ACER
Agency for the Cooperation of Energy Regulators

RRM Requirements

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Outline

- Legal basis
- Process
- Short overview of the registration process
- ACER assessment of compliance
- Technical description of the reporting process

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 RRMs
on the basis of Article 11(1) of the draft IAs

Technical Specifications for RRMs

Manual of Procedures on Transaction and Fundamental Data Reporting
on the basis of Article 10(3) of the draft IAs

Transaction Reporting User Manual (TRUM)
on the basis of Article 5(2) of the draft IAs

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RRM Requirements – Legal basis (1 / 3)

"1. In order to ensure efficient, effective and safe exchange and handling of information the Agency shall after consulting relevant parties develop technical and organisational requirements for submitting data. The Agency shall consult relevant parties on material updates of these requirements.

The requirements shall:
a) enable the security, confidentiality and completeness of information,
b) enable the identification and correction of errors in data reports,
c) enable the authentication of the source of information,
d) 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."

Article 11 of the Implementing Acts

RRM Requirements – Legal basis (2/3)

"The Agency should assess reporting parties' compliance with those requirements. The assessment should ensure a proportionate treatment of professional third parties handling market participants' data and market participants reporting their own data."

Recital 10 of the Implementing Acts

RRM Requirements – Legal basis (3 / 3)

"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."

Article 11 of Implementing Acts

Process

- PC on RRM / RIS guidelines (spring 2013)
- Roundtables with relevant stakeholders (second half of 2013 and 2014)
- Discussions with the ENTSOs and TSOs
- PC on RRM requirements (July–August 2014)
- Adoption of RRM requirements and finalisation of technical specifications document (in parallel with IAs)

Who shall register?

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

- Organised market places
- Third parties reporting on behalf of the above entities
- Trade repositories
- Approved reporting mechanisms

} simplified registration process?

- ENTSOs
- TSOs
- LSOs
- SSOs
- Market participants

As regards the contracts listed in Article 4(1) of the IAs, for the time being ACER does not intend to request information on those contracts. ACER will consult in due time before establishing RRM requirements applicable for the reporting of contracts covered by Article 4(1) of the IAs.

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 RRM technical specifications
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

Assessment of compliance

- Internal policies, processes, mechanisms proving compliance with the requirements must be documented and submitted
- When assessing compliance with the requirements, ACER will ensure a proportionate treatment of the different categories of reporting entities
- ACER may request additional information
- ACER can consult NRAs / other authorities
- ACER may request compliance report certified by external auditor
- ACER may discontinue access to ARIS after warning RRM – associated MPs informed

Registration – Attestation that requirements are met (1/3)

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 reporting deadlines indicated in IAs
- Business continuity mechanisms to guarantee proper handling of incidents that could hamper timely reporting

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
- Identify omissions and obvious errors, request and/or initiate re-transmission of any such erroneous or missing reports

Registration – Attestation that requirements are met (2/3)

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 (3/3)

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

Registration – Undertakings (1/2)

DISRUPTION

- Undertaking to inform ACER without delay if operations are disrupted
- Undertaking to provide ACER within 15 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 15 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 (2/2)

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

Key technical prerequisites for reporting

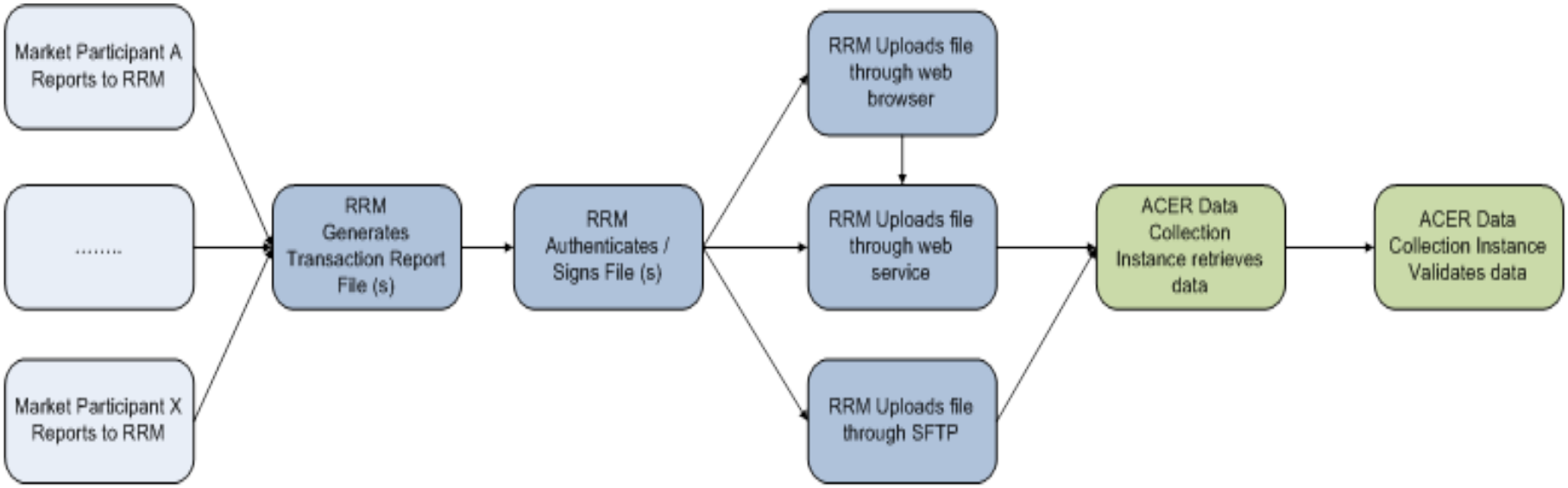
- Registration finalised
- Certificates issued/obtained
- PGP keys generated and signed by ACER
- Accounts/credentials created
- Interfaces in place
- Testing completed
- Data available

Technical description of the reporting process

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.

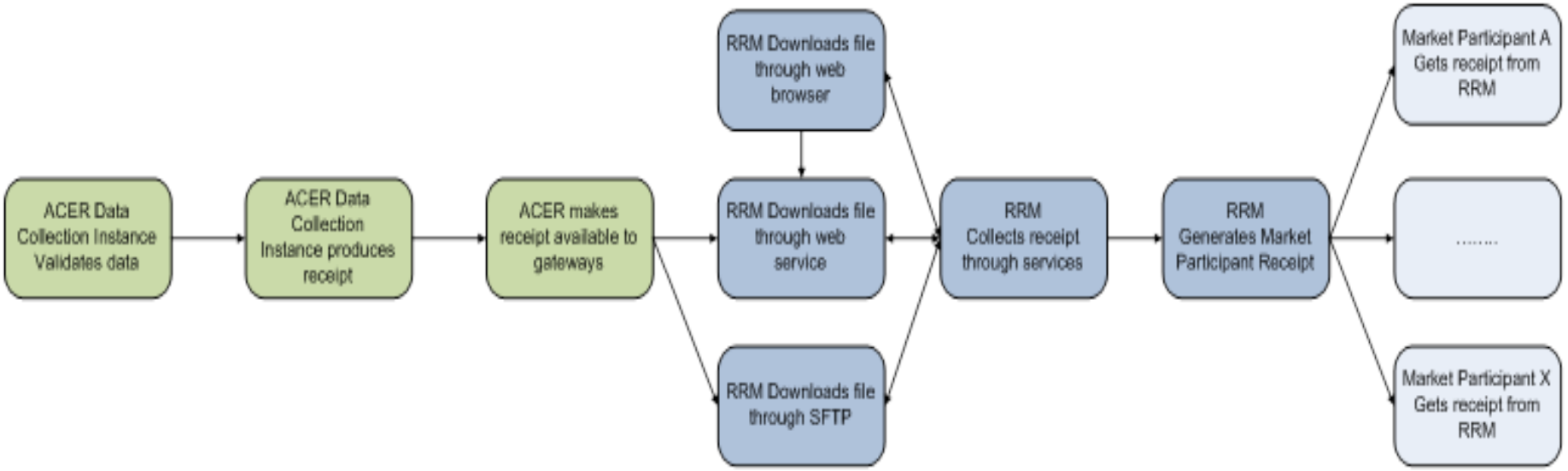


Technical description of the reporting process

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.



Interfaces

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

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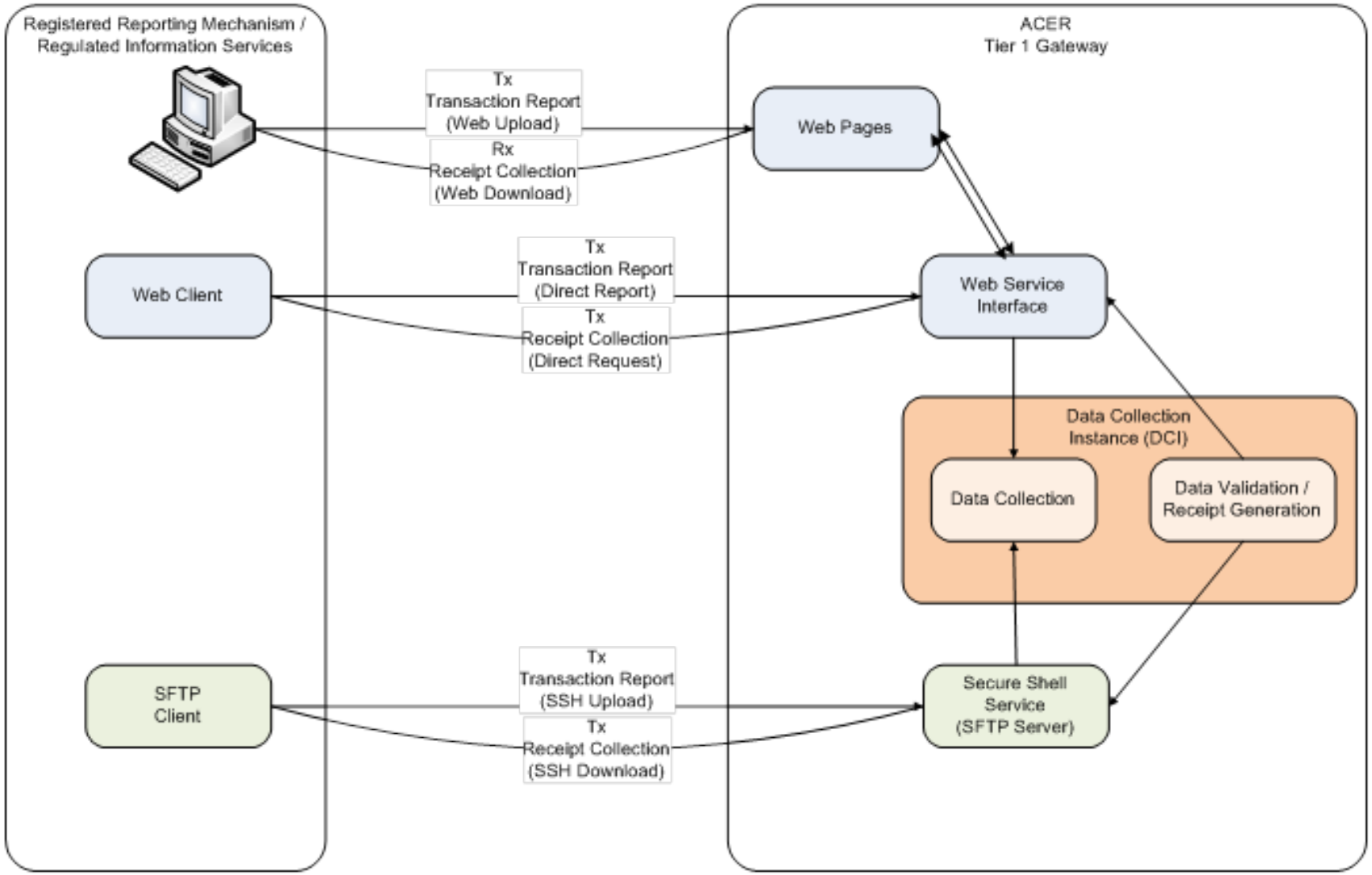
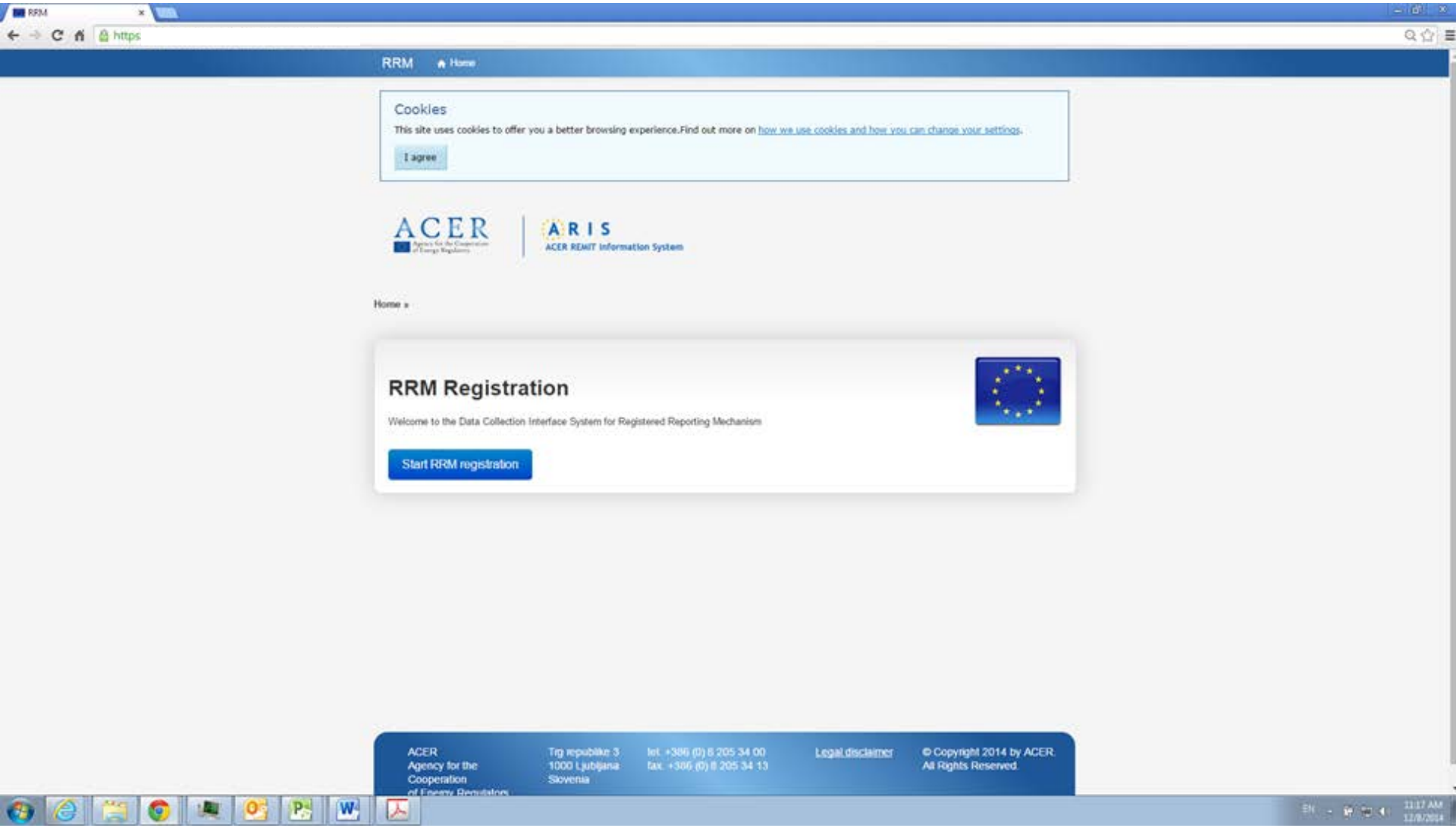
Interfaces



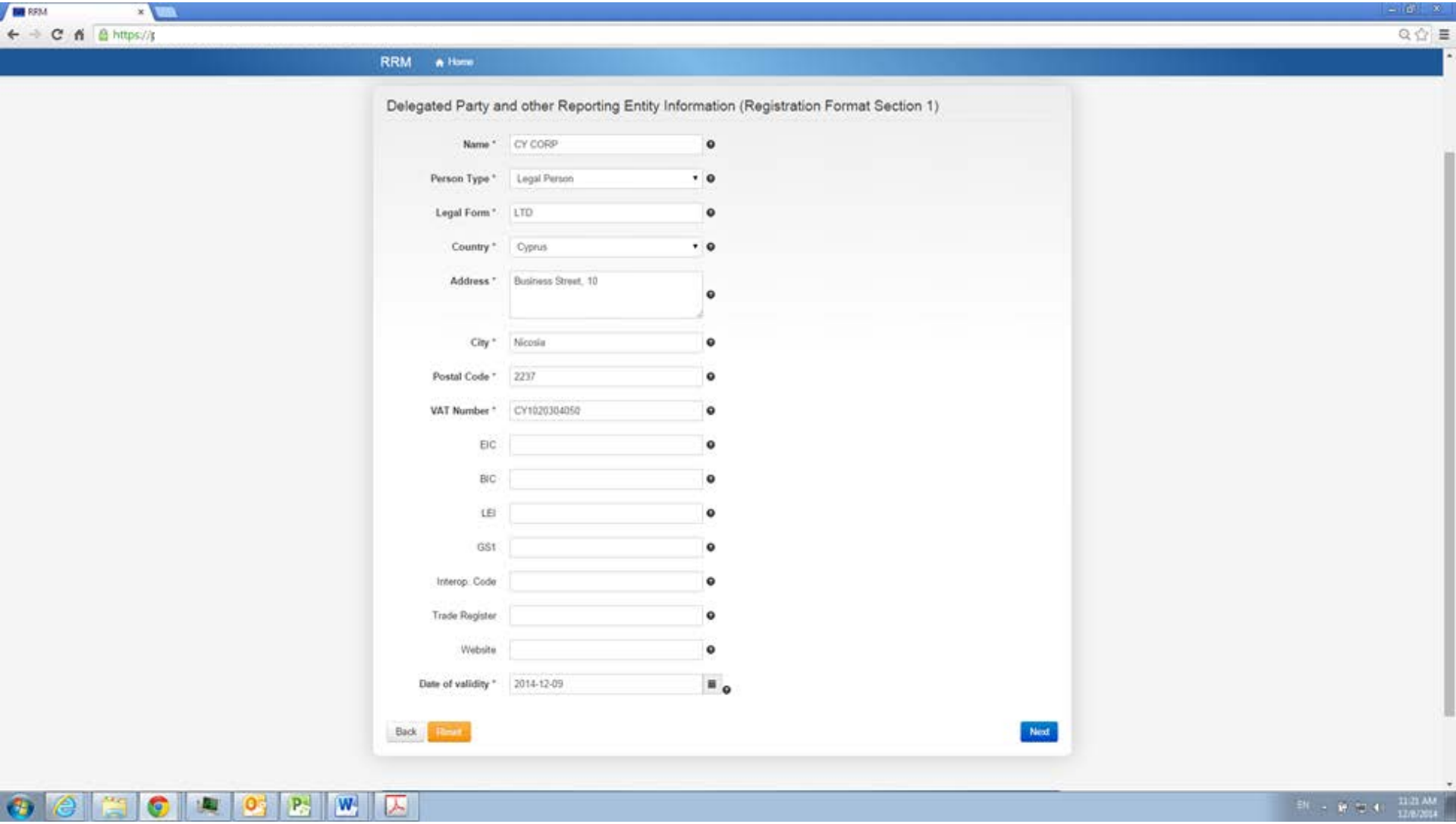
The way forward

- Ongoing development of the RRM registration tool and review of the RRM Requirements based on the feedback received
- Possible testing of RRM registration tool by relevant parties in December/January
- First edition of the RRM Requirements will be made public upon the entry into force of the IAs
- Start of RRM registration upon entry into force of the IAs

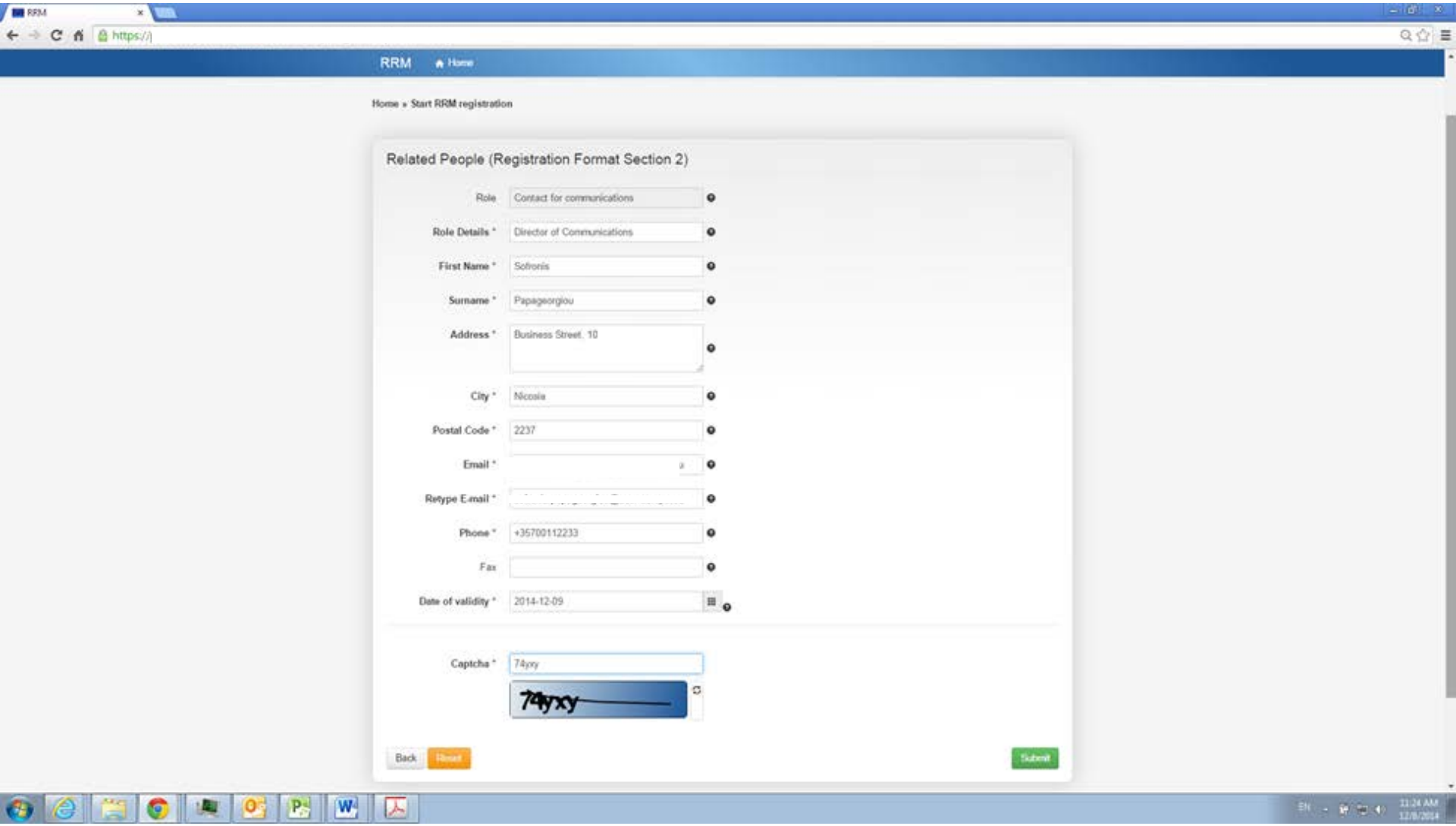
RRM Registration Tool - 1



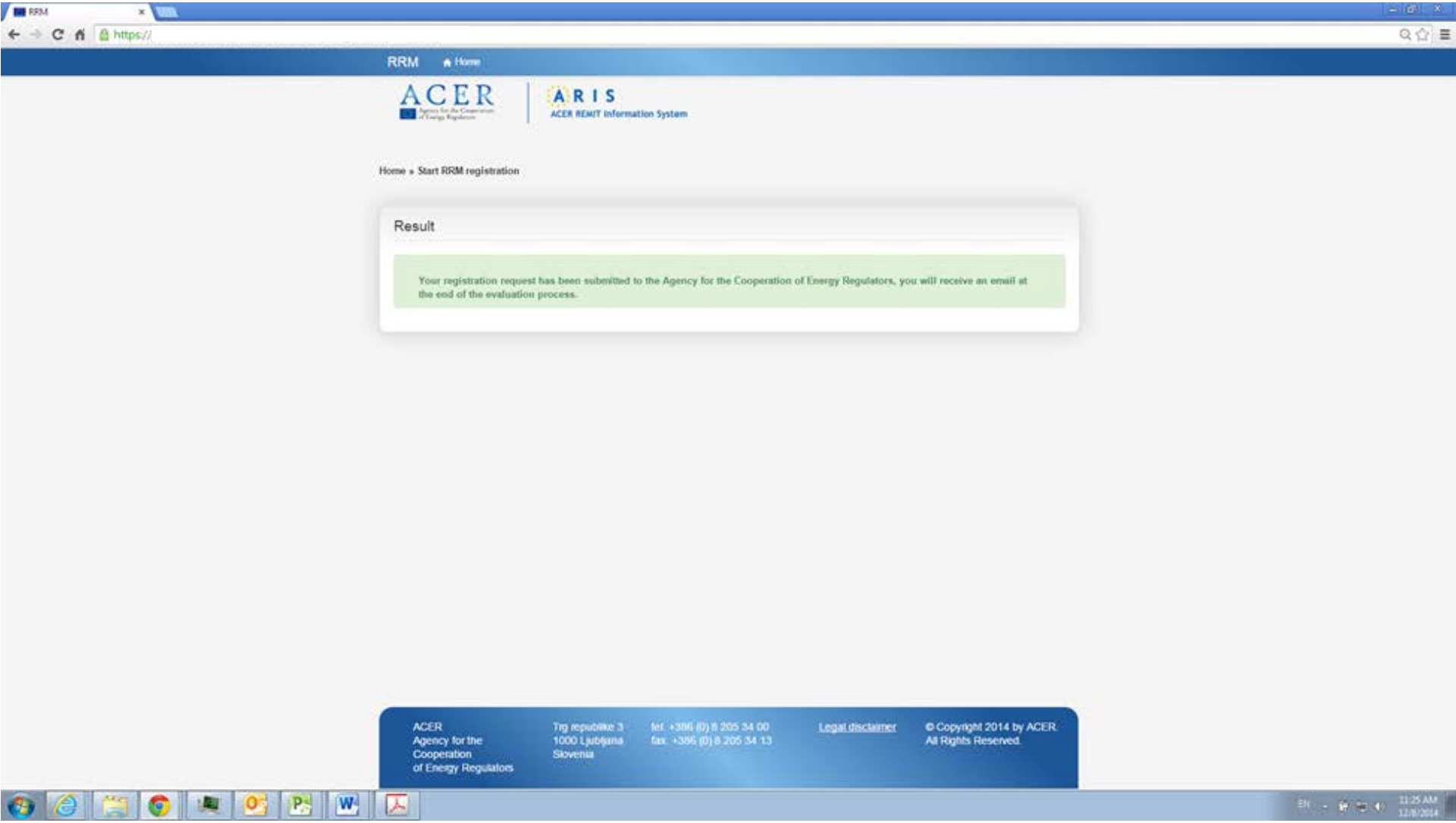
RRM Registration Tool - 2



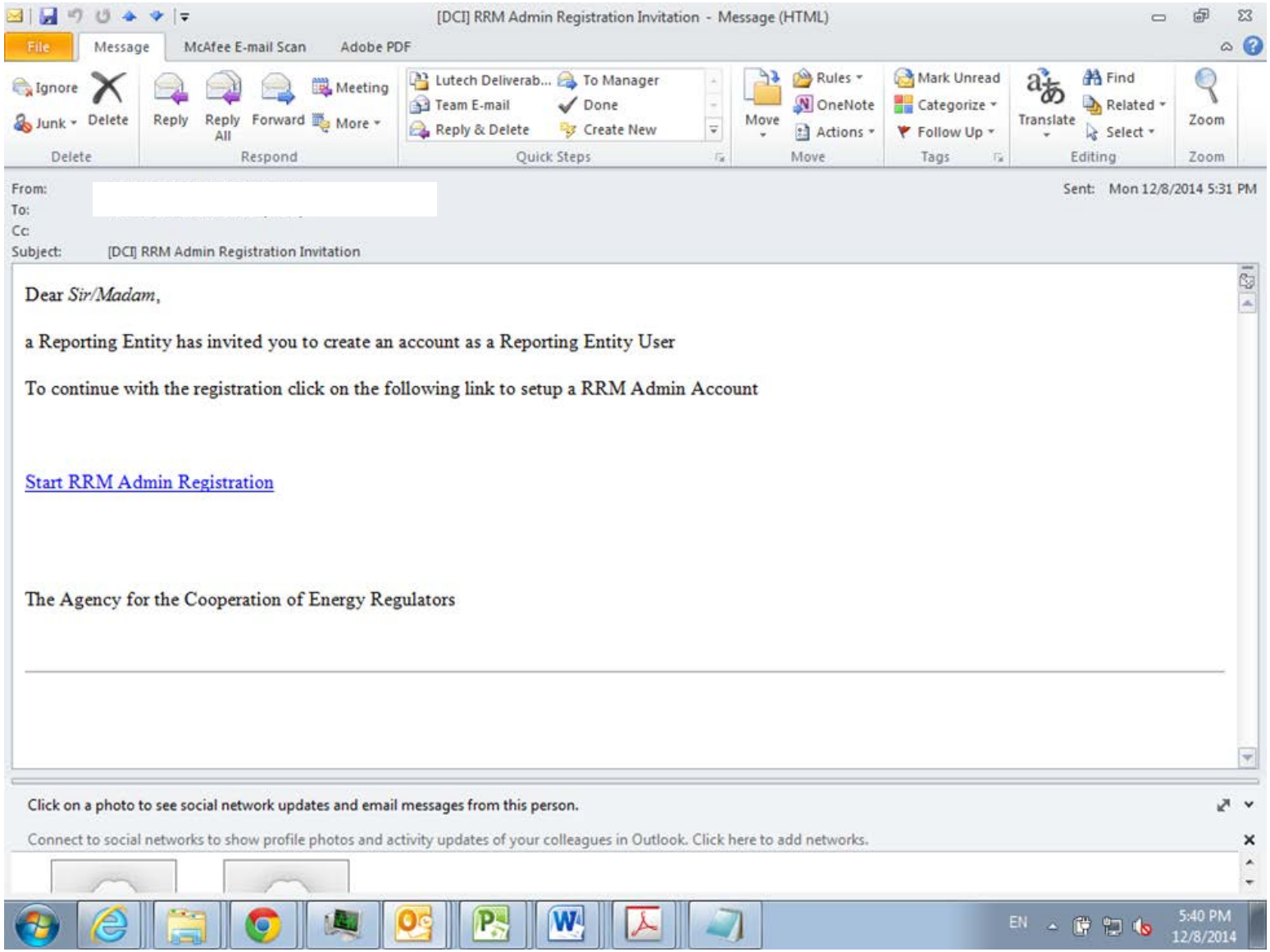
RRM Registration Tool - 3



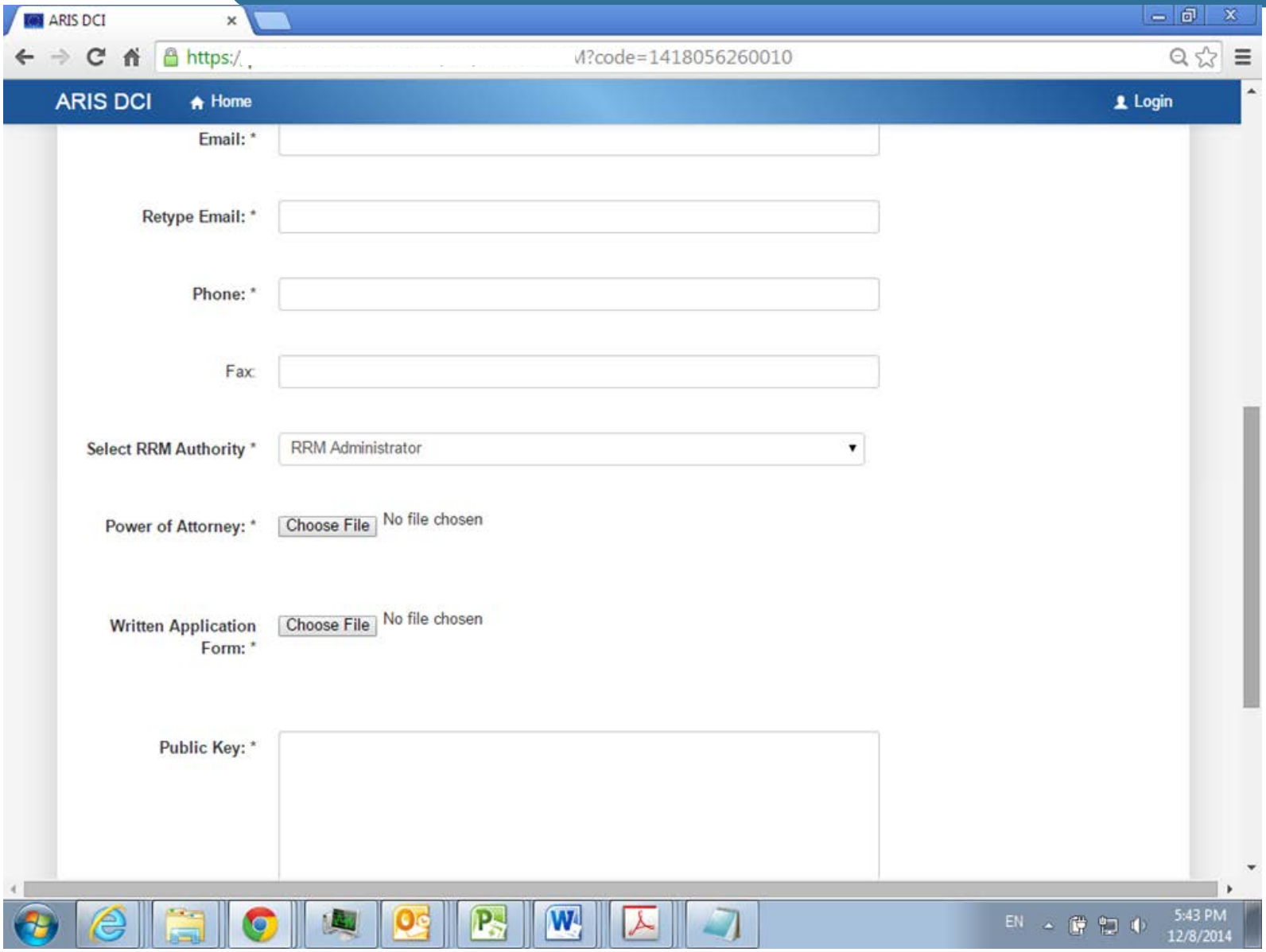
RRM Registration Tool - 4



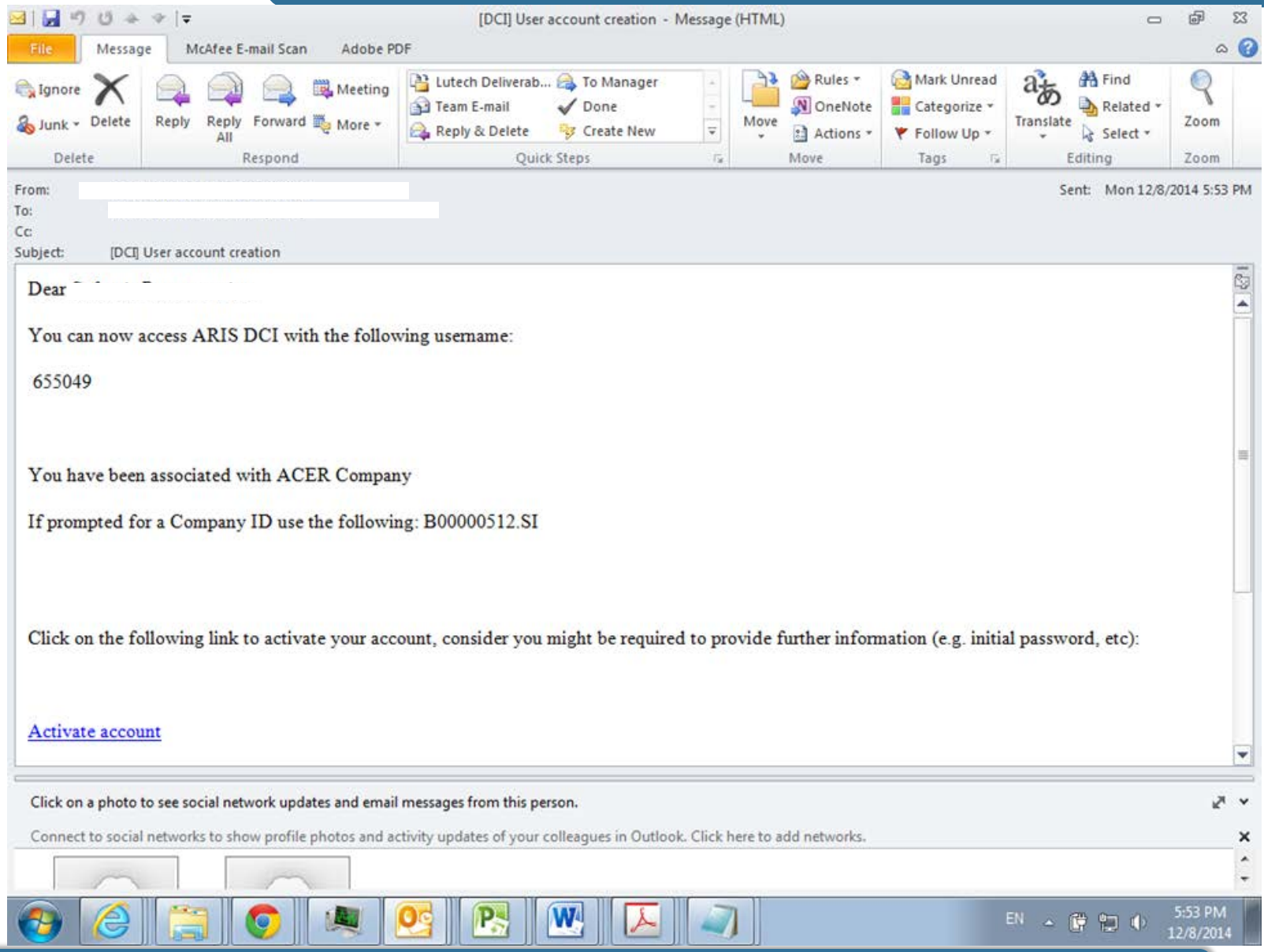
RRM Registration Tool - 5



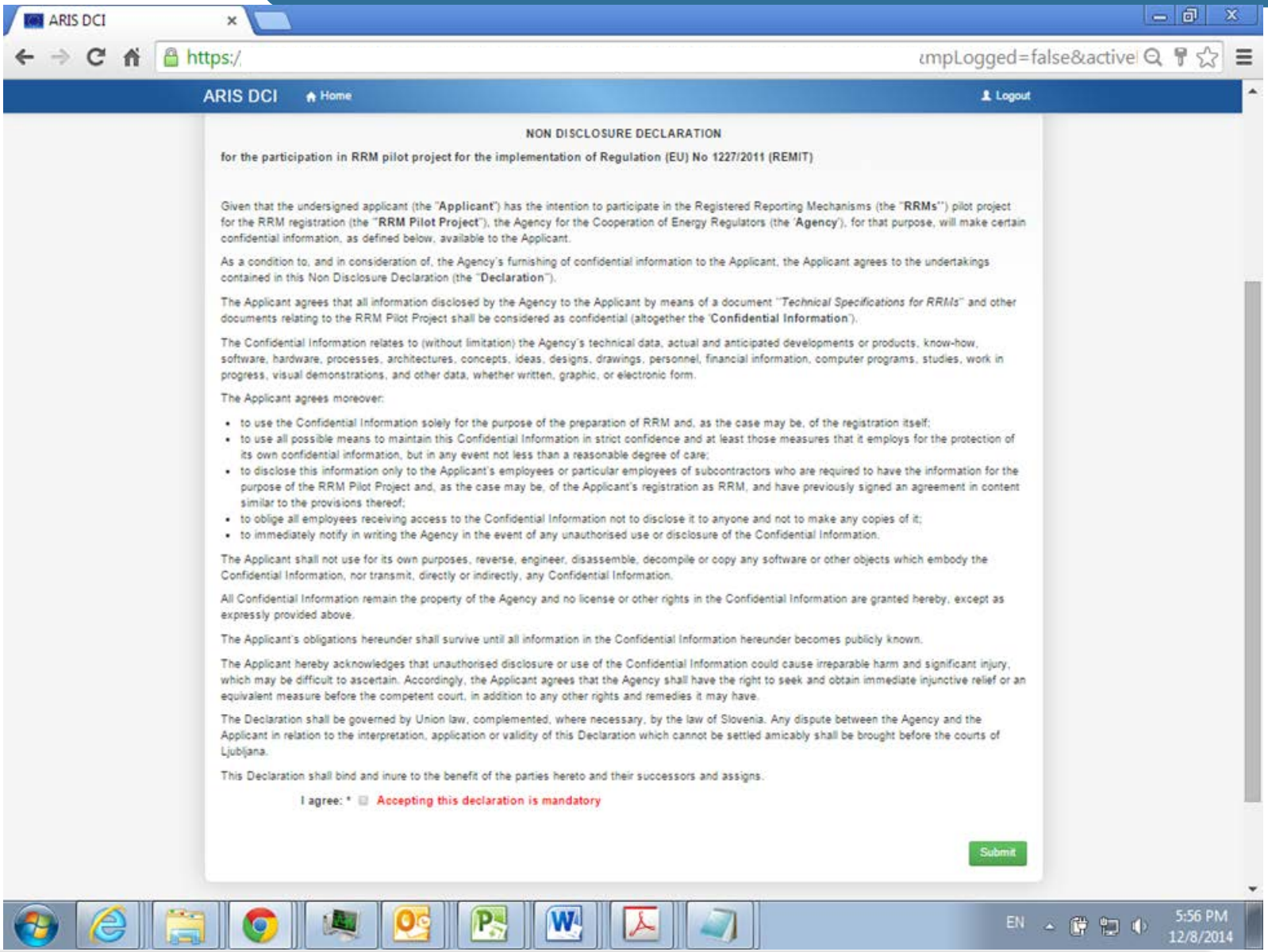
RRM Registration Tool - 6



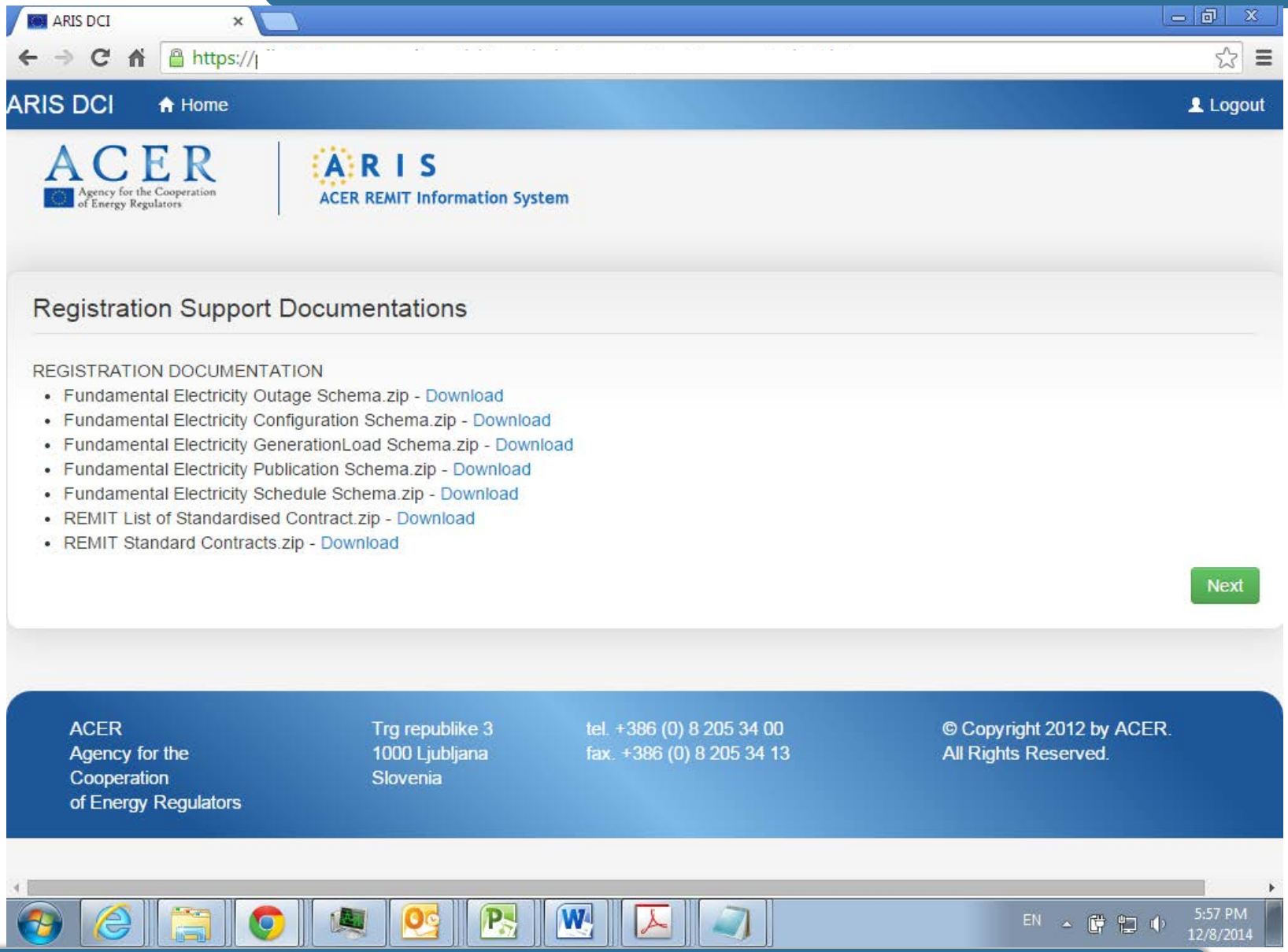
RRM Registration Tool - 7



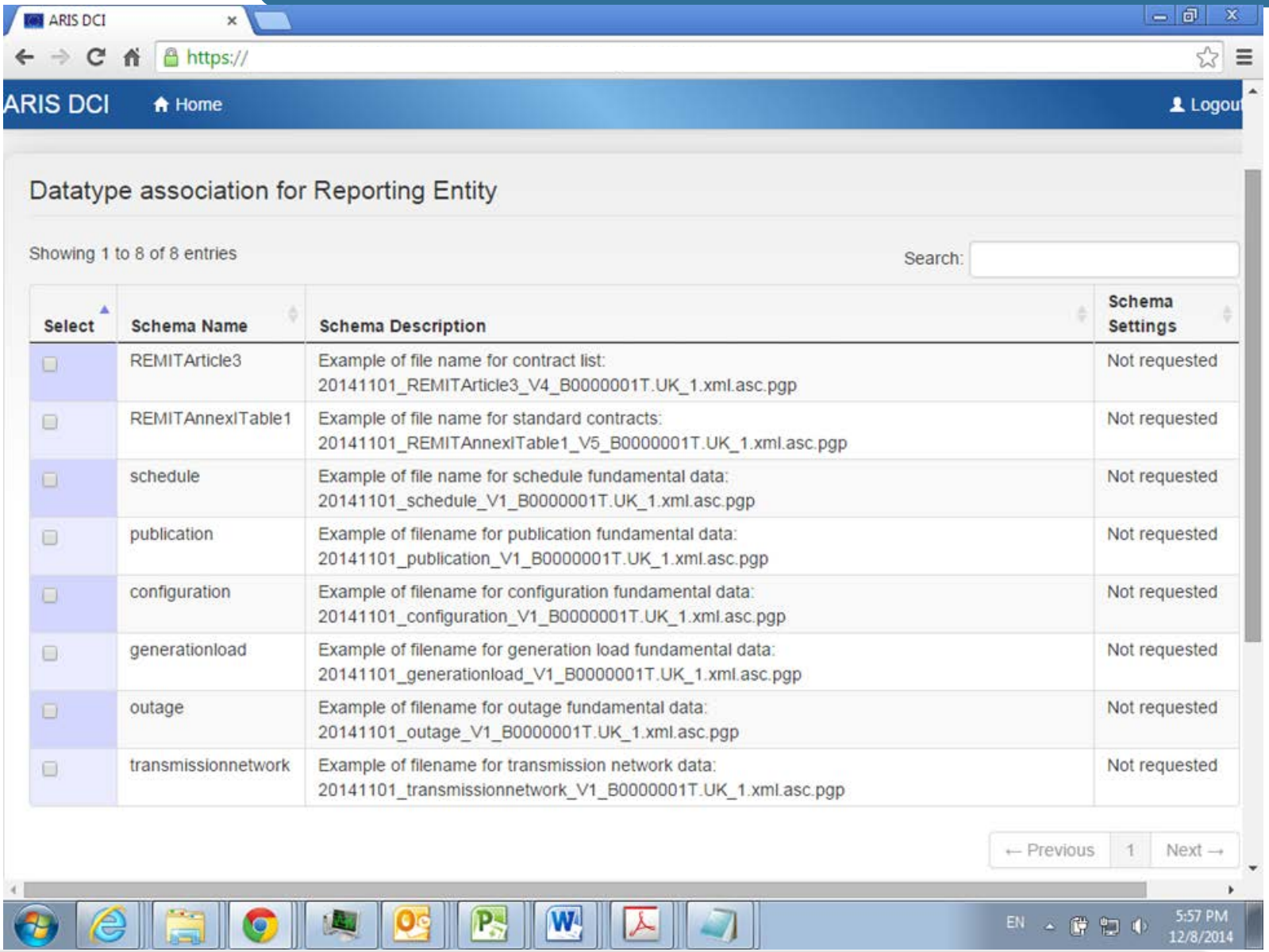
RRM Registration Tool - 8



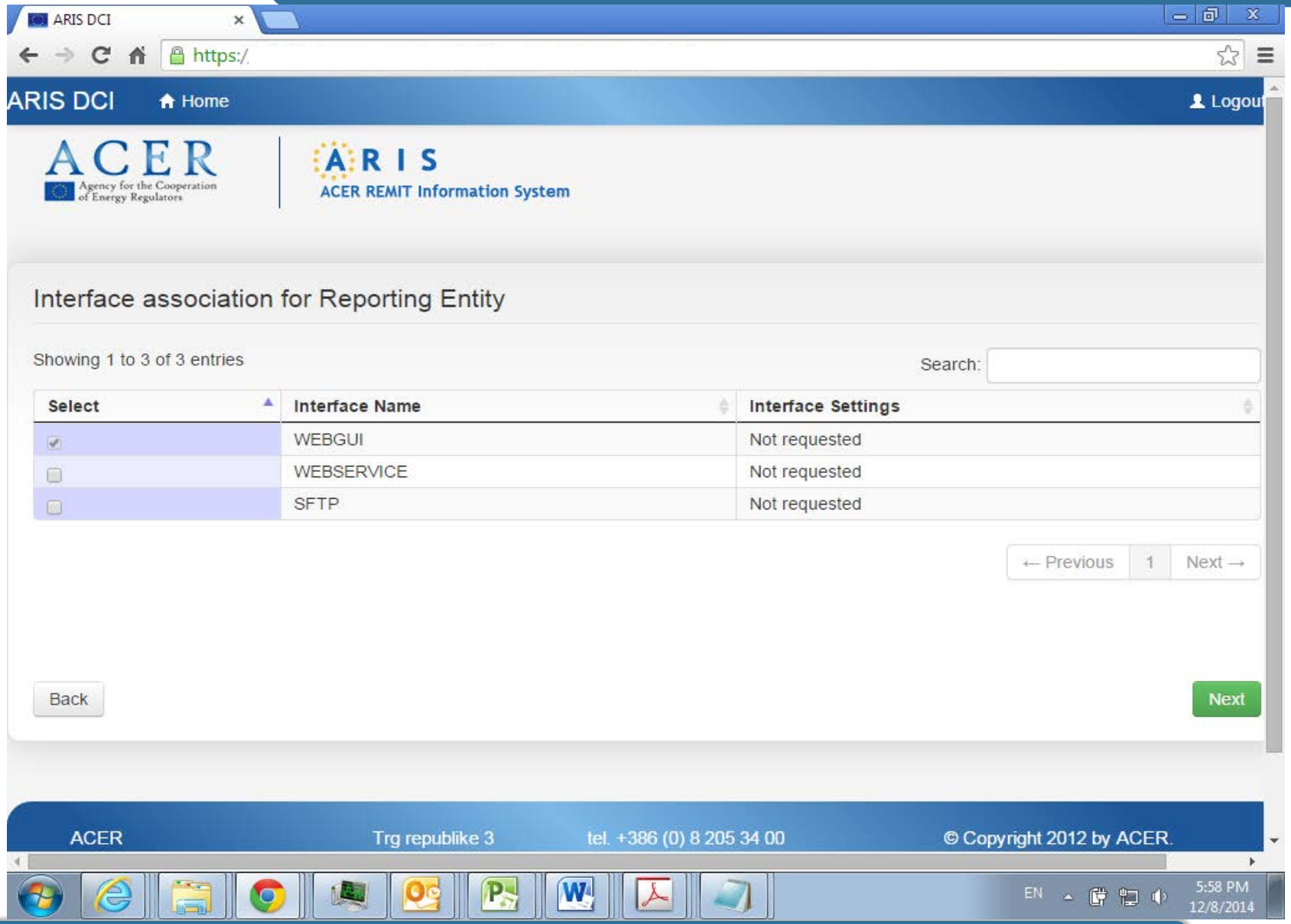
RRM Registration Tool - 9



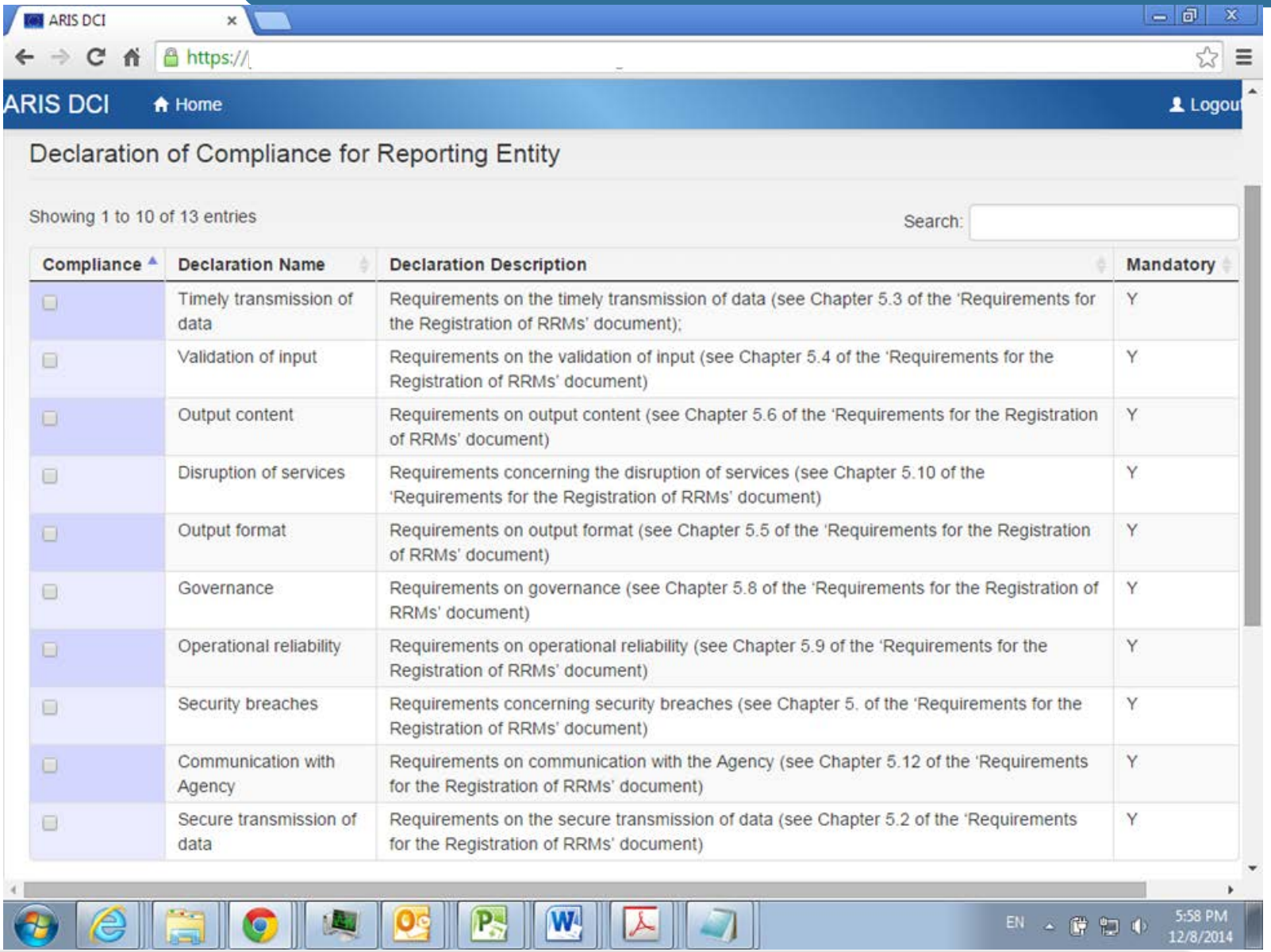
RRM Registration Tool - 10



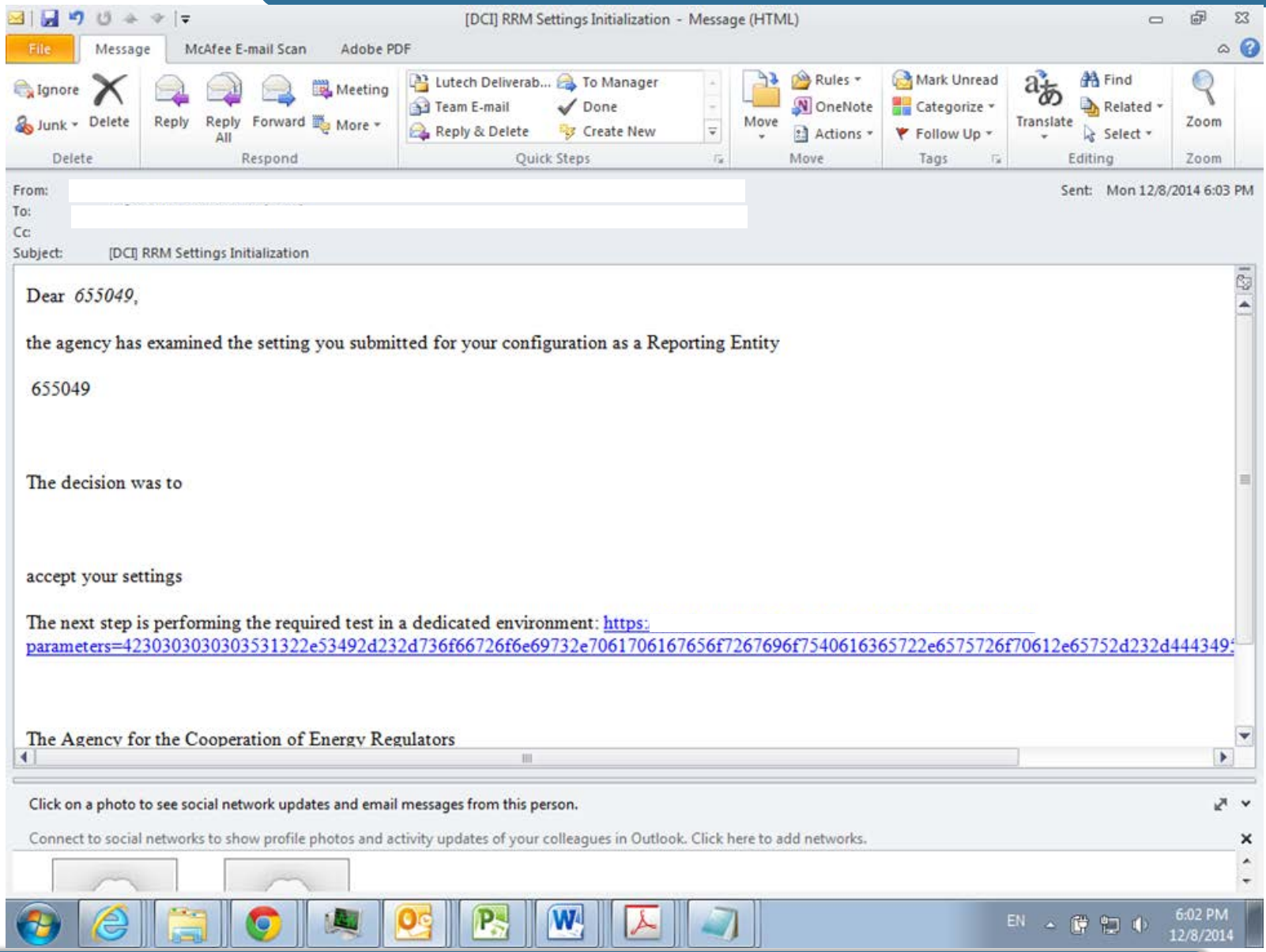
RRM Registration Tool - 11



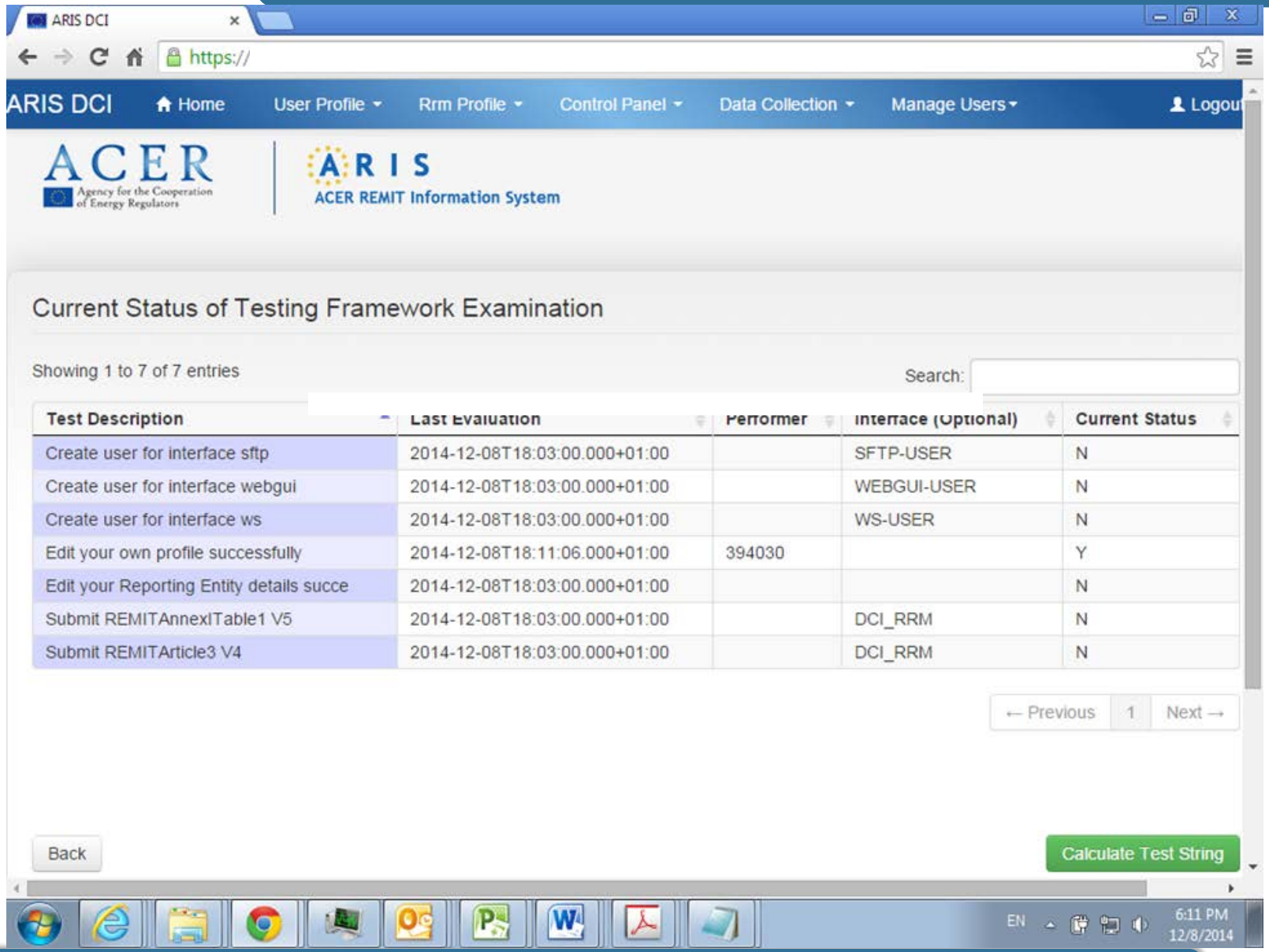
RRM Registration Tool - 12



RRM Registration Tool - 13



RRM Registration Tool - 14



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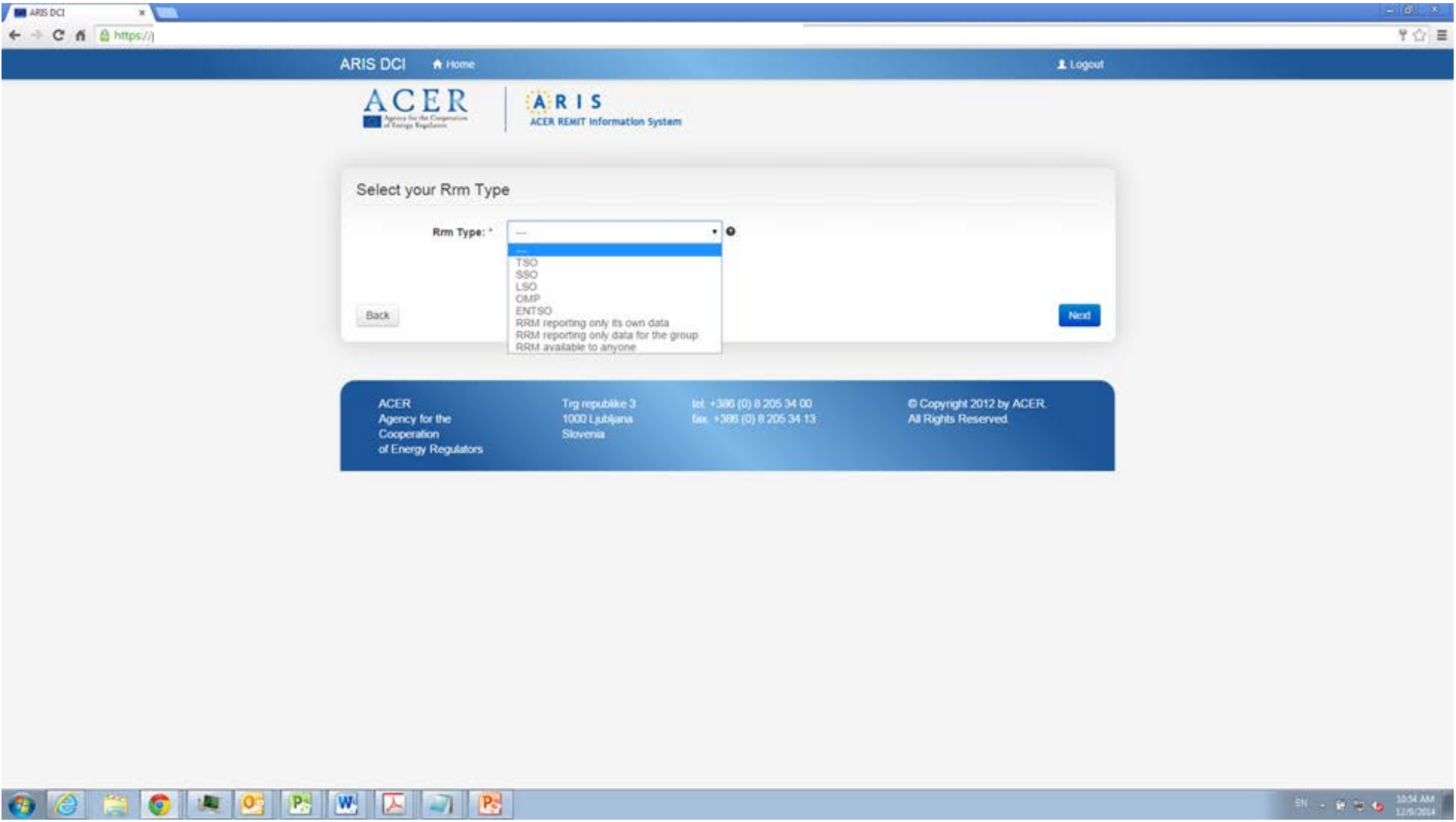
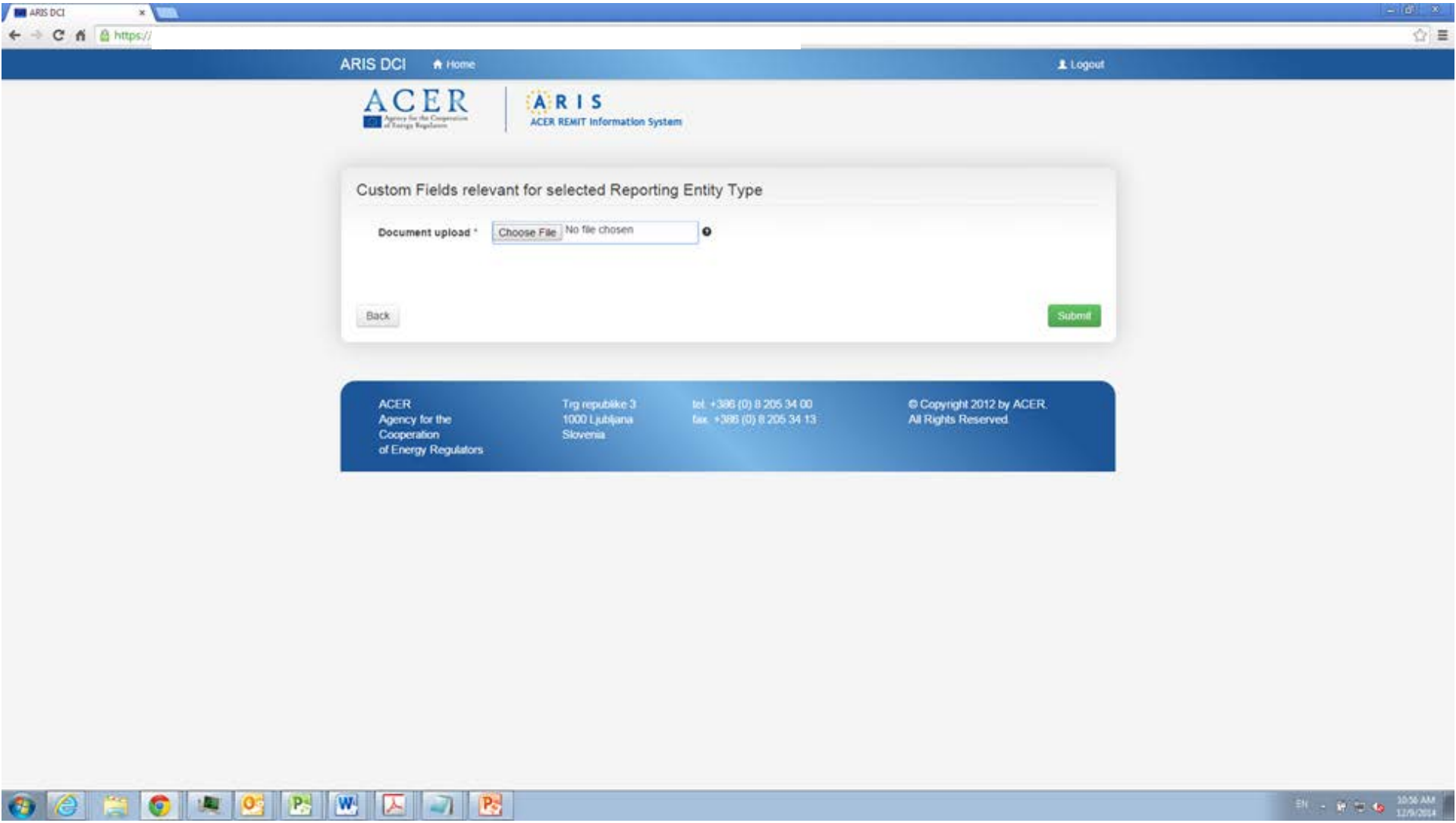


RRM Registration Tool - 16



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