



Picture courtesy of Gas Connect Austria

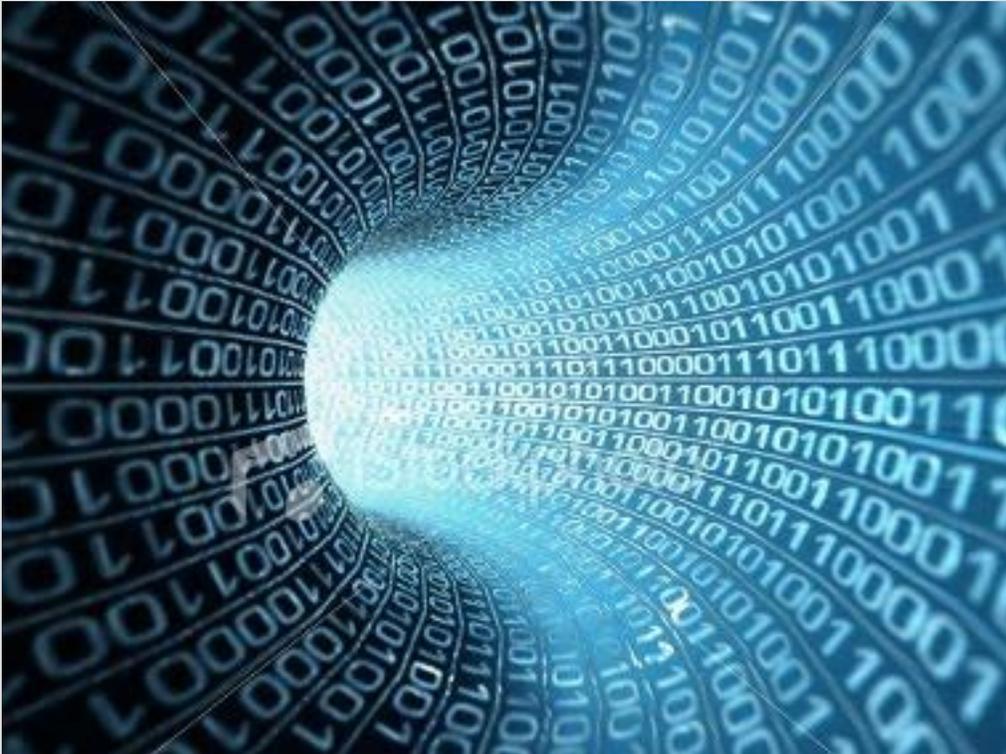
REMIT implementation – 2020 update

14 Transparency Workshop 19 November 2020

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REMIT reporting data quality

REMIT reporting data quality



- TSOs appreciate the revived ENTSOG-ACER-TSOs REMIT discussions
- Examples by ACER of properly structured reports are welcomed
- Best efforts will be applied to address the noted issues
- Consistent recommendations in all ACER documents is needed
- Potential schema changes shall be avoided to the extend possible
- If needed, all XSD changes shall be applied within one round after public consultations and with sufficient notice in advance

REMIT Table 4 – Validation Rules

New validation rules for REMIT Table 3 and 4

- EIC-X code to identify Market Participants
 - MPs must have an EIC-X code and provide it in CEREMP
 - Third character must be X and 16 characters
 - Reports containing incompliant MPs will be rejected

MP codes must also be present in CIO Data base

entsoe.eu/data/energy-identification-codes-eic/#eic-lio-websites

EIC LIO Websites

On this page

- [Energy Identification Codes \(EIC\) Lists](#)
- [Energy Identification Codes \(EIC\) Documentation](#)
- [EIC LIO Websites](#)**

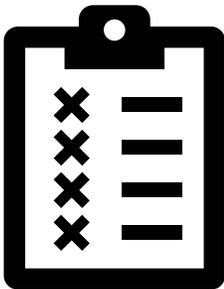
LIO CODE	NAME	COUNTRY	WEBSITE	EIC WEBSITE	EMAIL	OPERATES IN ELECTRICITY
10	ENTSO-E	EU			Email	✓
11	BDEW	DE			Email	✓
12	Swissgrid	CH			Email	✓
13	A&B	AT			Email	
14	APCS	AT			Email	
15	Mavir	HU			Email	✓
16	REN	PT			Email	✓
17	RTE	FR			Email	✓
18	REE	ES			Email	✓
19	PSE S.A.	PL			Email	✓
20	CREOS	LU			Email	
21	ENTSOG	EU			Email	
22	Ella	BE			Email	✓
23	EFET	EU			Email	✓ (only X codes)
24	SEPS	SK			Email	✓
25	AGGM	AT			Email	✓
26	Terna	IT			Email	
27	CEPS	CZ			Email	✓
28	ELES	SI			Email	✓
29	ADMIE	GR			Email	✓
30	Transelectrica	RO			Email	✓
31	HOPS	HR			Email	✓
32	ESO AD	BG			Email	✓
33	MEPSO	MK			Email	
34	EMS	RS			Email	✓
35	CGES	ME			Email	✓
36	NOS BIH	BA			Email	✓
37	DVGW	DE			Email	
38	Elering	EE			Email	✓
39	FGSZ	HU			Email	
40	EPIAS	TR			Email	✓
41	LITGRID AB	LT			Email	✓
42	EU-STREAM	SK			Email	
43	AST	LV			Email	✓
44	Fingrid Oyj	FI			Email	✓ (except X codes)
45	Energinet	DK			Email	✓

TSOs' position on validation rules

- Good data quality 
- Validation rules for Market Participant Identification
 - REMIT TABLE 3 and 4 : Transportation contracts 
 - TSOs are sending data for many MPs in aggregated manner, following REMIT and IA
 - Rejections happen at **file** level, i.e. data for **many MPs** is rejected if **one** MP is non-compliant
- Current solution will lead to a multitude of rejections in ARIS
 - TSOs have no power to force the MPs to align their registration in CEREMP with the information in other systems (as shown in the presentation from 2018)
 - The rules are aimed to improve data quality but might hinder/block the reporting

Call to action for NRAs and ACER*

- **Urge MPs to register in line with REMIT Article 9 requirements**
The registration at the NRA records the MP in ACER CEREMP
- **Approve MP registration requests only if supplemented by party EIC**
The EICs are mandatory for MP registration according to ACER Decision 1/2012
- **Urge MPs to provide and maintain correct and consistent data in their registration**
The same EIC shall be used for MP registration with NRA at ACER CEREMP, electronic data exchange, participation in transactions, data reporting and publications
- **ACER should make the EIC field in MP registration tool mandatory**
 - Currently, the EIC field is technically optional, while ACER Decision 1/2012 marks it as mandatory
 - 2018: 72 % (9915 out of 13753, November 2018) of MPs registered in ACER CEREMP don't provide any EIC
 - 2020: 70 % (10 718 out of 15 401) of MPs registered in ACER CEREMP don't provide any EIC



Call to action for Market Participants*



- **Register as Market participants in line with REMIT Article 9 requirements**

The registration at the NRA records the MP in ACER CEREMP

- **Provide the mandatory company EIC in the ACER CEREMP registration**

The EICs are mandatory for MP registration according to ACER Decision 1/2012

ACER Second Open Letter on REMIT data quality: “Not providing a complete registration (e.g. not providing an EIC X code the Market Participant possess) is a breach of Article 9 of REMIT.”

- **Provide and maintain correct and consistent data at ACER CEREMP**

Use the same EIC for registration with NRA at ACER CEREMP, electronic data exchange, participation in transactions, data reporting and publication

- Use **valid EICs - type “X”**, with **international significance** for company identification

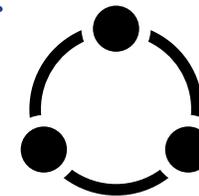
- EIC LIO Websites: [Link](#)

Call to action for Booking Platforms*

- **Only allow access to the platform for primary transactions for MPs (Network users) registered in line with REMIT Article 9 requirements**
 - **REMIT Art. 9(4)** Market participants referred to in paragraph 1 of this Article [9] shall submit the registration form to the national regulatory authority prior to entering into a transaction which is required to be reported to the Agency in accordance with Article 8(1).
- **Establish means to cross-check MPs' (Network user) company data provided to BP**

Verify the provided EIC and VAT against the data for the same MP in:

 - ACER CEREMP
 - ENTSO-E EIC database
 - EC VIES VAT number validation tool



What has been done since 2018?

- TSOs have contacted their customers and updated relevant documentation
- ACER has issued open letters to RRMIs to notify their MPs
- ACER has issued notice to all Market Participants to be compliant with Art. 9 of REMIT before the activation of the validation rules (planned for January 2020)

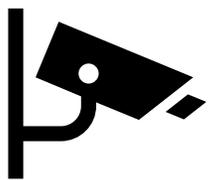
Are stakeholders aware of their role in solving the data quality issues?



What's next for the validation rules?

☹️ What's missing?

- As TSOs' reporting could be blocked, **guidance** on how the TSOs/RRMs shall act in case of rejection due to incompliance of a Market Participant is needed!
- Stronger NRA and ACER attention towards incompliant MPs is needed
- Lack of MP's REMIT compliance has a major cost effect for TSOs and RRM's
- Art. 9 compliance should be incentivized for Market Participants



Impact of Brexit on the validation rules?

- Brexit will make the problem more pronounced, thus **guidance** on how the TSOs/RRMs shall act in case of rejection due to registration issue with UK MP and REMIT Table 4 validation rules is needed
- There is a high risk that most TSO-reporting will be blocked due to the combined effect of validation rules and Brexit (MP re-registration)
 - Rules meant to ensure high quality data will lead to “no data”
- TSOs suggest that to avoid chaos, the activation of the validation rules are **postponed** till after BREXIT transition period



CEREMP improvements recommended by ENTSOG

ENTSOG recommendations for CEREMP improvements



1. MP VAT to be added to the public part of CEREMP
 - To facilitate the verification process for RRM/BP/TSO/OMP side of MP's data
2. Possibility for automated (machine-to-machine) access to CEREMP XML
 - To improve and facilitate the MP's data verification process by RM/BP/TSO/OMP
3. EIC field – must be mandatory
 - It is not possible for an MP to get access to TSO system without using an EIC code – i.e. they all have one!
4. Possibility for indicating the alternative location for inside information disclosure
 - Recommended delimiter in the existing field for II-location or
 - A new field
5. CEREMP technical issues obstructing MPs' EICs data update – needs to be resolved in time before the activation of the new validation rules

REMIT Fees – expectations from TSOs

Summary of ENTSOG view in previous for a discussions



REMIT budget establishment:

- Annual public consultation on activities to be covered by the fees,
- Budget framework on 3-5-year basis.

Fee's methodology:

- Volumetric model for reported transactions of trade data only (incl TSOs' gas trades).
- Fundamental data & transportation transactions shall be exempted

Fee's addressees:

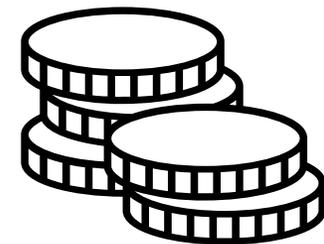
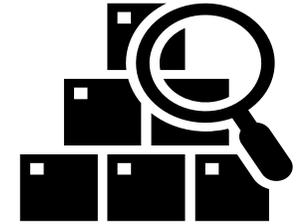
- MPs are the actual addressees, RRM's can be proxies
- ACER shall ensure a high level of transparency to facilitate the process with a detailed overview of the reported data per MP

Calculation and collection of fees:

- Ex-post principle

REMIT fees

- Transparency need on the execution of the fee methodology:
 - Data-type tailored methodology for record **counting**
 - New or updated data
 - Data quality should be incentivised => updating records should be free of charge
 - Inventory on the reported data per MP and RRM
 - Most MPs have more than one RRM
 - The effect of the applied methodology should be reviewed after 1-2 years to ensure that certain stakeholders are not disproportionately affected
- Higher expectations on ACER services
 - SLA between ACER and the RRM (for technical and business questions)
 - Quality of responses incl. data quality reports



Other RRM may have additional expectations



Thank you for your attention

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