



ENTSOLOG response to ACER public consultation “on the
Common Schema for the Disclosure of Inside Information”
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Introduction

ACER issued on 27th May 2015 the public consultation paper “on the Common Schema for the Disclosure of Inside Information” by market participants under the obligation of Article 4 of REMIT.

The consultation paper is providing recommendations on a common minimum standard necessary to ensure fair, effective and transparent communication of information that is likely to significantly affect wholesale energy prices.

The public consultation is intended to collect the views on the proposed common schema from all parties interested in the implementation of REMIT (market participants, platforms for the disclosure of inside information, new service providers, etc.).

ENTSOLOG welcomes the opportunity to respond to ACER’s public consultation through the following answers.

ENTSOLOG Response

As a general remark ENTSOLOG considers that the use of only one message for the gas industry (“*UMM related to capacity change – gas*”) is more efficient from a data exchange and IT perspective.

Then ENTSOLOG would like to propose to change all fields not mentioned in the list of fields for “*UMM related to other type of inside information*” in the list of fields “*UMM related to capacity change – gas*” to “*optional*”.

- 1. Would you add any other field not included in the current proposal? If so, please explain your reasoning.**

ENTSOLOG considers that there isn’t need of additional fields in ACER proposal.

2. Would you remove any field represented in the current proposal? If so, please explain your reasoning.

- Field No 14 "*Decision time*": should be deleted. The field doesn't provide additional or meaningful information for the market. Moreover in case of unplanned events, outages or IT failures there is no decision consequently and the decision time can't be mentioned. The decision process in large companies can be very complex. The need to determine the decision time exactly creates a lot of administrative burden and bureaucracy.
- Field No 20 "*Impact on emission allowance prices*": should be deleted. From TSOs' point of view the evaluation would be difficult and could create misleading sign to the market. Then to avoid misleading information the field wouldn't be used in general.

3. Would you change any of the descriptions, accepted values or applicability? If so, please explain your reasoning. Are the schemas or values that you are suggesting based on any industry standard? Which one(s)?

- Field No 2 "*Update ID*": referring to line 4 of pag.10 of the ACER document, ENTSOG would like to comment that the example is not appropriate for the natural gas market because it's not possible that an unplanned outage become a planned outage. Indeed there is a clear rule in the Chapter 3, Annex I of Reg.715/2009 [Art. 3.3.1 (g)]: everything that is known 42 days in advance has to be considered as planned and every measures known shorter than 42 days in advance has to be considered as unplanned;
- Field No 4/b "*Message type*": should contain also the choice "*Other*" because it is not possible to standardize ex ante any possible event affecting wholesale energy price. The Field No 17 "*Remarks*" will be used for the explanation of the event.

In addition there are further events, not mentioned in the list of accepted values, like:

- technical problems in IT-systems of booking capacity platforms;
- technical problems in IT-systems of TSOs;
- etc.
- Field No 10/b "*Unavailable Capacity*": should be optional. In many cases the exact value or even an estimate can't be given in case of an unplanned event. Furthermore outages of platforms or IT failures in TSOs' backend systems can't be expressed in a concrete number of "*Unavailable Capacity*". In addition ENTSOG prefers to use as measurement unit the "*kWh/d*" or "*kWh/h*" instead of "*MWh/d*" as stated in Art.10 of CAM NC;
- Field No 11/b "*Available Capacity*": should be optional. Please refer to the above mentioned field "*Unavailable Capacity*". In addition ENTSOG prefers to use as measurement unit the "*kWh/d*" or "*kWh/h*" instead of "*MWh/d*" as stated in Art.10 of CAM NC;
- Field No 12/b "*Nominal Capacity*": should be optional and renamed as "*Technical Capacity*". The TSOs consider the "*Nominal Capacity*" as the technical available capacity. In addition ENTSOG prefers to use as measurement unit the "*kWh/d*" or "*kWh/h*" instead of "*MWh/d*" as stated in Art.10 of CAM NC;
- Field No 16 "*Event stop*": should be optional or provide possibility to publish "*unknown*". In many cases a valid estimation for the end of an event cannot be given;
- Field No 17 "*Remarks*": the field should be renamed as "*UMM description*"

4. Do you agree with the use of RSS or ATOM feeds to fulfill the requirement under Article 10(1) of the REMIT Implementing Regulation?

ENTSOG agrees with the proposal and considers that it's not necessary to offer both solutions together.