of the information system (e.g. ARIS)
* the machinery and processor are based on relevant open standards
* the operating system is based on an open-source solution
* ACER owns the source code of the information system
* ACER owns the database of the information system
* the database is based on open-source solution and on relevant open standards.

Naturally ACER can use technologies, which are developed in an open environment, but these open
technologies can be the base for actual solutions with direct ownership.

ACER will most probably face a fierce resistance from several stakeholder
groups when/if ACER is demanding total ownership of the whole information
system, e.g. ARIS.

Therefore the technological implementation of a (new) ARIS should be totally controlled by ACER,
and the providers of different technologies should not create any technological lock-ins for ACER.
The data in ACER systems should be totally controlled by ACER in all phases of the life cycle of
the ACER systems.

3. Simple conception of information systems

The following figure gives us four basic functions: add, retrieve, change and remove. Then there are
databases and documents used in different systems. Users use different displays (interfaces).
Different systems need administration (e.g. maintenance) for keeping a system functional. Then

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there is communication (also standards) for direct and indirect usage of an information system.

4. Internal identifier / Field 0

There is some text about ACER code and other codes.
Field No 1 is following: “ID of the market participant or counterparty”.

There could be field No. 0, which could be following: “Internal ID for internal usage of the system.”
The internal ID will help in situations, when there is need to change information in other fields. The business of different communities can change; for example there can be mergers of different communities and/or a community can be divided to two “new” parts.

With the internal ID (Field No. 0) it is easier to handle situations in the form of different companies.

Proposal 1: There could be an internal identifier (Field No. 0) for the ARIS system.

5. Need for very detailed technical consultation?

There is mentioning on the consultation document of following issues:
- ACER Requirements for Registered Reporting Mechanisms (RRM)
- ACER Technical Specifications for Registered Reporting Mechanisms (RRM)

It can be concluded, that these two documents can be highly technical. However, there could be a consultation based on these technical documents, and the main target audience could be chief information officers in different stakeholder communities and/or specialist of information system
providers in different communities. In some communities, consulting information system providers (and subcontractors) of those communities may result need for highly detailed technical specifications.

Proposal 2: ACER could organise a technical consultation about ACER system(s) based on very detailed technical issues.

6. The number of needed standards and different standard versions?

ARIS has four tiers presented on the draft of “Trade Reporting User Manual (TRUM)”. In each tier, there are actually several other systems, which are connected to ARIS system. Therefore, the number of needed standards can be considerable, and the high level design is just a starting point for assessing needed standards and/or standardisation.

The previous figure is a conception if this situation: in reality there are several versions of different standards (Formats). Different standard (Formats) versions is a serious issue, when there are possibly tens of different systems cooperating with ACER systems.

Since different systems are layered, this means need for using several version of standards (formats)

7. Web feed (or news feed) / An example of two standards

One important feature to all modern systems is naturally providing different web feeds, check the symbol below.

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Web feeds can be used by several different systems, and the classification of systems can be based on several needs:

- different user classes
- daily feeds
- weekly feeds
- monthly feeds.

**Proposal 3:** ACER could create different web feeds (or news feed) based on the needs of different stakeholders.

ACER could provide different web feeds based on the current information needs after consulting different stakeholders.

One example is naturally, that there is Atom standard and RSS standard for web feeds. Some systems use Atom standard and some systems use RSS standard, and possibly ACER has to provide both feeds.

**Proposal 4:** ACER has to assess need for implementing RSS feeds in ACER systems.

**Proposal 5:** ACER has to assess need for implementing Atom feeds in ACER systems.

8. Other feeds / Possibly XML / An example of a standard / Another example: CSV

Then there is the question of creating other feeds based on XML.

**Proposal 6:** ACER could collect information about existing other XML feed formats, i.e. not only RSS feeds.

**Proposal 7:** ACER has to critically assess developing new XML feed formats.

One serious option is naturally transmitting CSV documents (Comma-separated values), since CSV usage (in and out) is implemented in several systems.

**Proposal 8:** ACER could collect information about CSV usage and/or CSV implementation in different stakeholder systems.

9. Checking standards developed by standard setting organisations (SDO)

There are hundreds of different standard setting organisations (SDO), and one comprehensive list is

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Proposal 9: ACER could systematically assess existing standard setting organisations (SDO) and assess standards provided by those communities.

Proposal 10: The number of redundant standardisation efforts should be minimal.

After serious assessment of standardisation landscape, the needed number of different standards is actually known as a verified fact. Depending on the situation, ACER can make a feasible and reasoned decision of standards, which could be used in ACER systems.

One option is participate in standardisation efforts, which can be donations to standardisation communities and/or participating in standardisation efforts. Actually participating in standardisation efforts means actually dedicating real work time and real workforce for standardisation.

10. Field 1 / TRUM

Proposal 11: The length of this field could be e.g. 50 alphanumerical characters, since some of the codes can be very long.

11. Field 23 / TRUM

Proposal 12: Should there be two fields:
1) Identifier for organised market place?
2) Actual identifier provided by market place?

Since these identifiers are provided by external communities, the nature of those external communities can change in time and space, e.g. mergers.

12. Field 26 / TRUM

The decision to use just one timestamp information (UTC time) is very good, since timezone information can be calculated based one timestamp information (UTC time).

13. Field 27 / TRUM

The length of this field not defined.

Proposal 13: Should this field definition be “Up to 52 alphanumerical digits”? One thing is, that there can be several versions of different contracts, even though contracts can be with the same name.

Proposal 14: Should there be a field for managing versions of different contracts?

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14. Fields 48 / TRUM

Most probably the examples should be in the following formats:

- 2014-01-29
- 2014-02-28
- 2014-03-31

15. Abbreviations / TRUM

Proposal 15: All abbreviations should be before actual text.

16. The need for replicated systems?

There is not much mentioning about replicating some ACER systems. The figure above tries to give an example of system replication. Since the retrieval is the mostly used function, possibly there can be replicated systems for retrieval, e.g. real-time search and archival search can be in different systems. Also add function can be e.g. realtime or daily.

Proposal 16: The need for replicated (ACER) systems has to be assessed seriously.

17. The need for brokered systems

One aspect is different brokered systems, which are usually “Trusted third parties”. E.g online

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shopping systems need a broker for transmitting actual payments from customers to sellers.

Possibly ACER systems are actual brokers, and different systems then rely on ACER systems as “Trusted third parties”. Possibly ACER systems has to use “broker systems”, which are needed for over-all functioning of ACER systems with different stakeholder groups.

Proposal 17: The number and nature of different broker systems has to be assessed carefully.

18. Concluding remarks

Developing new information systems are never easy, and ACER systems are not exceptions. Therefore there are always different possibilities for having serious problems with (new and old) information systems.

Like said before, using different experts in different phases of ACER system(s) development can result some success.

19. Good luck!!!

This opinion is quite limited. Hopefully there are constructive ideas presented in other opinions. This remains to be seen.
My opinions to the previous and relevant consultations – these consultations were mostly organised by the Commission of the European Union. General page to all consultations – both in English and in Finnish: http://www.jukkarannila.fi/lausunnot.html

EN: Opinion 1: Review of the rules on access to documents
http://www.jukkarannila.fi/lausunnot.html#nro_1

EN: Opinion 2: Schools for the 21st Century
http://www.jukkarannila.fi/lausunnot.html#nro_2

EN: Opinion 3: The future of pharmaceuticals for Human use in Europe - making Europe a Hub for Safe and Innovative medicines
http://www.jukkarannila.fi/lausunnot.html#nro_3

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders
http://www.jukkarannila.fi/lausunnot.html#nro_5

EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives
http://www.jukkarannila.fi/lausunnot.html#nro_6

EN: Opinion 8: European Interoperability Framework, version 2, draft
http://www.jukkarannila.fi/lausunnot.html#nro_8

http://www.jukkarannila.fi/lausunnot.html#nro_9

EN: Opinion 15: Collective Redress
http://www.jukkarannila.fi/lausunnot.html#nro_15

EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530
http://www.jukkarannila.fi/lausunnot.html#nro_17

EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft
http://www.jukkarannila.fi/lausunnot.html#nro_18

EN: Opinion 19: Official Acknowledgement by the Commission
http://www.jukkarannila.fi/lausunnot.html#nro_19

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EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
http://www.jukkarannila.fi/lausunnot.html#nro_20

EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
http://www.jukkarannila.fi/lausunnot.html#nro_21

EN: Opinion 23: Public consultation on the review of the European Standardisation System
http://www.jukkarannila.fi/lausunnot.html#nro_23

EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
http://www.jukkarannila.fi/lausunnot.html#nro_27

EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
http://www.jukkarannila.fi/lausunnot.html#nro_28

EN: Opinion 30: Internet Filtering
http://www.jukkarannila.fi/lausunnot.html#nro_30

NOTE: Organised by the European Committee for Standardization (CEN) 6

http://www.jukkarannila.fi/lausunnot.html#nro_32

EN: Opinion 34: REMIT Registration Format
http://www.jukkarannila.fi/lausunnot.html#nro_34

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EN: Opinion 35: Exploiting the employment potential of the personal and household services
http://www.jukkarannila.fi/lausunnot.html#nro_35

EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
http://www.jukkarannila.fi/lausunnot.html#nro_37

EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
http://www.jukkarannila.fi/lausunnot.html#nro_39

EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
http://www.jukkarannila.fi/lausunnot.html#nro_40

EN: Opinion 41: AT.39398: observations on the proposed commitments
http://www.jukkarannila.fi/lausunnot.html#nro_41

EN: Opinion 42: Opening up Education
http://www.jukkarannila.fi/lausunnot.html#nro_42


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EN: Opinion 43: Publication of extracts of the European register of market participants

http://www.jukkarannila.fi/lausunnot.html#nro_43

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EN: Opinion 44: Evaluation policy guidelines

http://www.jukkarannila.fi/lausunnot.html#nro_44

EN: Opinion 45: About ICT standardisation

http://www.jukkarannila.fi/lausunnot.html#nro_45

EN: Opinion 46: Review of the EU copyright rules

http://www.jukkarannila.fi/lausunnot.html#nro_46

EN: Opinion 51: European Area of Skills and Qualifications

http://www.jukkarannila.fi/lausunnot.html#nro_51

EN: Opinion 52: Trusted Cloud Europe Survey

http://www.jukkarannila.fi/lausunnot.html#nro_52

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Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three “old” parties were not traditionally as the three largest parties. The is now a “new” party as the third largest party. We all must remain being interested about this new development in Finland.

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