ACER

European Union Agency for the Cooperation
of Energy Regulators

2023 Joint roundtable meeting with AEMPs, OMPs and RRMs

15 November 2023 from 09:30 to 12:45

Microsoft Teams session

MINUTES

(CHATHAM HOUSE RULE, NO NAMES IN QUOTES DURING THE MEETING)

Represented institutions	Remarks
ACER, MIT Department	
42 Financial Services	
Amprion GmbH	
Austrian Power Grid AG	
Balkan Gas Hub EAD | Bulgartransgaz	
bayernets GmbH	
BORZEN, operater trga z elektriko, d. o. o.	
EFET (European Federation of Energy Traders)	
ELIA TRANSMISSION BELGIUM NV	
ENI S.P.A.	
ENTSO-E	
ENTSOG	
EPEX SPOT SE	
Equias B.V.	
ETPA B.V.	
Eurelectric	
European Energy Exchange AG Regulated Market	
Europex	
Fluxys Belgium	
Gas Infrastructure Europe (GIE)	
GAZ-SYSTEM S.A.	
Gestore dei mercati energetici spa (GME)	

🌐 acer.europa.eu   ✉ remit.roundtable@acer.europa.eu   📞 +386 8 2053 400

GRTgaz Deutschland GmbH	
HENEX SA	
HUPX Ltd.	
ICE Futures Europe	
Independent Bulgarian Energy Exchange	
Independent Power Transmission Operator	
IOGP – International Association of Oil & Gas Producers	
LEBA	
Marex Spectron Europe Limited	
MIBGAS	
Nasdaq Stockholm AB	
National Grid Interconnectors Limited	
Nord Pool	
OKTE, a.s.	
OMIP - Pólo Português, S.G.M.R., S.A.	
OMI-Polo Español S.A. (OMIE)	
ONTRAS Gastransport GmbH	
Open Grid Europe GmbH	
OTE, a.s.	
PLINOVODI, Družba za upravljanje s prenosnim sistemom, d.o.o.	
Polskie Sieci Elektroenergetyczne Spółka Akcyjna	
PRISMA European Capacity Platform GmbH	
PUBLIC GAS CORPORATION OF GREECE (DEPA) S.A.	
SEEBURGER AG	
Solien, s.r.o.	
Towarowa Giełda Energii S.A.	
UAB GET Baltic	
vp Energieportfolio	
Webware Internet Solutions GmbH	

ACM	Observer
CNMC	Observer
E-CONTROL	Observer

WELCOME AND OPENING

After the welcome address and the introduction of the chair, the agenda of the meeting was approved.

1. UPDATE ON DATA REPORTING

1.1 Latest updates on ARIS

ACER commenced the session with a comprehensive update on the current ARIS status, highlighting the increased pressure determined by the exponential growth in data volume in the first three quarters of the year. The continuous expansion in data load has posed challenges to the existing systems, necessitating constant scaling up and capacity enhancement measures. ACER acknowledged the decline in availability numbers from the previously reported 99% plus, but stressed that it has not reached critical levels. This decline is directly associated with the increased pressure stemming from the influx of additional data.

In detailing recent ARIS deployments, ACER showcased a diverse array of enhancements and updates since the last roundtable meeting. Emphasis was placed on the need to fortify and optimise system performance to accommodate the mounting load effectively.

Transitioning to specific system enhancements, ACER outlined ongoing efforts to address challenges in data collection. One notable initiative is the deployment of microservices for parallel processing. Additionally, the optimisation of data structure and database enhancements were discussed as strategies to streamline the handling of increased data flow.

The VPN initiative was a focal point of discussion, aiming to enhance the security of connections with Registered Reporting Mechanisms (RRMs), ACER reiterated its commitment to this and other possible future security enhancements. RRMs failing to establish a working VPN connection were warned of non-compliance with technical specifications, potentially leading to the inability to submit data.

The floor was then opened to stakeholder questions, with notable concerns raised about delays in VPN connection support from ACER. In response, ACER assured stakeholders that

the technical team is actively engaged in connecting RRMs. Acknowledging the end-of-year surge in demand, ACER emphasised the need for prompt initiation of the connection process.

ACER reiterated the communicated schedule for VPN connection and confirmed that over 50% of RRMs are successfully connected. Stakeholders were encouraged to follow the established channel through ACER Service Desk (CSD servicedesk@support.acer-remit.eu) for VPN connections.

1.2 Latest updates on data collection

ACER commenced the session by providing an update on data reporting. The key highlights included the introduction of new data reporting formats. The data growth this year, influenced by both market events and changes in reporting, was highlighted as a distinguishing factor.

The focus then shifted to changes in electronic formats, emphasising the discontinuation of outdated versions. For REMITTable1 Version 2 will be discontinued on 15 January 2024, leaving Version 3 as the sole valid version. A similar approach was discussed for REMITTable4, with Version 2 set for retirement on 15 December 2023. RRMs were urged to transition to the latest electronic formats.

ACER presented updates on the number of RRMs, and records in Tables 1, 2, 3, and 4. While the number of RRMs remained stable, an increase in the number of registered market participants was noted. The surge in the number of records received, especially in Table 1 and 2, raised questions about market-driven factors versus technological considerations. ACER expressed commitment to scrutinising the influx for a comprehensive understanding.

ACER highlighted concerns about RRMs duplicating contracts, leading to increased data volume and processing challenges. Emphasis was placed on adhering to reporting requirements to ensure smooth data processing.

The presentation concluded with an overview of lifecycle events for Table 1, addressing new, modified, cancelled orders, and errors. ACER shared a live survey to collect feedback on reactivating a validation rule related to transaction timestamps, aiming to implement it by the end of the week.

The floor was opened for feedback on the proposed rule reactivation, urging RRMs and organised market places to provide immediate input or take the matter back to their companies for further consideration.

2. UPDATE ON DATA QUALITY

During this segment of the meeting, ACER provided a comprehensive update on the progresses made in data quality and the utilisation of the data reported under Regulation (EU) No 1227/2011 (REMIT). The presentation emphasised not only the importance of data quality but also the evolving understanding of how the submitted data is used. The collaborative efforts have resulted in enhanced surveillance capabilities, reflecting the commitment of all stakeholders. Notably, ACER has been actively sharing data with the European Commission services and academia, as well as using REMIT data to a greater extent within ACER, contributing to reports such as the ACER Market Monitoring Report. ACER expressed confidence in using data in aggregated forms, underscoring the significance of this progress.

In addition, ACER touched upon the establishment of a dedicated data quality management and supervision process. As part of this process, ACER reaches out to stakeholders upon the identification of data quality issues. Stakeholders, including market participants, RRMs and OMPs, have actively participated in this ongoing dialogue, contributing to the effectiveness of the data quality management process and resolution of data quality issues.

ACER has also delved into understanding how the Urgent Market Messages (UMMs) and fundamental data can be linked, showcasing a commitment to gaining a comprehensive understanding of all reported data sets under REMIT.

While acknowledging the achievements, the meeting also shed light on persistent challenges. Despite advancements, certain data quality issues persist, indicating that some reporting practices are deeply ingrained and challenging to change. Another challenge discussed was the accountability and responsibility in the reporting chain. The complexity of tracing the root cause of data quality issues was emphasised.

ACER recognised limitations in dealing with more complex structured products (like options on spreads) and trading methods. Despite the challenges, ACER expressed hope and anticipation for positive changes in the upcoming revision of the REMIT data reporting framework.

A stakeholder raised pertinent concerns regarding the power dynamics related to data quality issues. The central issue highlighted was that in certain situations the control over the data quality of reported data is scattered along the reporting chain. The discussion emphasised the need for increased awareness across all stakeholders and a shared understanding of how to address data quality issues collectively.

ACER acknowledged the challenges raised by the stakeholder and recognised the limitations in the current framework. While understanding that ACER may not have direct power in certain situations, there was a call for increased awareness and information sharing.

The discussion concluded with a reminder of the ongoing collaboration required to address data quality challenges effectively. Stakeholders were encouraged to maintain open lines of communication and to contact ACER proactively with any issues or concerns. The importance of early detection and resolution of data quality issues was reiterated as a shared responsibility among all stakeholders. The meeting emphasised the need for a collective commitment to improving data quality standards under REMIT.

3.   GUIDANCE ON TRANSACTION REPORTING

The discussion focused on the content of the proposed updates of the REMIT transaction reporting guidance, which had been shared with stakeholders well in advance of the meeting. ACER thanked all contributors for their valuable input received via the written consultation and indicated the addressing of the received feedback would be the primary goal of this agenda item. ACER also explained that the feedback received via the written consultation and during the meeting would be addressed in the second version of the draft documents, which would be shared with the stakeholders after its consolidation.

The discussion touched on the proposed solution to report local flexibility products, the improvement of the reporting of Power Purchase Agreements under REMIT, the new Annex VIII to the Transaction Reporting Manual (TRUM) on reporting LNG supply contracts, and the reporting of capacity conversion from unbundled to bundled capacity and the transformation of interruptible to firm capacity in relation to gas transportation contracts. Furthermore, the proposed amendments of certain data fields (such as Data Field (36) Index value in Table 1 and the Total notional contract quantity field in Table 1 and 2) which had been introduced in the TRUM were discussed. In addition, proposed updates introduced in other annexes to the TRUM were discussed, such as Annex II (Examples of transaction reporting), Annex IV (Guidance on UTI), Annex VI (Additional information on how to correctly report the Delivery point or zone). Also, the new and updated FAQs in the Frequently Asked Questions on REMIT transaction reporting (FAQ document) were briefly discussed.

With regard to the proposed extended usage of the Extra field available in the electronic formats and the usage of prefixes in the UTI and Contract ID field, ACER explained that based on the written consultation, stakeholders had shown concern about these proposals. During the meeting, stakeholders also voiced concerns about the burden on reporting parties brought on by the complexities associated with the proposals and expressed their preference for ACER to implement schema related changes or to wait until the potential future revision of the REMIT Implementing Regulation (EU) No 1348/2014, which might bring the possibility to amend the current data reporting framework. Stakeholders highlighted the need for solutions that seamlessly integrate with the existing reporting systems and ensure a smooth transition without undue IT burden. Nevertheless, stakeholders acknowledged ACER's need for additional information. ACER expressed its understanding of the stakeholders' concerns and its commitment to follow up on the proposed alternative solutions in order to minimise

disruptions in the existing reporting practices. ACER also asked the reporting parties for continued collaboration in case the proposed potential amendments are introduced in the current electronic format.

Further discussions revolved around the implementation aspects of the proposed solutions.

Some concerns were raised about the increased complexity in the UTI generator logic that could potentially be brought on by the proposed solution to add prefixes to the UTI/Contract ID. Stakeholders stressed that the proposed solutions would further complicate the generation of matching UTIs for the counterparties of bilateral trades. It was also highlighted that in case the proposed new wording remains, and a prefix requirement must be added for certain types of transactions, more detailed guidance would be required on how both sides of a bilateral trade need to assign a unique transaction ID in general.

There were also questions about the fixing index and the update frequency of EIC codes for the reporting of delivery points or zones listed in ACER's List of Accepted EICs and more specifically when a request for inclusion of new EIC in the list does not come directly from a TSO. It was noted that currently Annex VI of TRUM does not provide any reference to the VTPs but at the same time, the List of Accepted EICs contains a number of VTP identifiers. Stakeholders mentioned as potentially problematic for the consistency of the reported data the instances of simultaneous acceptance by the List of EIC of a Balancing zone and EIC of the VTP within the same zone. Stakeholders expressed concerns about delays in the EIC code updates and proposed a proactive collaboration between ACER and TSOs considering the update of the List of Accepted EICs when new codes and information for commissioning of new infrastructure objects (IPs, cross-border points, storage facility, LNG facility, connection point between storage/LNG facility and transmission system etc.) are known in advance. EICs. Stakeholders shared examples of discrepancies in the reporting practices, emphasising the need for coordinated efforts to rectify such issues. Further discussion touched on the validity of Virtual Trading Point (VTP) codes representing balancing zones. ACER and TSOs agreed to collaborate, particularly in regards to the alignment of the EICs listed in the List of Accepted

In conclusion, ACER indicated that the concerns and proposals raised during the meeting would be duly taken into consideration. Stakeholders were encouraged to continue providing feedback through the designated channels in order to foster an ongoing collaborative dialogue between ACER and its stakeholders.

4. DISCUSSION ON ISSUES OF MUTUAL INTEREST TO STAKEHOLDERS (TO BE PROVIDED BY MEETING PARTICIPANTS IN ADVANCE OF THE MEETING)

The session commenced with an ACER presentation, which focused on the application of the RRM Requirement 5.7 (Requirements on the validation of output). ACER sought the opinions of RRMs and other stakeholders regarding their experiences in the application of this requirement. The discussion aimed to gather insights into the implementation of this requirement by RRMs and into how market participants validate the data reported on their behalf.

Representatives from stakeholder organisations talked about the various mechanisms in place for data access and validation. They discussed different possibilities, such as querying data through user interfaces, automated interfaces for receipt retrieval, and providing copies of files to market participants. Different avenues, including web applications and activity reports, were highlighted as a means for market participants to track and manage their data.

Some concerns were raised about the variations in file structures among RRMs, leading to a discussion on how RRMs share data. It was clarified that while some RRMs send separate files for each market participant, others combine multiple participants' data into one file. The importance of ensuring that market participants receive only their relevant data (reported files on behalf of the relevant market participant and ACER return receipts for the reports submitted by the RRMs on behalf of the relevant market participant) was emphasised.

The discussion then shifted to the handling of invalid receipts. RRMs described mechanisms for immediate alerts and ticketing systems to address errors. Also highlighted was the need for standardised file formats to facilitate data interpretation, particularly in cases where different files contain varying data fields.

A stakeholder shared a presentation on a proposal to make VAT information visible in the CEREMP public register, in order to align with the existing REMIT regulation.

In response to this proposal, stakeholders indicated positive support. A stakeholder emphasised that the data was already public but dispersed across different registers.

ACER acknowledged the proposal and indicated it would have to run a formal consultation to gather feedback from market participants, as it involves making changes to the current publication and due to legal considerations.

The meeting concluded with ACER thanking the participants for providing valuable insights. The proposal regarding VAT information visibility was noted for inclusion in future

consultations, and ACER reiterated its commitment to ensuring an inclusive and consultative approach for any potential changes.

5.   AOB

No other business to discuss.