Annex A
Proposed Changes to Electronic Formats for Transaction Data, Fundamental Data and Inside Information Reporting

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Introduction

Annex A contains **Sub-Annexes** reflecting proposed changes, itemised per affected data type, of electronic (XML) formats that are currently used for transaction and fundamental data reporting to the Agency's REMIT Information System (ARIS).

Note that **Sub-Annex A7 contains proposed miscellaneous changes applicable to more than one data type.**

Respondents to this public consultation are kindly invited to submit to the Agency their views on the proposed changes, which are results of the preliminary analysis based on the Agency's data quality experience and the feedback that Registered Reporting Mechanisms (RMMs) have provided to the Agency.

The form for providing respondents' view on changes listed in Annex A is available in Annex B. We kindly request that respondents use separate forms when providing feedback to changes. Example: Comments to changes A1.1, A1.2, B1.3 have to be provided in three forms and each must contain a reference to the proposed change No. ∗ (e.g. A1.1). **Respondents' feedback that does not indicate the Proposed change No. * may not be considered as the Agency cannot make assumptions about which of the proposed changes a respondent is providing feedback to.**

Respondents can provide additional proposals on the changes to electronic formats not listed in Annex A via a form available in Annex C. Please read carefully the existing proposals in Annex A before making proposals. Respondents can also provide other, more general comments on the changes via this form.

A.1 – Proposed changes to reporting standard contracts in accordance with Table 1 of the Implementing Acts

This Sub-Annex lists proposals for changes to REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas used for the reporting of standard and bilateral contracts in accordance with Table 1 of the REMIT Implementing Regulation. Please see the Transaction Reporting User Manual (TRUM) for further details.

Proposed change No. A.1.1

The Agency proposes to stop reporting with the REMITTable_V1.xsd and

REMITTable1_V2.xsd schemas by 31.03.2019 and allow the use of one single schema:

REMITTable1_V3.xsd.

Reason for the change

The majority of RRMs are using REMITTable1_V2.xsd. Seventy percent of all Table 1

data was reported using REMITTable1_V2.xsd. The current schemas have some

limitations and have to be updated. Thus, any approved change of

REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas will be implemented within

REMITTable1_V3.xsd

Proposed change No. A.1.2

The Agency proposes that Data Field No (35) Price and Data Field No (40) Quantity of Table 1 of REMIT Implementing Regulation are reportable within the "*price time interval section*" of REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas instead of their own field.

Currently Data Field No (35) Price and Data Field No (40) Quantity of Table 1 of REMIT Implementing Regulation are reportable with REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas through:

Field No (35) Price:

- REMITTable1 >TradeList>TradeReport>priceDetails>price
- REMITTable1 >OrderList>OrderReport>priceDetails>price

and

Data Field No (40) Quantity:

- REMITTable1 >OrderList>OrderReport>quantity>   value
- REMITTable1 >TradeList>TradeReport> quantity>value

However, when a contract has different prices for each time interval, then Field (57) *"Price/time interval quantity"* applies:

- REMITTable1 >OrderList>OrderReport>priceIntervalQuantityDetails> priceTimeIntervalQuantity>value
- REMITTable1 >TradeList>OTradeReport>priceIntervalQuantityDetails> priceTimeIntervalQuantity>value
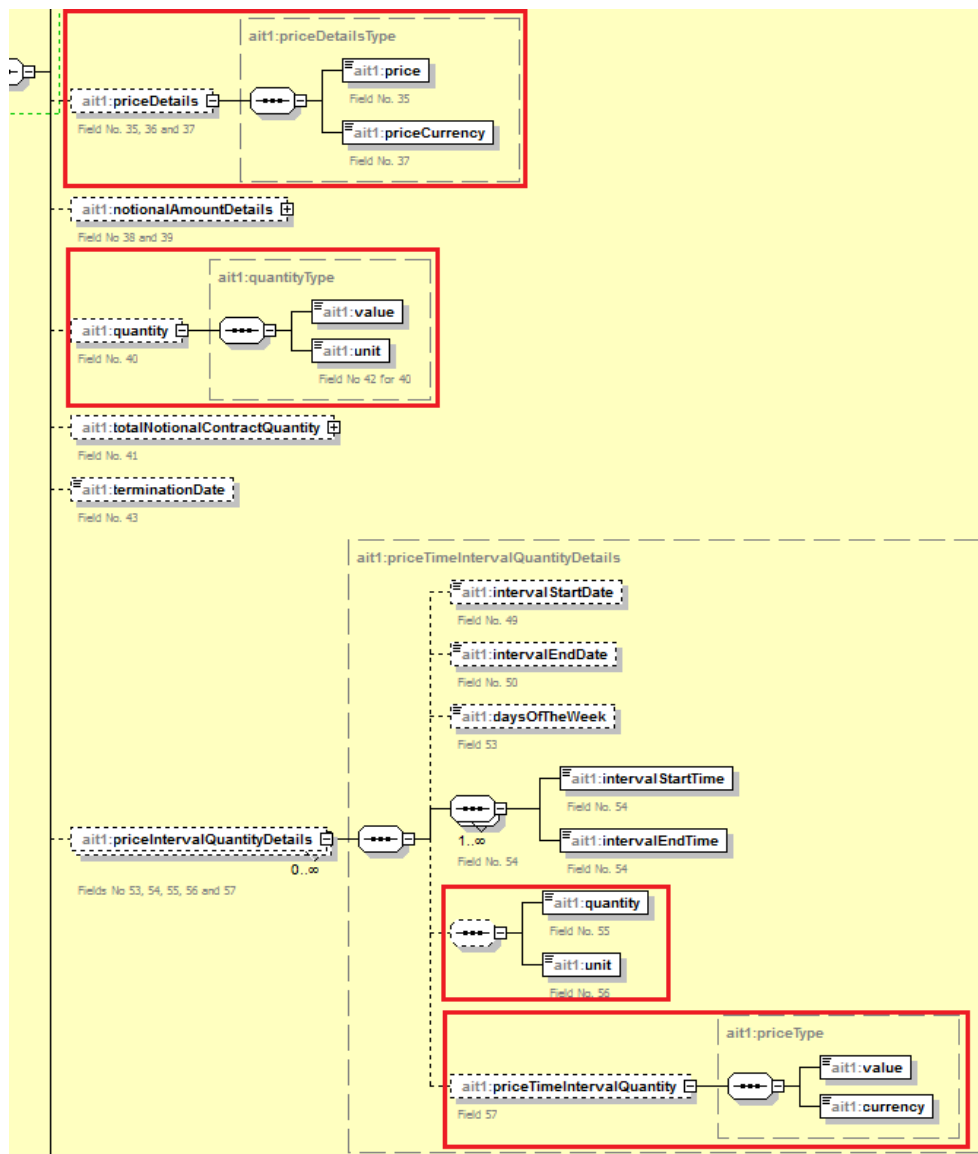
With the proposed amendment, only one section will be filled in:
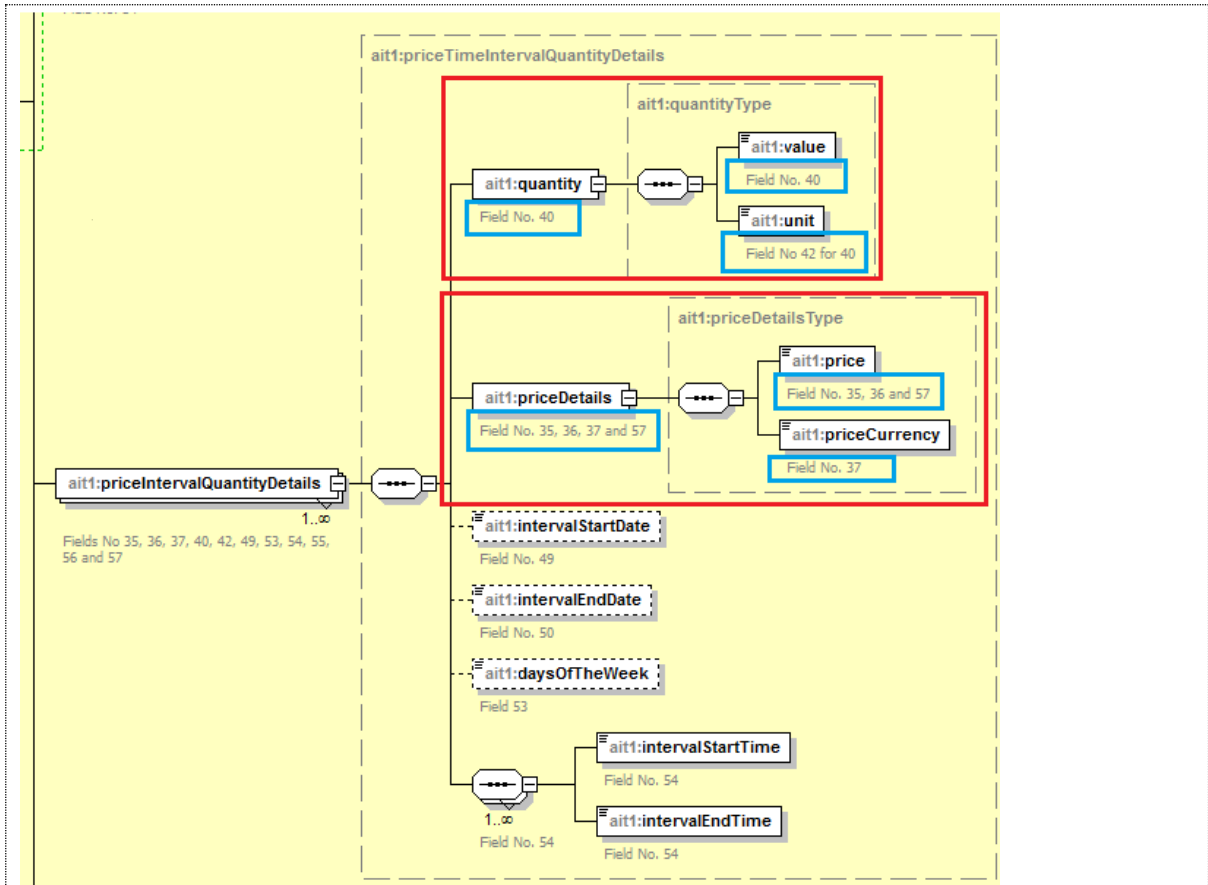
Reason for the change

The simplification of the schema. Reporting entities will not be able to report price and quantity in one or the other section, as this creates inconsistencies in data reporting. This change would therefore enhance data quality for monitoring purposes.

Proposed change No. A.1.3

The Agency was asked to propose a way to harmonise the UTI format with the one used under EMIR, taking into consideration the UTI length and allowed characters.

Currently the REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas allow for the following UTI format:

```
<xs:simpleType name="uniqueTransactionIdentifierType">
        <xs:restriction base="xs:string">
                <xs:maxLength value="100"/>
                <xs:pattern value="[A-Za-z0-9_ -]+"/>
        </xs:restriction>
</xs:simpleType>
```

If harmonised with EMIR, the new UTI format would be:

```
<xs:simpleType name="ACERuniqueTransactionIdentifierType ">
        <xs:restriction base="xs:string">
                <xs:pattern value="[A-Z0-9]{1}[A-Z0-9:\.-_]{0,50}[A-Z0-9]{1}|[A-Z0-9]{1,52}"/>
        </xs:restriction>

    </xs:simpleType>
```

A string of up to 10 capital letters (A-Z), numbers (0-9) or special characters ":", ".", "-", "_". Special characters not allowed at the beginning and at the end.

However, given that the current UTI format length is 100 characters and allows small letters, the Agency seeks to establish whether there is a desire for such a change among the stakeholders and whether they would like to shorten the UTI length from 100 to 52 (and allow capital letters only) or keep the UTI format as it currently is and not make any changes to the current REMIT reporting

Reason for the change

To allow reporting parties to report their trade data under REMIT with the same UTI format of data reported under EMIR.

Proposed change No. A.1.4

The Agency proposes that the element "Index value", which is currently present within the contract section of the schema, is deleted.
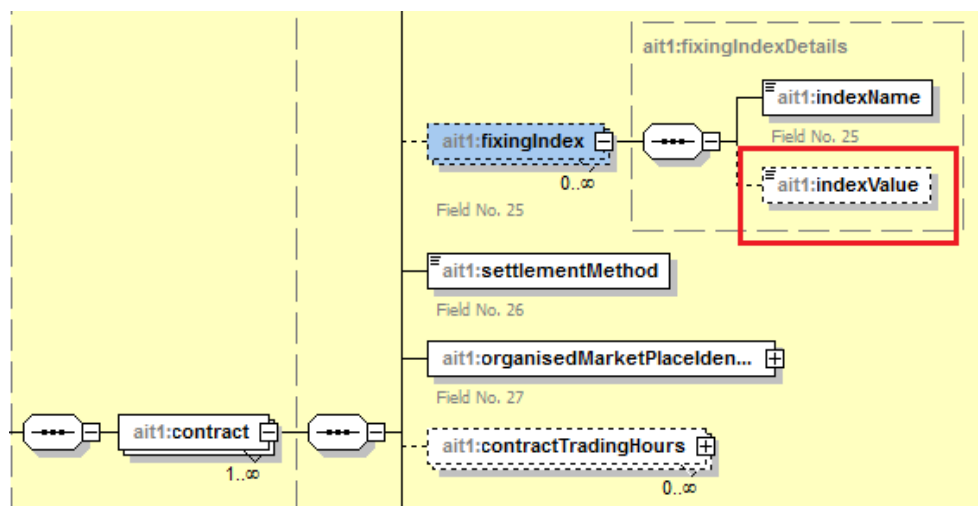
Reason for the change

No contract has an Index Value at the time of reporting. If that were the case, then the value should be reported in the price field.

Proposed change No. A.1.5

The Agency proposes to change the cardinality of Field no (41) "Total notional contract quantity" in REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas from optional to mandatory.

Although some contracts may not have a "Total notional contract quantity" value, i.e. index trades, this field can be reported with a mock value e.g. 9999999.9999.

Reason for the change

To prevent instances of reporting parties failing to report the "Total notional contract quantity". The amendment of the schema in such a way that reporting entities will not have the option to choose whether or not to report "Total notional contract quantity", as this creates inconsistencies in data reporting. This change would therefore enhance data quality for monitoring purposes.

Proposed change No. A.1.6

The Agency proposes that Data Field No (52) "Load type" of REMITTable1_V1.xsd and REMITTable1_V2.xsd schemas changes from optional to mandatory.

Reason for the change

Reporting entities will not have an option to report Data Field No (52) "Load type" or not, as this creates inconsistencies in their data reporting and affects the data quality performance of reporting parties.

The proposed new electronic format reflecting the aforementioned changes is available in Annex D_ XML SCHEMA FOR STANDARD CONTRACTS.

A.2 - Proposed changes to reporting non-standard contracts in accordance with Table 2 of the Implementing Acts

This Sub-Annex lists proposals for changes to the REMITTable2_V1.xsd schema used for the reporting of bilateral non-standard contracts in accordance with Table 2 of the REMIT Implementing Regulation. Please see the Transaction Reporting User Manual (TRUM) for further details.

Proposed change No. A.2.1

The Agency proposes to change the cardinality of Data Field No (32) "Option style" and Field No (33) "Option type" from optional to mandatory, if Field No (13) "Contact type" contains one of the following values: OP, OP_FW, OP_FU or OP_SW.

Some elements within the schema were left optional in order to allow for exceptions and flexibility. However, when a contract has some optionality embedded in it, "Option style" and "Option type" should be filled in.

Reason for the change

To prevent instances of reporting parties failing to report the Data Field No (32) Option style and Data Field No (33) Option type. If the contract includes an option, then both fields have to be filled in.

The amendment of the schema will prevent reporting entities from leaving these fields empty, as this creates inconsistencies in data reporting and affects the data quality performance of reporting parties.

Proposed change No. A.2.2

The Agency proposes that Data Field No (44) "Load type" of Table 2 of REMIT Implementing Regulation changes from optional to mandatory.

Reason for the change

Reporting entities will not have an option to report Data Field No (44) "Load type" or not, as this creates inconsistencies in their data reporting and affects the data quality performance of reporting parties.

The proposed new electronic format reflecting the aforementioned changes is available in Annex D_ XML SCHEMA FOR NON-STANDARD CONTRACTS.

A.3 - Proposed changes to reporting electricity transportation contracts in accordance with Table 3 of the Implementing Acts

This Sub-Annex lists the proposals for a change to Table 3 schemas used for the reporting of electricity transportation contracts in accordance with Table 3 of the REMIT Implementing Regulation. Please see the Transaction Reporting User Manual (TRUM) for further details.

Proposed change No. A.3.1

The Agency proposes to simplify the reporting of electricity transportation contracts data with a new schema based on the technical standards of Table 1 and Table 2 schemas: REMITTable1_V1.xsd/REMITTable1_V2.xsd and REMITTable2_V1.xsd. The new schema will be fully in line with the data fields, defined in Table 3 of the REMIT Implementing Regulation (see Annex D_ XML SCHEMA FOR ELECTRICITY TRANSPORTATION CONTRACTS).

Reason for the change

The schema that is currently used for the reporting of electricity transportation contracts consists of six different "xsd" files and has several mandatory fields that do not need to be reported according to Table 3 of REMIT Implementing Regulation. This obliges market participants to report data that is not listed in Table 3.

The proposed schema will allow market participants to report data only as required by the Regulation.

In addition, the proposed schema would have the same technical standards of Table 1,2 and 4 (e.g. a single file), which will harmonise the reporting of all the different types of transaction data.

Alternatively, respondents may propose changes to the current Table 3 schemas by using the form available in Annex C.

A.4 - Proposed changes to reporting gas transportation contracts in accordance with Table 4 of the Implementing Acts

This Sub-Annex lists proposals for changes to Table 4 schemas used for the reporting of gas transportation contracts in accordance with Table 4 of the REMIT Implementing Regulation. Please see the Transaction Reporting User Manual (TRUM) for further details.

Proposed change No. A.4.1

The Agency proposes to simplify the reporting of gas transportation contracts data with a new schema based on the technical standards of Table 1 and Table 2 schemas: REMITTable1_V1.xsd/REMITTable1_V2.xsd and REMITTable2_V1.xsd. The new schema will be fully in line with the data fields, defined in Table 4 of the REMIT Implementing Regulation (see Annex D_ XML SCHEMA FOR GAS TRANSPORTATION CONTRACTS).

Reason for the change

The schema that is currently used for the reporting of gas transportation contracts consists of five different "xsd" files and has several mandatory fields that do not need to be reported according to Table 4 of REMIT Implementing Regulation. This obliges market participants to report data that is not listed in Table 4.

The proposed schema will allow market participants to report data only as required by the Regulation.

In addition, the proposed schema would have the same technical standards of Table 1, 2 and 3 (e.g. a single file), which will harmonise the reporting of all the different types of transaction data.

Alternatively, respondents may indicate which proposed changes to the current Table 4 schemas they would support. Please see below.

Proposed change No. A.4.2

The Agency proposes to allow the same currencies in Data field No (17) Currency as in non-standard contracts (Table 2):

BGN=Bulgarian lev

CHF=Swiss franc

CZK=Czech koruna

DKK=Danish krone

EUR=Euro

EUX=Euro cent

GBX=Penny sterling

GBP=Pound sterling

HRK=Croatian kuna

HUF=Hungarian forint

ISK=Icelandic króna

LTL=Lithuanian litas

NOK=Norwegian krone

PCT=Percentage

PLN=Polish złoty

RON=Romanian new leu

SEK=Swedish krona/kronor

USD=U.S. dollar

Reason for the change

The only allowed currency at the moment is Euro. Currently, nine EU Member States are not part of the Euro-Zone - where the national currency is Euro. The denomination of tariffs / prices for capacity products of the TSOs from those countries, as allowed by the national laws, are in local currencies. The transactions for those products and services are performed in local currencies.

The tariffs and auction price steps in national currencies are the basis for the trading decisions that a Market Participant makes.

We believe that the monitoring of transactions should be based on the data and conditions that Market Participants were aware of and familiar with when they placed their orders and concluded their trades.

Proposed change No. A.4.3

The Agency proposes that the Data Field No (34) Price paid to TSO (Underlying Price) should be composed in schema of 2 fields: price and currency. The latter is missing, which is why the Agency proposes to introduce in the schema a field for currency with allowed values:

BGN=Bulgarian lev

CHF=Swiss franc

CZK=Czech koruna

DKK=Danish krone

EUR=Euro

EUX=Euro cent

GBX=Penny sterling

GBP=Pound sterling

HRK=Croatian kuna

HUF=Hungarian forint

ISK=Icelandic króna

LTL=Lithuanian litas

NOK=Norwegian krone

PCT=Percentage

PLN=Polish złoty

RON=Romanian new leu

SEK=Swedish krona/kronor

USD=U.S. dollar

Reason for the change

The only allowed currency at the moment is Euro.

Currently, nine EU Member States are not part of the Euro-Zone - where the national currency is Euro. The denomination of tariffs / prices for capacity products of the TSOs from those countries, as allowed by the national laws, are in local currencies. The transactions for those products and services are performed in local currencies. The tariffs and auction price steps in national currencies are the basis for the trading decisions that the Market Participant makes.

We believe that the monitoring of transactions should be based on the data and conditions that the Market Participants were aware of and familiar with when they placed their orders and concluded their trades.

Proposed change No. A.4.4

The Agency proposes to change the schema restrictions to permit multiple codes for the

"ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE" schema field and to add two new codes:

ZSH = Shipper

ZUA = Market Information aggregator

in addition to currently accepted codes:

ZSO = System Operator

ZUJ = Auction office

ZUF = Capacity Platform Operator

Reason for the change

The currently allowed values of the attribute
"ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE" do not cover the case and do not
offer the possibility to define the right market role of the reporting entity when a
Solution provider company (Technical Manager of a system), which is a related
undertaking (subsidiary or parent undertaking) company of a TSO, is reporting data to
ACER on behalf of the TSO and on behalf of other related undertakings with a
holding/company group.

We consider the introduction of the identification of the role of the reporting entities
and the use of the coding ZUA=Market Information Aggregator to be appropriate in
such cases.

Proposed change No. A.4.5

The Agency proposes to add a new accepted codes to the attribute
"PRIMARY_MARKETPARTICIPANT.IDENTIFICATION" (Data Field No (27) Market
participant identification):

-the code "A01" for an ACER code,

-the code "LEI" for Legal Identifier Entity,

-the code "GLN/GS1" or Global Location Number,

-the code "BIC" for Bank Identifier Code

in addition to currently accepted codes "305" – representing an EIC code.

Reason for the change

Other possible codes for the identification of MPs shall be accepted for the facilitation
of data reporting about transactions between two MPs, of which one or both do not
have EIC codes.

The introduction of additional codes will harmonise the codes for the identification of
Market Participants with the codes used in Table 1 and 2.

Proposed change No. A.4.6

The Agency proposes to add a new accepted codes to the attribute
"TRANSFEROR_MARKETPARTICIPANT.IDENTIFICATION" (Data Field No (36) Transferor
identification):

-the code "A01" for an ACER code,

-the code "LEI" for Legal Identifier Entity,

-the code "GLN/GS1" or Global Location Number,

-the code "BIC" for Bank Identifier Code

in addition to currently accepted codes "305" – representing an EIC code.

Reason for the change

Other possible codes for the identification of MPs shall be accepted for the facilitation of data reporting about transactions between two MPs, of which one or both do not have EIC codes.

The introduction of additional codes will harmonise the codes for the identification of Market Participants with the codes used in Table 1 and 2.

Proposed change No. A.4.7

The Agency proposes to add new accepted codes to the attribute "TRANSFEREE_MARKETPARTICIPANT.IDENTIFICATION" (Data Field No (37) Transferee identification):

-the code "A01" for an ACER code,

-the code "LEI" for Legal Identifier Entity,

-the code "GLN/GS1" or Global Location Number,

-the code "BIC" for Bank Identifier Code.

Currently the only accepted code is "305" – representing an EIC code.

Reason for the change

Other possible codes for the identification of MPs shall be accepted for the facilitation of data reporting about transactions between two MPs, of which one or both do not have EIC codes.

The introduction of additional codes will harmonise the codes for the identification of Market Participants with the codes used in Table 1 and 2.

Proposed change No. A.4.8

The Agency proposes that the attribute ORGANISEDMARKETPLACE_MARKETPARTICIPANT.IDENTIFICATION (Data Field No (2) Organised market place identification) is mandatory but DEPENDENT and present ONLY when reporting transactions concluded on an OMP. The attribute is only present when the PROCESS_TRANSACTION.TYPE (Data Field No (9) "Transportation transaction Type") is equal to

ZSW=Ascending clock auction, or

ZSX = Uniform price auction

and other processes executed on an OMP, excluding:

- ZSY = First come first served
- ZSZ = Secondary market procedure

because those transactions do not always or never happen on an OMP.

Reason for the change

Currently the attribute

ORGANISEDMARKETPLACE_MARKETPARTICIPANT.IDENTIFICATION is mandatory. In case of contracts and transactions concluded outside an OMP or concerning points different than these for which the capacity is contracted on an OMP, the reporting entities cannot provide reasonable data in this attribute.

As a workaround, TRUM and Question No 4.2.1 in FAQs on transaction reporting, state that for such cases the reporting entities should use an arbitrary value "21X-XXXXXXXXXXXY".

The proposal would allow to solve the currently existing issue and avoid the use of arbitrary values.

Proposed change No. A.4.9

The Agency proposes an alignment in the namespace of gas capacity allocation schema with the namespace of the rest of the edig@s schemas. This means that the current format of the Gas Capacity Allocation schema namespace:

urn:easee-gas.eu:edigas:remit:gascapacityallocationsdocument:5:1

changes to:

urn:easeegas.eu:edigas:remit:gascapacityallocationsdocument:5:1

Reason for the change

A proposal for the alignment in order to harmonise the naming approach of the same family of schemas.

A.5 - Proposed changes to fundamental data reporting

This Sub-Annex lists proposals for changes to the schemas used for the fundamental data reporting described in the Manual of Procedures (MoP) on transaction data, fundamental data and inside information reporting.

The new schemas that contain the below listed proposals can be found in:

Annex D_ XML SCHEMA FOR LNG DATA

Annex D_ XML SCHEMA FOR GAS STORAGE DATA

The new schemas reflecting the below proposed changes to ENTSOG Fundamental data and Gas Nominations are not included. The Agency will be in contact with ENTSOG in order to create a new version of schemas.

ENTSOG Fundamental data

Proposed change No. A.5.1

The Agency proposes that the element "IDENTIFICATION" in RULES GOVERNING THE TRANSACTION CLASS (Contract Market Monitoring document – Gas Transparency) changes cardinality from mandatory to optional.

Reason for the change

The attribute is mandatory but not applicable for the ENTSOG reporting purposes. There are no transactions that shall and could be identified by ENTSOG because the reporting obligations of ENTSOG simply consist of transferring to ARIS the fundamental data that has been published in an aggregated manner by the TSOs on the ENTSOG Transparency Platform.

Information about any of the transactions is not available at the ENTSOG TP and it is not possible for ENTSOG to populate this mandatory attribute.

Proposed change No. A.5.2

The Agency proposes to add new field(s) RESPONSIBLETSO_MARKETPARTICIPANT.IDENTIFICATION + Coding scheme for the identification of the TSO on whose behalf ENTSOG is reporting data to ACER as part of the RULES GOVERNING THE CONTRACTMARKETMONITORING_DOCUMENT CLASS.

The following values should be allowed for the TSO identification:
- the code "A01" for an ACER code,
- the code "LEI" for Legal Identifier Entity,
- the code "GLN/GS1" or Global Location Number,
- the code "BIC" for Bank Identifier Code,

- the code "305" representing an EIC code.

Reason for the change

Currently, the schema does not make it possible for ENTSOG to indicate which TSO published the data that is included in and submitted to ACER report. This is why ENTSOG and the ACER team agreed to use as a workaround the field TRANSACTION IDENTIFICATION, which is mandatory in the same schema but cannot be populated by ENTSOG because it is not relevant to the ENTSOG reporting process nor to the scope of data that ENSTOG reports to ACER.

In order to avoid using inappropriate fields for the identification of the TSO whose TP data is reported to ACER, we consider as reasonable the introduction of a new special attribute.

Gas nominations

Proposed change No. A.5.3

The Agency proposes an alignment in the namespace of gas nomination monitoring schema with the namespace of the rest of the edig@s schemas. This means that the current format of the Nomination Monitoring schema namespace:

urn:easee-gas.eu:edigas:remit:nominationmonitoringdocument:5:1
changes to:

urn:easeegas.eu:edigas:remit:nominationmonitoringdocument:5:1

Reason for the change

A proposal for the alignment in order to harmonise the naming approach of the same family of schemas.

Proposed change No. A.5.4

The Agency proposes to remove the ZSO code as an identifier in the code schema of gas nomination monitoring schema and to add the codes from the REMIT Implementing regulation. Currently, the schema uses the following three codes for the identification of market participants/TSO/shipper:

- The code "305" for an EIC party code.
- The code "A01" for an ACER code.
- The code "ZSO" for a TSO managed code.

Thus, the following values would be allowed for the identification:

- the code "A01" for an ACER code,

- the code "LEI" for Legal Identifier Entity,

- the code "GLN/GS1" or Global Location Number,

- the code "BIC" for Bank Identifier Code,

- the code "305" representing an EIC code.

Reason for the change

ZSO will be removed since the Agency does not have access to the ZSO register and cannot identify the parties. The Agency therefore proposes to use the codes from the Implementing regulation No. 1348/2014, which, in addition to the ACER and EIC code, permits Legal Entity Identifier (LEI), Bank Identifier Code (BIC), Energy Identification Code (EIC), Global Location Number (GLN/GS1). Impacted attributes are: INTERNAL_MARKETPARTICIPANT.IDENTIFICATION, ISSUER_MARKETPARTICIPANT.IDENTIFICATION

RECIPIENT_MARKETPARTICIPANT.IDENTIFICATION

RESPONSIBLETSO_MARKETPARTICIPANT.IDENTIFICATION

INTERNALACCOUNT

INTERNALACCOUNTTSO

EXTERNAL ACCOUNT

EXTERNAL ACCOUNTTSO

ISSUER_MARKETPARTICIPANT.MARKETROLE.CODE

RECIPIENT_MARKETPARTICIPANT.MARKETROLE.CODE

Proposed change No. A.5.5

The Agency noticed the typographical error in the schema relation between gas direction and timeseries (RULES GOVERNING THE TIMESERIES CLASS) which is incorrectly referenced in the schema as timseries.

Reason for the change

The correction of the typographical error in the word timeseries that has been referred to as "timseries", with the letter e missing after tim.

LNG Data

Proposed change No. A.5.6

The Agency proposes to introduce the specific field "lngFacilityOperatorIdentifier",
placed within the element "lngUnavailabilityReport", which must reference the market
participant whose reporting obligations are fulfilled with the reported
"lngUnavailabilityReport".

Reason for the change

At the moment, the market participant whose reporting obligations are fulfilled with
the particular report is not clearly identified.

Proposed change No. A.5.7

The Agency proposes to add two new accepted codes for market participant identifiers
to the current identifiers, which will allow market participants to be identified with one
of the following accepted values:

-the code "A01" for an ACER code (existing code)

-the code "LEI" for Legal Identifier Entity (existing code),

-the code "GLN/GS1" or Global Location Number (NEW code),

-the code "BIC" for Bank Identifier Code (NEW code),

-the code "EIC" for the Energy Identification Code (existing code).

Reason for the change

Other possible codes for the identification of market participants shall be accepted for
the facilitation of data reporting. The introduction of additional codes will harmonise
the codes for the identification of Market Participants used in other REMIT schemas.

Gas Storage data

Proposed change No. A.5.8

The Agency proposes that in the REMITStorageSchema, storageFacilityReport the additional value*"GRP" ("Storage group)"* is inserted among acceptable values for the "storageType" field.

Reason for the change

Each of the currently listed permitted storage types (DSR) (ASR) (ASF) (SGL) (PPC) (GHT) (SRC) cover only the identification of an individual storage facility. These cannot be used for the identification of a storage group. A storage group can be composed as a mix of different types of storage facilities. An example is a storage group called 'Basic underground storage' and is composed of three storage facilities that are grouped: Yela = Aquifer (ASR) + Marismas = depleted field (DSR) + Serrablo = depleted field (DSR). In order to be able to complete this field appropriately and identify storage group datasets the Agency proposes to introduce an additional storage type "GRP" (= Storage Group).

A.6 - Proposed changes to inside information reporting

This Sub-Annex lists proposals for changes to the schemas used for the inside information reporting described in the Manual of Procedures (MoP) on transaction data, fundamental data and inside information reporting.

The new schemas that contains the below listed proposals can be found in:

Annex D_XML SCHEMA FOR INSIDE INFORMATION REPORTING

Gas Inside Information

Proposed change No. A.6.1

The Agency proposes to change Field No (16) Affected Asset or Unit of the UMM schema №2 "Unavailabilities of gas facility in a way that all assets or/and units affected by an outage or unplanned maintenance **(a single event affecting multiple assets in the same way i.e. same timing)** can be published within a single report.

The Unavailability report will contain a repeatable set of data fields that identify the affected asset or unit, the balancing zone to which it belongs to and the details of technical, available and unavailable capacity during the period of outage or unplanned maintenance.

Reason for the change

Currently, the UMM schema №2 "Unavailabilities of gas facilities" allows market participants to announce an interruption event for one single asset or unit per message which makes it impossible to report multiple affected assets within one report. As it often happens during a period of outage or unplanned maintenance that many assets and/or units are affected TSOs have to publish consequences of the same event in multiple reports; which is cumbersome and might cause inconsistency.

An improvement of the REMIT data quality and a simplification of the reporting approach.

Proposed change No. A.6.2

The Agency proposes to change the accepted values of the Data Field (8b) Unit of measurement and to add a new unit "GWh/h" and remove the existing unit "mcm/d". Thus, the allowed units for gas UMMs will be: kWh/d, kWh/h, GWh/h, GWh, GWh/d, TWh.

Reason for the change

An alignment of units of measurement used for the reporting of gas storage and inside information will allow for consistent and unified reporting of data.

Proposed change No. A.6.3

The Agency proposes to introduce the new accepted value "Storage facility unavailability" among the list of accepted values in the Data Field No (4/b) Type of Event.

Reason for the change

The current schema does not allow reporting the unavailability of the whole gas storage facility with just one UMM report. In order to report the unavailability of the whole gas storage facility market participants have to report three UMM reports: one UMM report with the Type of Event "Storage unavailability", one UMM report with the Type of Event "Injection unavailability" and one UMM report with the Type of Event "Withdrawal unavailability" . The proposal limits the number of UMMs that market participants have to publish.

Electricity Inside Information

Proposed change No. A.6.4

The Agency would like to consult on whether the change would be beneficial for electricity UMMs.

The Agency proposes to change the UMM schema in a way that all assets and/or units affected by an outage or unplanned maintenance (a single event affecting assets in the same way i.e. same timing) can be published with a single report.

Reason for the change

Currently, the UMM schema "Unavailability of electricity facilities" allows MPs to announce an interruption event for one single asset or unit per message, which makes it impossible to report multiple affected assets within one report. As it often happens during a period of outage or unplanned maintenance that many assets and/or units are affected, market participants or TSOs have to report consequences of the same event in multiple reports which is cumbersome and might cause inconsistency.

A.7 - Proposed miscellaneous changes applicable to more than one data type

This Sub-Annex lists miscellaneous schema change proposals applicable to more than one data type. The below proposals are reflected in the schemas available from Annex D.

Table 1 and Table 2

Proposed change No. A.7.1

The Agency proposes that all fields related to "datetime/timestamps" in Table 1 and Table 2 schemas only allow four digits for the year.

Reason for the change

An alignment of the format of year reporting with the stored data in the Oracle database.

Proposed change No. A.7.2

The Agency proposes that each element of the type "datetime" in Table 1 and Table 2 schemas includes an enforcement of the applicable pattern in regard to the local time zone. No time zone offset or zoned time (with offset) is required.

Reason for the change

The alignment of the format of "datetime" across the REMIT reporting schemas would ensure more clarity than just a stipulation in the guidelines that the reported time should refer to the certain time zone.

Proposed change No. A.7.3

The Agency proposes that default values in mandatory fields are removed from the schemas. The schemas will have empty mandatory fields and reporting parties will have to fill the mandatory fields with a valid value in order to comply with the schema.

Reason for the change

This would prevent reporting parties from <u>unintentionally</u> reporting default valid values.

Proposed change No. A.7.4

The Agency proposes that the UTI type in Table 1 and Contract ID in Table 2 schemas does not allow the use of space characters.

Reason for the change

A space within an identifier can cause issues and should not be allowed.

Proposed change No. A.7.5

The Agency proposes that the present pattern of the element "Extra" in Table 1 and Table 2 schema is changed to

"\w+==((\d+\.\d+)|(\d+)|(\w+))(;\w+==((\d+\.\d+)|(\d+)|(\w+)))*"

allowing the reporting of only one pair and not two pairs, as is presently required.

Reason for the change

The reduction of the restriction to one pair and the simplification of the use of the field "Extra".

All data types (where relevant)

Proposed change No. A.7.6

The Agency proposes that all mandatory schema elements that are of type string and have only maximal length defined have also minimal length=1.

Reason for the change

Following a good practice of the XML element/attribute definition.

Proposed change No. A.7.7

The Agency consults on the approach to introduce validation rules on mandatory fields, where appropriate, see some examples in the Reason for the change below.

Reason for the change

As examples, it is expected that the elements

"Rights_MarketDocument/mRID", "Rights_MarketDocument/TimeSeries/mRID", "PartyID" in Table 3

 "GasCapacityAllocations_Document/identification",

"GasCapacityAllocations_Document/process_Transaction.identification",

"GasCapacityAllocations_Document/Transportation_Transaction/identification" in Table 4

"lngFacilityOperatorIdentifier", "ParticipantType" in REMIT LNG data reporting

with mandatory cardinality also have an appropriate value.

This change would therefore enhance data quality for monitoring purposes.

LNG and Gas Storage Data

Proposed change No. A.7.8

The Agency proposes to introduce into the LNG and Gas Storage schemas the same lifecycle mechanism that exists in REMIT Table1 and REMIT Table2 allowing for corrections, modifications and cancelations of previously reported records. Thus, the field for Action type will have the following possible values:

- New
- Modify
- Error
- Cancel.

Reason for the change

Currently, it is not possible to update or to cancel the submitted LNG or GAS STORAGE files. The same lifecycle mechanism as for REMIT Table1 and REMIT Table2 will be applied.

Proposed change No. A.7.9

The Agency proposes to align the units of measurement in the REMIT Storage and REMIT LNG schemas with the units for gas UMM reporting.

Current restrictions for REMIT Storage and REMIT LNG schema:

cm, cm/d, mcm, mcm/d, kWh, kWh/h, kWh/d, GW, GWh, GWh/h, GWh/d, MW, MWh, MWh/h, MWh/d, TWh, Therm/d, kTherm/d, MTherm/d, Therm, kTherm, MTherm, %.

The proposal is to limit the restrictions to

kWh/d, kWh/h, GWh/d, GWh, TWh, GWh/h.

Reason for the change

The alignment of units of measurement in REMIT Storage and LNG schemas with the units for UMM reporting will allow consistent and unified reporting.

Proposed change No. A.8.1

The Agency proposes that storage and LNG facilities (fields "storageFacilityIdentifier" and "lngFacilityIdentifier") are identified with EIC W and Z codes only. Currently, the schema allows the identification of facilities also with ACER and LEI codes. ACER and LEI identifiers should be removed from the facility identifiers.

Reason for the change

ACER and LEI identifiers should be removed because their purpose is to identify Market Participants and not assets.

Inside Information

Proposed change No. A.8.2

The Agency proposes to introduce two new elements "intervalStart" and "intervalStop" into the complex type "capacity" and make the complex type repeatable. The change is applicable to both gas and electricity UMM schema.

Reason for the change

Currently, the UMM schema allows only for one outage value per defined time period. If the available/unavailable capacity fluctuates over time market participants have to publish every change of available/unavailable capacity in a separate UMM even if the outage values and affected time periods were known in advance. Several Inside Information Platforms have implemented a way to publish this information as if it were one UMM, but these values and time slots must be split in the 'back end'.

This would be a significant change, not only on the technical implementation side. For this reason, the Agency would like to receive opinion whether such a change would be welcomed by Inside Information Platforms. The Agency also welcomes views on

whether this change should be applied to only one type of UMMs (gas or electricity) or both.

Notwithstanding the challenges, the benefit to the market would be easier reporting and potentially fewer revisions or updates to UMMs for these kinds of outages.

Proposed change No. A.8.3

The Agency proposes to change the Data Field No (17) Affected Asset or Unit EIC Code from optional to mandatory.

Reason for the Change

These EIC codes will help the Agency link affected assets or unit to the market participant(s) and fundamental data received.