


ACER

 Agency for the Cooperation
of Energy Regulators

RRM Requirements

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**REMIT public workshop on REMIT implementation
Ljubljana, 16 July 2014**

- Process
- Draft Implementing Acts
- Short Overview of registration process
- ACER assessment of compliance

- PC on RRM / RIS guidelines (spring 2013)
- Roundtables with stakeholders (second half of 2013)
- Roundtables with 3rd party RRM and MPs (May 2014)
- Roundtables with OMPs and 3rd party RRM (July 2014)
- Ongoing discussions with ENTSOs and TSOs
- PC on RRM requirements (July–August 2014)
- Adoption of RRM requirements and finalisation of technical specifications document (in parallel with IAs)

Article 11

Technical and organisational requirements and responsibility for reporting data

1) In order to ensure efficient, effective and safe exchange and handling of information the Agency shall after consulting reporting parties develop technical and organisational requirements for submitting data.

The requirements shall foresee mechanisms:

- a) to ensure the security, confidentiality and completeness of information,*
- b) to identify and correct errors in data reports,*
- c) to authenticate the source of information,*
- d) to ensure business continuity.*

2) The Agency shall assess whether reporting parties comply with the requirements. Reporting parties who comply with the requirements shall be registered by the Agency. Entities listed under the first subparagraph of Article 6(5) shall not be subject to requirements under this Article.

Hierarchy of REMIT rules

1st level

REMIT

2nd level



REMIT Implementing Acts (IAs)
on the basis of Article 8 of REMIT

3rd level



**Requirements for the registration of RRM
(Trade and Fundamental data)**

Technical Specifications for RRM

Transaction Reporting User Manual
(TRUM)

Manual of Procedures on Fundamental
Data Reporting

Article 11

Technical and organisational requirements and responsibility for reporting data

3) Persons required to report data referred in Articles 6, 8 and 9 shall have responsibility for the completeness, accuracy and timely submission of data to the Agency and, where required so, to national regulatory authorities.

By way of derogation from that responsibility, where a person referred in the first subparagraph reports those data through a third party the person shall not be responsible for failures in the completeness, accuracy or timely submission of the data which are attributable to the third party. In those cases the third party shall be responsible for those failures.

Persons referred in the first subparagraph shall nevertheless take reasonable steps to verify the completeness, accuracy and timeliness of the data which they submit through third parties.

Who shall register?

Any entity reporting trade and / or fundamental data to ACER:

- Market participants
 - Organised market places
 - Third parties reporting on behalf of the above entities
 - Trade repositories
 - Approved reporting mechanisms
 - ENTSOs
 - TSOs
 - LSOs
 - SSOs
- } simplified registration process?

However, Article 6(10) draft Implementing Acts:

In relation to the reporting of information referred to in this article, the Agency shall, after consulting the reporting parties concerned, define electronic formats for the submission of information [...]

Overview of registration process

IDENTIFICATION

- MPs - CEREMP
- Others – online identification form (similar to Sec. 1 &2 of MPs form)
- ACER verifies identity and issues credentials

TECHNICAL SPECS

- Login with ACER's credentials
- Online signature of NDA
- Download technical specs

ATTESTATION

- Attestation of fulfilment of requirements on security and timely transmission, input validation, output content, format & validation, governance, operational reliability
- Undertaking to comply with other requirements

TESTING

- Reporting of data using test environment
- Successful reporting of a certain % of transactions per data type

REGISTRATION

- Credentials for access to production environment issued
- Registration process completed
- Reporting of data to production environment

- Internal policies, processes, mechanisms proving compliance with the requirements must be documented
- ACER can request information at any stage
- ACER can consult NRAs / other authorities
- ACER may request compliance report OR renewal of registration – certified by external auditor based on ACER's audit plan
- ACER may discontinue access to ARIS after warning RRM – associated MPs informed

- Attestation phase of registration process
- Technical description of reporting process

Registration – Attestation that requirements are met / 1

SECURE TRANSMISSION

- Mechanism to ensure secure transmission of information to ACER, including:
 - Non- repudiation
 - Minimise risk of data corruption, unauthorised access and leakages during transmission

TIMELY TRANSMISSION

- Mechanism to ensure transmission within the deadlines indicated in IAs
- Business continuity mechanisms to ensure timely transmission in case of incidents

VALIDATION OF INPUT

- Guarantee certainty of:
 - Source of information created or collected by the RRM
 - Proper authorisation of person submitting info on behalf of MP
- No significant risk of corruption in input process
- Check transactions reports for completeness, identify omissions and obvious errors, request and / or initiate re-transmission of any such erroneous or missing reports

OUTPUT FORMAT

- Ability to report data in format defined by ACER
- Commitment to adapt the reporting processes as required by ACER (e.g. format updates, data quality improvement, etc.)

OUTPUT CONTENT

- The report must contain information prescribed in the Implementing Acts

OUTPUT VALIDATION

- Possibility for MPs to receive information on what data was reported and on the outcome of the reporting process.

Registration – Attestation that requirements are met / 3

GOVERNANCE

- Internal control mechanisms
- Transparent and consistent lines of responsibility
- Sound administrative and accounting procedures
- Robust compliance programme (controls over regulatory requirements and conflict of interest)
- Outsourcing arrangement(s) in compliance with the requirements

OPERATIONAL RELIABILITY

- Operational risk policy or framework which:
 - inventories the potential operational and regulatory risk the RRM may encounter
 - describes the policies for mitigating any operational risk in an efficient and effective manner

DISRUPTION

- Undertaking to inform ACER without delay if operations are disrupted
- Undertaking to provide ACER within 5 working days with a report on the reasons for disruption and actions taken to prevent future incidents
- Ability to demonstrate that no information was unreported or lost

SECURITY BREACH

- Undertaking to immediately notify ACER of the breach
- Undertaking to provide ACER within 5 working days with a report on the reasons for security breach and actions taken to prevent future incidents

CONTACT PERSONS

- Provide ACER with names and contact details of staff in charge of assisting ACER with its regulatory responsibilities
- Undertaking to timely update such contact details

Registration – Undertakings / 2

RESPONSE TO ACER REQUEST

- Undertaking to timely reply to ACER's requests for clarification concerning application and / or operation of the RRM
- Undertaking to provide information / evidence ACER may request concerning application and / or operation of the RRM

ONGOING COMPLIANCE

- Undertaking to meet requirements at all time

- Reporting entity is a legal or natural person that submits data to ARIS
- Reporting entity can act on its own behalf or on behalf of another legal or natural person
- Every reporting entity has to be registered with ACER
- Every reporting entity has to fulfill certain requirements to ensure proper submission of data
- Reporting entity will receive electronic receipt signed by ACER for any data submitted

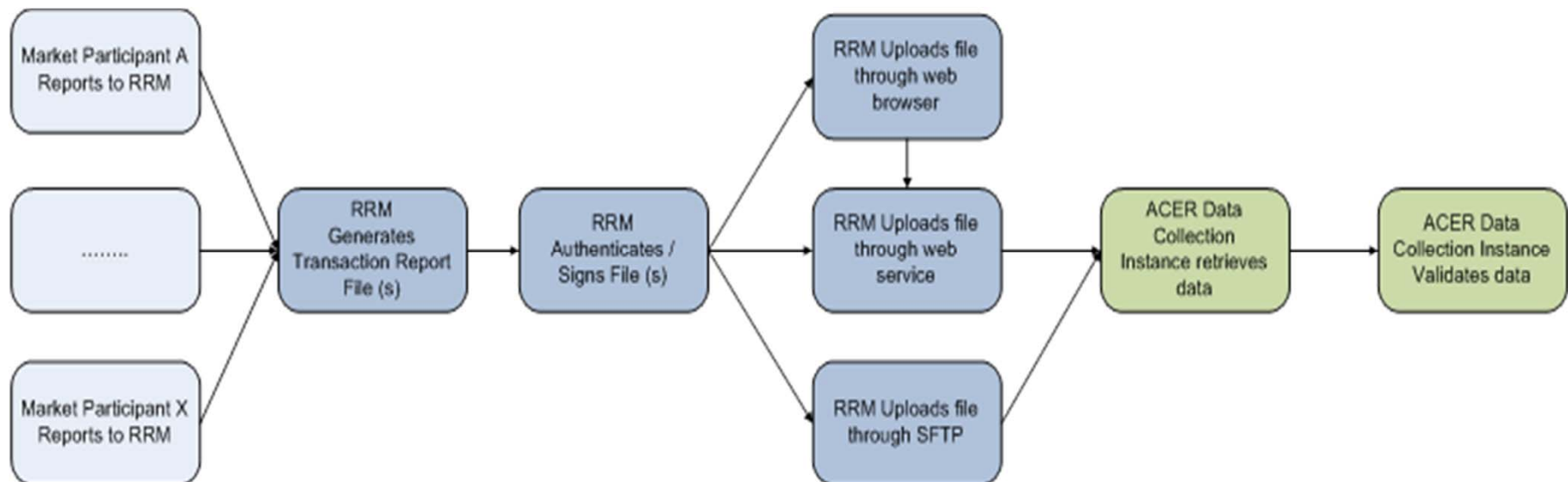
Key technical prerequisites for reporting

- Registration finalised
- Certificates issued/obtained
- PGP keys generated and signed by ACER
- Accounts/credentials created
- Interfaces in place
- Testing completed
- Data available

Inbound data flow:

At least 1 file shall be submitted by the RRM containing the transactions being reported. If a RRM has no transactions to report, then no submission is required; however, a submission with no entries is also accepted.

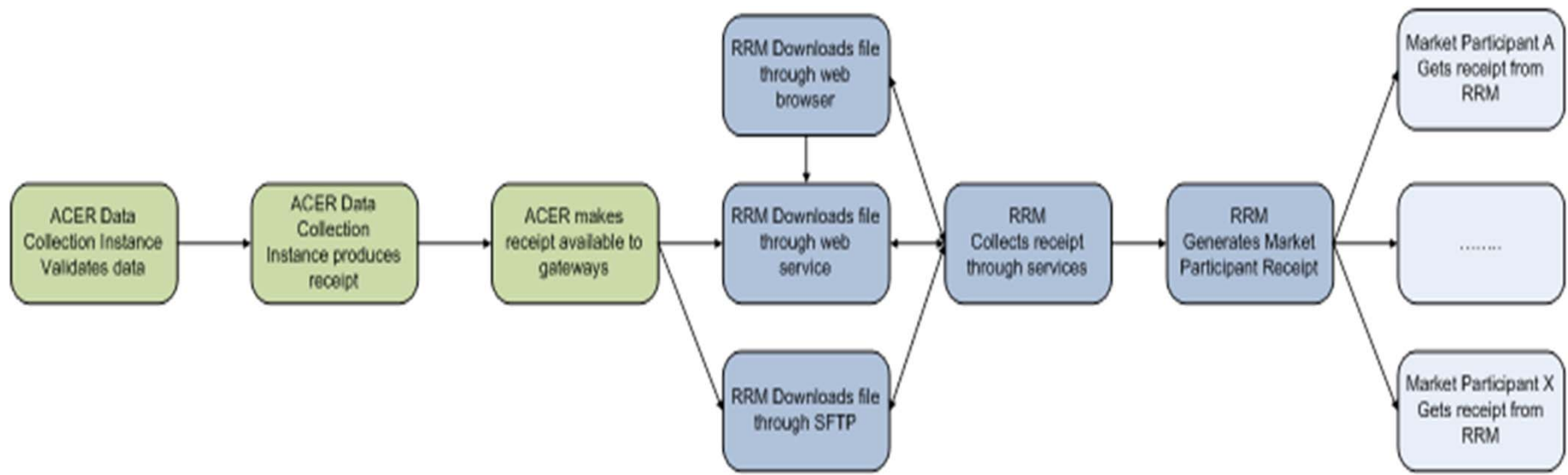
The RRM can submit multiple transaction report files. Each file must be identified in sequence and submitted sequentially by the RRM.



Outbound data flow:

ACER shall produce a receipt for each report file submitted by a reporting RRM.

Receipts will be issued to confirm acceptance/rejection of the submitted file as well as every particular logical record (e.g. transaction, order) within the file.



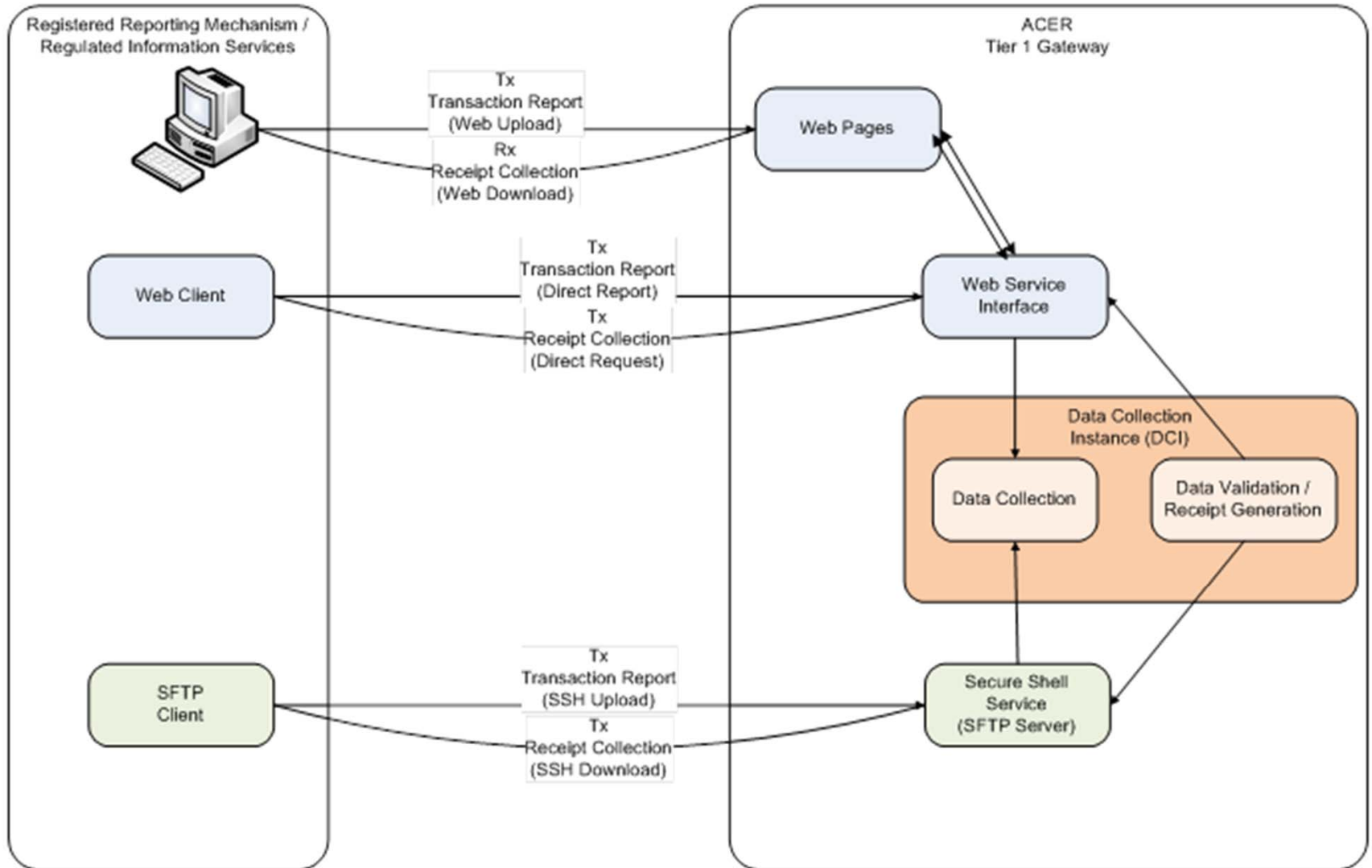
RRMs shall be able to provide transaction reports to ACER through the following interfaces:

- Static file upload via SFTP using SSH authentication
- Automated file upload via secure web services
- Interactive user uploads through the RRM reporting web interface

RRMs shall be able to access receipts for reported transactions to ACER through the following interfaces:

- Static file download via SFTP using SSH authentication
- Automated file download via secure web services
- Interactive user download / viewing through the RRM reporting web interface

Interfaces



Thank you for your attention!



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