A2A Trading response to ACER “REMIT, List of organised market places“ PC_2014_R_07

A2A welcomes the possibility to express its opinions and some considerations about the list of organized market places.

Consultation questions
1. Please provide us with your comments on the draft list of organised market places. Do you see any omissions or errors in the list? Do you think that any organized market place or any information on organised market places is missing, that should be published in order to facilitate transaction reporting under REMIT? Please comment especially the potential organised market place status of those entities marked with an asterisk that had not registered themselves as organised market places at the time when this public consultation was launched. Please justify your reply.

We did not find in the Energy Exchange the Italian Derivative Energy Exchange (IDEX) of Borsa Italiana.

2. Virtual trading points (VTPs) are currently not included in the draft list of organized market places, unless they provide brokering services or are considered as an energy exchange. Do you agree with this approach? If not, please justify your reply.

Yes we agree.

3. For the reasons stated above (see point 1. in paragraph 4 of this consultation paper), the Agency currently believes that primary auction platforms for transportation contracts do not have to be listed as organised market places. Do you agree with this approach? Please justify your reply.

Yes we agree. Nevertheless we saw that the energy spot markets are included in the list also if they are doing the same type of allocation (SMP) and report all the information directly to RRM.

4. The final list of organised market places is supposed to include organised market place IDs for the purpose of facilitating transaction reporting under REMIT. Do you agree that the list of
organised market places should make this information publicly available? If not, please justify your reply.

Yes we agree and we do not see any reason for not having IDs public.

5. The list of organised market places is supposed to be updated in a timely manner. The Agency is currently intending to update the list on a regular basis as and when required, in particular as and when the Agency is given further information on gaps. Do you agree with this approach? If not, please justify your reply.

Yes we agree on the principle to update it but it could be more efficient to define a fix period (for example only the first of the month) in order to avoid to miss any modification.

Best Regards

A2A Trading srl

P.S. Please note that A2A Trading is an Italian company and not a UK company as reported in the list of respondent.
Thank you