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To : ACER

Your ref./Dated
o o o o o / o o o o o

Our ref.
5772/2015

Contact
[REDACTED]

Date
23.6.2015

Common Schema for the Disclosure of Inside Information - response

Dear Madam/ Sir,

by means of the Consultation Paper on the „Common Schema for the Disclosure of Inside Information“ issued on 27th May 2015 ACER proposes a common set of data fields and recommendations on a common standard in order to ensure transparent and effective information communication which could affect wholesale energy prices.

As a general remark, eustream, a.s. considers that the scope of required inside information is full-range, understandable imposing just a little administrative burden to reach a target to provide users with transparent information in an efficient manner.

However, the company eustream a.s. reviewed this proposal being ready to share some ideas for changes :

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

Our opinion is that it is not necessary to add any other fields into the ACER proposal.

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

Nevertheless, eustream,a.s. thinks that some fields should be deleted :

- Field No. 6./b Affected Asset (gas capacity) – this field could be confusing for users without getting more excessive explanation.
- Field No.14 Decision time – this field does not provide a market with meaningful information
- Field No. 20 Impact on emission allowance price – evaluation of impact on emission allowance price could be pretty difficult and could be misleading for the gas market

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 – this field is considered as an inappropriate field as it is impossible that an unplanned outage could become a planned outage.
- Field No. 12/b Nominal capacity – should be optional and renamed as „Technical Capacity“ as the nominal capacity is considered as technically available capacity.

We consider that remaining fields could provide complex and fruitful information for taking relevant precautions at the wholesale energy market by all involved parties.

Eustream, a.s. agrees that RSS web feed fulfilling the requirement under the Article 10 (1) of the REMIT Implementation Regulation plays a role of a user friendly tool without a special administrative burden.

Finally, we really appreciate the effort of ACER to prepare a transparent and reasonable information platform.

Best regards,

eustream, a.s.

