How to Resolve REMIT Reporting Problems: View from Gazprom Export

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GAZPROM EXPORT

1. Lack of operational contact with ACER

ACER published several issues of «Frequently asked questions on transaction reporting» (FAQs), but a set of questions under consideration is limited and rarely updated. Though a market participant may send their question to ACER using query form, the answer to it will not be available until next FAQs update.

ACER — Agency for the Cooperation of Energy Regulators

Frequently Asked Questions (FAQs) on REMIT transaction reporting

Version history

Version	Effective Date
Frequently Asked Questions (FAQs) 1.0	8 September 2015
Frequently Asked Questions (FAQs) 2.0	16 November 2015
Frequently Asked Questions (FAQs) 3.0	16 February 2016
Frequently Asked Questions (FAQs) 4.0	24 March 2016
Frequently Asked Questions (FAQs) 5.0	26 September 2016

2. Absence of detailed instructions on filling certain fields in REMIT templates

A good example of blank spot in Transaction Reporting User Manual (TRUM) is the price formula reporting scheme for non-standard contracts. It should be reported in simplified form, but there are no rules for such simplification.

3. Absence of unified rules for Registered Reporting Mechanism providers (RRMs)

RRMs, used by market participants for REMIT reporting, have different functionality with regard to filling the templates. In some situations technical restrictions may hinder the execution of ACER requirements.

Data Field No (15) Price or price formula

No.	Field Identifier	Description
15	Price or price formula	Fixed price or price formula used in the contract.

This field identifies the agreed price per unit of energy as expressed in field 20. In case of options, this field represents the premium. If the contract includes a price formula this shall be reported in this field.

The Agency understands that a price formula may be very complex and may not be represented in the same way in the systems of the two counterparties to the contract. When the price formula is very complex, market participants should report a simplified version of the formula.

For instance, we don't have an ability to disclose certain contract volume obligations for different time intervals due to our RRM restrictions: there is just one numerical field for this contractual parameter. Meanwhile most of our counterparties don't have this problem.

4. Contradictions in ACER documents

Market participants normally fill the templates using TRUM, its annexes and FAQs, but these documents may contain contradictory instructions. For example, according to TRUM, the two sides of contract should match their UTI when sending executions for bilateral contracts. However FAQ5.0 specifies, that each counterparty may use it's own UTI.

5. Difficulties of data coordination with counterparties

Every market participant reports data to ACER based on their own understanding of contradictory clauses. This situation complicates the coordination of data between two counterparties.

TRUM 2.2

Data Field No (31) Unique transaction ID

No.	Field Identifier	Description
31	Unique transaction ID	Unique identifier for a transaction as assigned by the organised market place of execution, or by the two market participants in case of bilateral contracts to match the two sides of a transaction.

For bilateral trades that take place outside an organised market place, the two market participants shall assign the same UTI to their trade reports.

FAQ 5.0

**II.3.4   Executions under non-standard contracts**

Question 3.4.1

The Unique Number can be any number the market participant likes as long as it is unique for that market participant and not used for other executions. It could be, for example, any progressive unique number for the market participant who is reporting the execution.

There is no expectation that the buyer and seller unique number for the execution will have to be the same. This is a unique number that will identify the report uniquely.

Though there are no unified rules for RRM, we can see their intention to cooperate with clients and to facilitate operations within the reporting system.

Since we started reporting our contractual obligations in July 2016, our RRM has taken some steps to upgrade existing functionality:

- created a web-query for its clients to find out system weaknesses, so we were able to send our proposals directly to the RRM;
- upgraded Excel-files for REMIT reporting and translated them to English;
- created a statistics dashboard on company's reporting web-page;
- simplified the search of already uploaded reports.

RRM Service

My Company
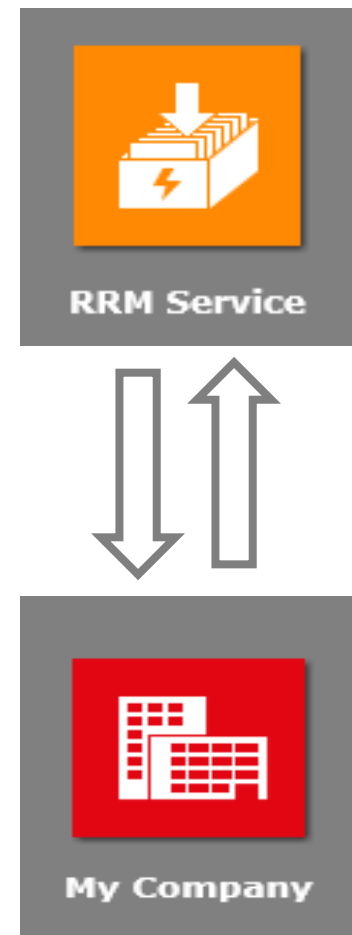
Some sort of a more immediate feedback is required by the industry players. For instance, a personal space within ACER website (with networking optionality) for those responsible for REMIT reporting is a solution.

Such functionality could add new instruments for getting up-to-date information:

- chats/forums (communication with ACER representatives & other users responsible for REMIT reporting);

- direct e-mails with updates
  (in order to stay aware of the latest regulation changes);

- electronic cross-references between documents.