



Notes from the 11th Public REMIT Workshop – 16th February 2016 Ljubljana

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ACER¹ held a workshop on 16th February several weeks before the “phase 2” go live of REMIT reporting, with the following high level agenda:

- Welcome address and recap of REMIT Transaction Reporting as of 7 October 2015
- Registration of Registered Reporting Mechanisms (RRMs)
- REMIT Transaction Reporting as of 7 April 2016
- The way forward

The full agenda can be found here:

http://www.acer.europa.eu/Events/11th-Public-Workshop-on-REMIT-implementation/Documents/REMIT%20public%20workshop%20Feb%202016_draft%20agenda_v1.pdf

The slides for the entire workshop, aggregated into one file, can be found here:

<http://www.acer.europa.eu/Events/11th-Public-Workshop-on-REMIT-implementation/Documents/Presentations.pdf>

These notes are broadly split as per the workshop. The notes provide highlights of the presentation and the author's thoughts (*bracketed italics*) and general comments and questions that were heard in the room. Many questions from the sessions have been noted here although some are omitted. The notes constitute the author's recollection of the session only.

This workshop was streamed over the web and was also very well attended. It was mentioned that there were 150 attendees.

Opening Speech - Alberto Pototschnig

The session opened with an address by Alberto Pototschnig, Director of ACER. The address opened with a reminder that this was the last public workshop before the phase 2 go live date of 7th April, although since much reporting is to be carried out on a T+1 Month basis the date is later in many cases (*and since executions do not need to be reported until the parent framework contract has been backloaded, the deadline could be considered still later in some cases*).

The audience was reminded that market participants may act as their own RRM for off venue data, and there have now been over 800 RRM applications, when 200 were expected. ACER will try to find ways to accommodate all of these applications, but there will be a necessary reduction in flexibility.

Overall, it is important to implement REMIT properly, and this has been and will be achieved with the support of the industry and constructive engagement.

¹ Agency for Co-operation of Energy Regulators

Welcome address and recap of REMIT Transaction Reporting as of 7 October 2015 - Volker Zuleger

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The presentation opened with an announcement that several updated and new documents had just been uploaded onto the REMIT Portal (which can be found here: <https://www.acer-remit.eu/portal/home>). These include:

- Updated questions and answers document
- Updated Transaction reporting FAQ
- Updated TRUM Annex II (examples) with new and updated examples
- Updated TRUM Annex IV on UTI generation including a new generator for table 2 contracts
- Table 2 XML examples

1,736 market participants have reported in phase 1, with about 100 million records sent so far. The 7th October go live experienced several issues, including in the area of receipt generation, volume and issues with life cycle events. Most of these have now been resolved. However there is an ongoing list of post go live activities.

ACER have until now experienced a lack of budget and resources with only 20 staff working on REMIT. ACER have now been given headcount for 15 more staff of which 11 will work on REMIT. However the allocation is too late to help with the upcoming go live.

It has been necessary to de scope or postpone certain items. This includes delaying the start of the new Inside Information reporting rules until January 2017, and also postponing access to ARIS by outside users. There will also be restrictions on the way in which “direct send” market participants can submit data. There will also be no schema changes before go live.

REMIT Mail and Q&A Overview – Michal Miko

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This brief session looked at process and statistics around questions being asked of ACER on REMIT. There were 1,172 questions in 2015 as opposed to 83 in 2014. January 2016 saw 132 questions. It was claimed that all “properly formed” questions are replied to. (It was not stated if those who send in “improperly formed” question are told thus or just not replied to).

CSD Statistics - Savvas Savvides

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This brief session looked at the progression of issue resolution with ARIS in terms of open tickets. It was stated that there are currently not enough resources to cope with the workload and that automation and other efficiencies are being sought.

RRM Registration Update - Tomaz Zaplotnik & Aleksandra Jercinovic

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This presentation reminded the audience of the application process for RRM. Priority is going to be given to applications from third party RRM, of which 37 have applied. 7 RRM have already been approved for table 2 and 6 for other non table 1 schemas. Self-reporting RRM will be limited to using the web GUI. Applications should take three months to process if problem free,

A new data validation document (which outlines rules for each field as well and matching rules has been issued to RRM last week. *(It is not clear if this will be made available for market participants).*

When RRM are approved, it will be stated for which schemas and data types the approval is given. This includes both the schemas handled (e.g. "table 3") as well as the product type (e.g. "LNG"). *(It was later asked if those third party RRM in the application process will also be shown, by data type. ACER stated that they would consider it.)*

A recommendation was given by ACER that market participants should prefer to report via third party RRM rather than self-reporting.

Presentations made by third party RRM

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Six third party RRM made presentations of their offerings. These were (in order of presentation):

- EFETNet
- GME
- ICE
- REGIS-TR
- Solien
- REMIT Cloud

A comment was made by ACER that with several RRM offering fee holidays there appears to be even less need for market participants to self-report.

Questions at the end of the first sessions

Q: What is the success rate of RRM applications? **A:** This is not disclosed.

Q: Are different certificates required (by RRM) for the test and production environment? **A:** Yes.

Q: Will the RRM approval list show applications in progress, by schema and data type? **A:** This is not planned but will be considered. Phase 1 saw a "pre-registration" list.

Q: Self reporting market participants with many affiliate entities will struggle to manage their data submission via the web GUI. Can this be made easier? **A:** Such a scenario is hard to handle when self-reporting, but it has been necessary to introduce the web GUI restriction.

Q: Is there a time limit by which time RRM applications must commence? **A:** No it will always be possible to apply after go live. *(There are less than 3 months to go until go live, so any who have not yet begun an application will need to use a third party RRM for now).*

Transaction reporting – Technical topics - Sofronis Papageorgiou

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This presentation opened the section on transaction reporting (*which was the area of key interest for most of the audience.*) There was a reminder of the architecture and development cycles, and a claim that most technical issues have been fixed.

A schema change is likely to be implemented in spring of 2017.

There was a reminder that becoming an RRM involves not only an upfront investment, but an ongoing one as there are likely to be many changes in the years to come, all of which need to be complied with.

Files with backloading data should be submitted (by the RRM) with a filename that contains a date on or before 4th October 2015. Backloading will be supported from April 7th.

REMIT Transaction Reporting – Elio Zammuto

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This session addressed many topics around the reporting of data. It started by listing the many documents available to assist in reporting, which now comprise more than 600 pages. There was a physical demonstration of what 600 pages look like, with a comment that “there is enough reading material”. There are now new examples available, new answers and other material.

It was highlighted that all answers given are cross checked with NRAs and usually discussed with stakeholder groups.

The question of which trades are “standard” and “non-standard” continues to be discussed. A stakeholder meeting will take place on the 2nd and 3rd of March after which some more instruction may be given in this and other matters (*which, one month before go live, will be challenging to act upon in time*).

Reporting of electricity and gas transportation contracts - Tomaž Vižintin

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The session provided a bit of guidance around tables 3 and 4, both of which rely on non ACER schemas. An explanation was given on the mappings in table 3, and also around the EDIGas format used for table 4. It is only possible to identify the reporting party using an EIC code in these tables. A template to generate power and gas examples will also be provided. The fields in the EDIGas schema not used by REMIT do not need to be filled.

Examples in this format will soon be issued (it was later stated by the end of the week). However a small number of examples should be expected.

Fundamental data – 2nd phase reporting - Markéta Stuchlíková

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This short presentation covered how to report fundamental data, with a focus on the three types of data reportable by market participants: daily gas in store, LNG unloads and reloads and LNG planned unloads and reloads. It mainly looked at how to find out more about the schemas, although it also clarified reporting deadlines for gas nominations.

Questions on transaction reporting (re ordered)

Q: If two events occur with the same trade on the same day (e.g. it is struck and later modified) do both events need to be reported? **A:** Yes, all “real” events (i.e. agreed between the counterparties) must be reported. (*This is in contrast to EMIR, where generally only the end of day status is reported*).

Q: Is a border swap on the EU border reportable? **A:** Only the leg which is delivering to the EU is reportable.

Q: Does a transfer of capacity between the EU and non EU need to be reported? **A:** The principle is that delivery should be in the EU.

Q: Are tolling agreements reportable? **A:** Only if it is a contract for supply. Services are not reportable. It is generally better to rely on a written answer than an oral one, which you can get by submitting it via a roundtable.

Q: If a trade is already reported under EMIR, and thus has an EMIR UTI, but then “moves” into REMIT, how do you reconcile the UTIs **A:** The TRUM provides examples.

Q: If a trade is reported under EMIR do associated orders need to be reported under REMIT? **A:** Yes.

Q: What index name do you use for a non-standard contract? **A:** This is considered on a case by case basis. There is guidance in the TRUM.

Q: Will there be any examples for fundamental data? **A:** No.

Q: How do you submit error corrections and lifecycle events for fundamental data, since there are no record IDs? **A:** It is necessary to simply re submit the data.

Q: Given the lack of information around fundamental data, will there be leniency in fulfilling this requirement? **A:** Each NRA will need to decide re leniency. It is recommended that market participants exhaust all available channels. It is likely that there will be further guidance on fundamental data after go live as the focus so far has been on transactions.

Q: Has ACER come out with a decision on whether Physical LNG cargoes are reportable? **A:** LNG contracts should be reported as frameworks, with deliveries reported as executions. This includes frameworks where delivery in the EU is optional. In such a case the execution only needs to be reported if actual EU delivery takes place. (*There is an answer in the latest Q + A document about the inclusion of LNG*).

Q: Please explain how LNG fundamental data works with trucks? **A:** Please email us.

Q: Is a truck send out considered to be re gasification? **A:** Please email us.

Q: Do lifecycle events need to be backloaded? **A:** Yes if they occurred after the backload.

Q: Which schema should be used to report capacity resales? **A:** An example will be issued.

Q: How do you report a temporary change in capacity? **A:** Please email us.

Q: With technical capacity which values should be reported? **A:** Please email us.

Q: It is not clear which value to use for sender identification in field 1 of table 4 **A:** A schema mapping will be published by the end of the week.

Q: What do you report under tables 3 and 4 if the party does not have an EIC code? **A:** The party needs to apply for an EIC code.

Q: Who reports a capacity option? **A:** The TSO if they are involved, otherwise the market participant.

Q: Will there be further updates, examples or changes prior to April 7th, or another update to the UTI generator? **A:** It is best to “stay in touch”.

Q: Which data fields will be matched? **A:** The aforementioned validation document will contain this information.

Q: Will another version of the transaction reporting FAQ be published after today? **A:** We don't yet know.

Q: There seem to be many unanswered questions and much dialog. What happens if we do not get answers before 7th April? **A:** We only answer questions after we consult with others. The market should be privileged that such public workshops are held, in contrast to other rules, and most questions are answered. The ones still uncovered are very specific. It helps to apply common sense. If it is applied no one will kill you. (!). (It was separately stated that that NRAs may disagree with some of these answers and apply sanctions.) (*There was quite a bit of reaction to these comments*).

The Way Forward – Volker Zuleger

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The meeting concluded with the thought that it is likely that April 7th will see the beginning of a “tweaking” process that will run into 2017 with changes. There is also the possibility of a public workshop later this year for inside information reporting.

Concluding Thoughts

There are just over six weeks to until April 7th and there appear to be many issues and unanswered questions. Most third party RRM's are not yet approved. And yet the date will not move. It is therefore likely, that the weeks and months after April 7th will continue to see a great deal of activity. “Business as usual” reporting seems to be some way off.

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