

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.1.1

Respondent's view

We understand the aim of the Agency but we believe that the MPs should be facilitated when they have to report lifecycle events. Between the lifecycle events, it is a matter of fact that the novations that occurs for change in the corporate structure of one of the counterparties of deals executed on OMPs could be one of the most burdensome activities.

For this reason, our proposal should be to not allow the use of old version of the tables only for the report with action type NEW. For action type M, C and E the use of the old version of table one should be allowed.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.1.3

Respondent's view

In line of principle, we agree with the proposal to align REMIT and EMIR UTI but we believe that this alignment should not reduce the REMIT possibility to have a UTI code characterized by strong uniqueness. This is the reason why we disagree with the proposal to reduce the maximum length of the field from 100 to 52 character. At the same time, in order to allow the use of EMIR codes also for REMIT reporting, we would like to include in the list of allowed characters also ":" and ".".

Further, without any specific reference to the integration with EMIR, we would like to express our preference for a UTI that allows only the use of capital letter as it could simplify the sharing of the code between counterparties.

To avoid any misunderstanding, we would like to point out that the UTI rules should be the same both for table 1 and table 2 reporting and that no remediation procedure should be imposed to MPs on the trades already reported.

With particular reference to the use of capital letter it is important to note that the proposal is not in line with the new draft of ACER UTI generator recently shared with the associations of the market participants.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.1.4

Respondent's view

We agree with the proposal to remove the field 25 "Index Value" that in the TRUM document is presented with the name "Fixing index or reference price". At the same time we believe that should be maintained the possibility to report the so called simple index trade using table 1. For this reason field 36 "Index value" should be maintained to report the difference (+/-) from the fixing index value.

Further, with particular reference to the xml proposed, we would like to underline that the file shared is not in line with the proposal included in the annex A.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.1.4

Respondent's view

We agree with the proposal to remove the field 25 "Index Value" that in the TRUM document is presented with the name "Fixing index or reference price". At the same time we believe that should be maintained the possibility to report the so called simple index trade using table 1. For this reason field 36 "Index value" should be maintained to report the difference (+/-) from the fixing index value.

Further, with particular reference to the xml proposed, we would like to underline that the file shared is not in line with the proposal included in the annex A.

*** Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.1.6

Respondent's view

We agree with the proposal, provided that it will be applied to the NEW and MODIFY events with no retroactive effect.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.2.1

Respondent's view

We agree with the proposal

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.2.2

Respondent's view

We agree with the proposal, provided that it will be applied to the NEW and MODIFY events with no retroactive effect.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.4.2

Respondent's view

We welcome the proposal.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.4.3

Respondent's view

We welcome the proposal.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.4.4
Respondent's view
We welcome the proposal.

* Mandatory field. The feedback may not be considered if a mandatory field is left blank.

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.4.5

Respondent's view

We welcome the proposal.

* Mandatory field. The feedback may not be considered if a mandatory field is left blank.

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.4.6
Respondent's view
We welcome the proposal.

* Mandatory field. The feedback may not be considered if a mandatory field is left blank.

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.4.7

Respondent's view

We welcome the proposal.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.4.8

Respondent's view

We agree with the proposal presented but also believe that the Agency should clarify if the platform PRISMA (where are recorded a huge number of transactions) is an OMP or not.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.5.6
Respondent's view
We welcome the proposal.

* Mandatory field. The feedback may not be considered if a mandatory field is left blank.

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.5.7

Respondent's view

We welcome the proposal.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.5.8
Respondent's view
We welcome the proposal.

* Mandatory field. The feedback may not be considered if a mandatory field is left blank.

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.6.1

Respondent's view

We welcome the proposal.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.6.3
Respondent's view
We welcome the proposal.

* Mandatory field. The feedback may not be considered if a mandatory field is left blank.

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.6.4
Respondent's view
We welcome the proposal.

* Mandatory field. The feedback may not be considered if a mandatory field is left blank.

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.7.1

Respondent's view

We welcome the proposal.

* Mandatory field. The feedback may not be considered if a mandatory field is left blank.

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.7.2

Respondent's view

We agree with the proposal if the MPs remain allowed to use UTC format for the date and time (Zulu time reference).

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.7.3
Respondent's view
We welcome the proposal.

* Mandatory field. The feedback may not be considered if a mandatory field is left blank.

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.7.4

Respondent's view

We welcome the proposal.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.7.5

Respondent's view

We suggest that the field "Extra" remain "Not Required" as it is now.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.7.8

Respondent's view

We welcome the proposal.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.8.1

Respondent's view

We welcome the proposal.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex B- Form for providing respondents' feedback on proposed changes

Proposed change No. A.8.3

Respondent's view

We support the proposal and we would like to point out that the field should be replicable in order to allow the reporting also in case of multiple assets availability as described in proposals no. A.6.1 and A.6.4.

* **Mandatory field. The feedback may not be considered if a mandatory field is left blank.**

Annex C- Form for providing additional changes and comments

Data type	Table 2
Impacted field(s)	xsd schema
Description of your change proposal/Other comment	Proposal A.1.1
Motivation for the change	With particular reference to the proposal A.1.1 we would like to underline that also for Table 2 it should be maintained the possibility for the MPs to report lifecycle events using the previous version of the format.

Data type	Table 4
Impacted field(s)	Field No (29) Procedure applicable
Description of your change proposal/Other comment	<p>The value admitted should be:</p> <p>A01 = CFO, call for orders for assignment</p> <p>A02 = FCFS, first come first served for assignment</p> <p>A03 = OTC, Over the counter for assignment</p> <p>A04 = CFO_SUB, call for orders for subletting / transfer of use</p> <p>A05 = FCFS_SUB, call for orders for subletting / transfer of use</p> <p>A06 = OTC_SUB, call for orders for subletting / transfer of use</p>
Motivation for the change	The procedure applicable (CFO, FCFS, OTS) is valid both for assignment and subletting / transfer of use.

Data type	Table 4
Impacted field(s)	Fields No (18) Total price, (20) Reserve price, (21) Premium price
Description of your change proposal/Other comment	The fields 18, 20 and 21 should have a proper field for the unit of measure that not only represents the capacity as it is now in the field 16 "Measure unit" but that also give the information of the tariff rate. For example in the current structure it is not possible to indicate whether the price is €/kWh/h/d or €/kWh/h/y.

	<p>Besides the fields Currency (17) and Measure unit (16) we suggest to add a new field to indicate the tariff rate.</p> <p>Such new field should have the values /year, /quarter, /month o /day, so that the fields No (18) Total price, (20) Reserve price, (21) Premium price have the unit of measure made by "Currency"/"Measure unit"/"Tariff Rate".</p>
Motivation for the change	The information on the price that came from the combination of the fields 16 and 17 is not complete.

Data type	Table 1
Impacted field(s)	Fields No (42) (56) Quantity unit
Description of your change proposal/Other comment	For TRUM document should clarify that natural gas trades the value of kWh is expressed at the temperature (usually 0° or 25°) stated in the contract.
Motivation for the change	Temperature is a relevant element for the conversion rate of natural gas.

Data type	Table 2
Impacted field(s)	Fields No (20) Notional quantity unit
Description of your change proposal/Other comment	For TRUM document should clarify that natural gas trades the value of kWh is expressed at the temperature (usually 0° or 25°) stated in the contract.
Motivation for the change	Temperature is a relevant element for the conversion rate of natural gas.

Data type	Table 4
Impacted field(s)	Field No (16) Measure unit
Description of your change proposal/Other comment	For TRUM document should clarify that natural gas trades the value of kWh is expressed at the temperature (usually 0° or 25°) stated in the contract.
Motivation for the change	Temperature is a relevant element for the conversion rate of natural gas.

Data type	Table 4
Impacted field(s)	Field No (35) Price the transferee pays to the transferor
Description of your change proposal/Other comment	It should be foresee the possibility to report also a price formula
Motivation for the change	Also transportation transaction could have an index value as commodity deals.

Data type	Table 1 and 2
Impacted field(s)	XSD schema
Description of your change proposal/Other comment	File XSD correction/review according to Annex A
Motivation for the change	Mismatch between proposals of Annex A and rules/restrictions declared in the new XSD schemas (e.g. rules A.1.3, A.1.4, A.7.2, A.7.5 for Table 1 and declaration of field no. 15 for Table 2)

Data type	Table 1, 2, 3 and 4
Impacted field(s)	Test environment
Description of your change proposal/Other comment	In order to organize a soft change of the schema, we propose to have at disposal of RRMs two different test environment. <ul style="list-style-type: none"> • REMIT TEST ENVIRONMENT 1 - with old rules and old xml schemas/version, to allow tests for specific submissions or bug fixing purpose; • REMIT TEST ENVIRONMENT 2 - with new rules and new xml schemas/version, to allow tests for new implementations.
Motivation for the change	Operator should need to test both "old" and "new" files.

Data type	Table 1 and 2
Impacted field(s)	Price currency (37 in Table 1 and 17 in Table 2)

Description of your change proposal/Other comment	In order to represent the quantities and prices as stated in the contract, it would be useful to have a unit of measure for the quantity (e.g. kWh) and a separated unit of measure to indicate that the price is expressed in €/MWh, for example.
Motivation for the change	Operator sometimes has now to convert the contractual figures.