

**ACER**

Trg republike 3  
1000 Ljubljana, Slovenia

11<sup>th</sup> December 2014

Re: IOGP's response to ACER's Public Consultation on the provisional REMIT list of organised market places

IOGP is welcoming the publication of such a list as it will be key in allowing Market Participants (MPs) to differentiate standard and non-standard reporting. We regret however that the list of standard contracts is not following the same timeline.

The proposed list looks overall of a good quality.

We would suggest to filter the OMPs per commodity (gas or/and power) to improve user-friendliness.

Besides the above general comments, the answers to the consultation question can be found below:

- 1. Please provide us with your comments on the draft list of organised market places. Do you see any omissions or errors in the list? Do you think that any organized market place or any information on organised market places is missing, that should be published in order to facilitate transaction reporting under REMIT? Please comment especially the potential organised market place status of those entities marked with an asterisk that had not registered themselves as organised market places at the time when this public consultation was launched. Please justify your reply.**

We confirm that the following OMPs should be on the list:

- # 33OPCOM.
- # 37PXE a.s. (Power Exchange Central Europe)
- #39 BGC Partners
- #40 CIMD (Corretaje e Información Monetaria y de Divisas S.A.)
- #42 GFI Group Inc.
- # 43 Griffin
- #48 Spectron
- #52 42 Financial Services

The following OMPs were in our opinion omitted:

- BRM (Bursa Romana de Marfuri)/RCE (Romania commodity Exchange)
- IDEX (Italian Derivatives Energy Exchange)
- Enterprise Commodity Services Limited
- OTCex SA
- CASC.EU – Capacity Allocating Service Company

- 2. Virtual trading points (VTPs) are currently not included in the draft list of organized market places, unless they provide brokering services or are considered as an**

**energy exchange. Do you agree with this approach? If not, please justify your reply.**

We agree with the current approach of not including VTPs.

- 3. For the reasons stated above (see point 1. in paragraph 4 of this consultation paper), the Agency currently believes that primary auction platforms for transportation contracts do not have to be listed as organised market places. Do you agree with this approach? Please justify your reply.**

We agree with the approach and the justification given by ACER

- 4. The final list of organised market places is supposed to include organised market place IDs for the purpose of facilitating transaction reporting under REMIT. Do you agree that the list of organised market places should make this information publicly available? If not, please justify your reply.**

We agree.

- 5. The list of organised market places is supposed to be updated in a timely manner. The Agency is currently intending to update the list on a regular basis as and when required, in particular as and when the Agency is given further information on gaps. Do you agree with this approach? If not, please justify your reply.**

We agree. We would also emphasize the need for ACER to put in place a transparent and predictable process for updates. Updates should be shared with MPs with sufficient notice so that appropriate and timely adjustment can be made in their compliance processes. We would also encourage ACER to plan for a regular feedback from MPs on the content of the list.