

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.

HUPX/CEEGEX exchanges comment:

With regard to the provided list of the OMPs respectively to HUPX and CEEGEX we do not see any errors, however we would like to stress that for the other companies listed we cannot give any kind of evaluation.

As for the question related to the potential OMPs that have not registered yet themselves as OMPs, but are included in the list, we have 2 comments. From the market participants point of view, would be advisable to indicate the time when the listed companies with asterisk will become fully registered OMPs, that would actually help the market participants to see when the registration will be completed. This would give a more transparent, equal and non-discriminatory opportunities for the companies listed.

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.

HUPX/CEEGEX exchanges comment:

Yes, we agree with the approach.

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.

HUPX/CEEGEX exchanges comment:

Yes, we agree with the statement, not to include primary auction platforms for transportation contracts in the list. We consider that the distinction between standard and non-standard contracts does not apply to transportation contracts.

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.

HUPX/CEEGEX exchanges comment:

Due to the fact that the OMPs that would apply for an RRM status and that status will be granted by ACER, a potential ACER code or RRM code can be listed alongside the names of

the OMPs that are actually ACER certified RRMS. However we consider that that MIC code might be actually sufficient.

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.

HUPX/CEEGEX exchanges comment:

We consider that the list should be updated on any changes related to any of the OMPs listed, that would provide any additional information to the market participants, i.e. whether the OMPs status granted, new OMPs entrants on the list etc.