

**SEM REMIT Reporting Q&A**

SEMO is registered with ACER as an Organised Market Place (OMP). Article 6 of the Commission Implementing Regulation (EU) No 1348/2014, provides that *“The organised market place where the wholesale energy product was executed or the Order was placed* ***shall at the request of the market participant offer a data reporting agreement****.”* Therefore SEMO, acting under the EirGrid Group, will fulfil the role of a Registered Reporting Mechanism (RRM).

Market Participants will be required to complete a “Request to Report” template requesting SEMO to act as RRM on their behalf. In the case where a unit owner is not a Party to the Trading and Settlement Code but acting through an Intermediary, then the Intermediary will be obliged to complete the request. Please refer to question two below for more details on this.

SEMO is exploring a Modification to the Trading and Settlement Code to capture where applicable, relevant REMIT reporting details.

The following are a list of questions which have been raised with SEMO either during or after the SEMO REMIT Reporting workshop.

1. **Q: When completing Phase 2 of the Market Participant registration, if requesting SEMO to report, do I include SEMO as a ‘Delegated Party under Section 5?**

A: In accordance with ACER documentation, if SEMO is the entity chosen to report then as the OMP on which the transaction was executed there is no requirement to identify SEMO as the Delegated Party. SEMO is currently liaising with ACER with regard to our registration as an RRM.

1. **Q: Can an Intermediaries request that SEMO report for REMIT on behalf of the generator owner?**

A: At the REMIT Reporting workshop SEMO communicated that we will issue a ‘Request to Report’ template to Market Participants. This template will be a formal notification from Market Participants to SEMO requesting us to act as their Registered Reporting Mechanism (RRM) and report to ACER on their behalf. SEMO requires this formal notification for compliance purposes.

As you are aware a number of Parties are acting as an Intermediary in the SEM. It is the Intermediary who accedes to the Trading and Settlement Code and submits all relevant data on behalf of the relevant unit owner. It is the Intermediary therefore that should complete the ‘Request to Report’ template clearly stating all units for which they request SEMO to report. It is up to the Intermediary and unit owners to liaise directly with regard to the relevant units to be reported on.

1. **Q: Will there be a service charge for REMIT reporting carried out by SEMO?**

A: SEMO is striving to deliver the least cost solution for both system change and operational costs. SEMO expects these costs will be recovered under existing regulatory arrangements. However, as outlined at the workshop, the costs and associated recovery mechanisms are yet to be finalised and agreed with the RAs.

1. **Q: What data is covered by REMIT Reporting carried out by SEMO?**

A: If requested the data to be reported through SEMO as an Organised Market Place is ‘Standard Contract’ data. This includes Orders and Trades at a unit level. For REMIT reporting purposes, Orders will be in the form of Bids and Offers (including Standing Bids & Offers where relevant) but will not include Start Up Costs and No Load Costs. Trades will be in the form of Market Schedule Quantities or Modified Interconnector Unit Nominations.

1. **Q: What Unit Types will be reported on to ACER?**

A:SEMO understands that the unit types to be reported on include all units which submit Commercial Offer Data (Bids & Offers or Nomination Profiles):

* Price Makers including DSUs which are classed as generator units in the SEM
* Price Takers
* Interconnector Units
* Variable Price Takers

In accordance with Article 3(2) of the Implementing Acts and as previously presented by ACER *“information shall be submitted before trading commences in that particular contract”*. On that basis, SEMO understands that while suppliers in the SEM do consume energy from the pool, they do not submit bids/offers and are not settled until after the timeline for data submission to ACER. Therefore, there is no requirement to report for suppliers in the SEM.  Likewise Autonomous Price Takers do not submit Commercial Offer Data (Bids & Offers or nomination profiles).

1. **Q: If Participant Orders/Bids do not result in Trades, will Orders still be reported to ACER?**

A: Yes, Orders will still be reported in this instance to ACER.

1. **Q: Is it only Ex-Ante (as opposed to ex-post) SEM data being reported to ACER?**

A: As stated above in line with Article 3(2) only Orders and Trades for Day-ahead and Within-Day contracts (e.g. EA, EA2 and WD1) will be sent. To send Ex-Post which is after “trading commences” would not, as SEMO understands it, be in line with the Implementing Acts and ACER’s guidance.

1. **Q: How will Orders and Trades be mapped in files sent to ACER?**

A: Orders and Trades will be mapped to the applicable Market Participant ACER Code for REMIT purposes.

1. **Q: What provisions are in place for revised data and how will this be sent to ACER?**

A: It is SEMO’s understanding where it states in Article 3(2) *“Organised markets shall submit updates of the information as changes occur”* that the clause *“before trading commences”* takes precedence, i.e. if changes occur after submitting to ACER and before trading commences. SEMO will be sending the data after gate closure therefore no updates can occur before (or indeed after) the MSP is run (day-ahead contract). Consequently there is no requirement to send revised data. Specifically in relation to Modified Interconnector Unit Nominations, in the event of an Interconnector Trip resulting in a revision to Modified Interconnector Unit Nominations, the revised MIUNs will not be sent.

1. **Q: What are the provisions for reporting if an MSP run is cancelled?**

A: SEMO will report each run as ‘New’ unless the MSP run is cancelled. In the event that an MSP run has been cancelled, Orders will still be reported; however, Trades or MSQs/MIUNs will be set to zero. In addition the related submission to ACER will flag the Order and Trade as “Cancelled”.

1. **Q: How will SEMO trace back rejections to individual Participants?**

A: If a file is rejected the response from ACER will detail the reason for rejection. SEMO will use the response as an initial investigation into the issue.

1. **Q: What is the process for amending rejected files?**

A: SEMO will identify the data record that is causing the submission to fail and amend and resubmit to ACER if required.

1. **Q: How are outages or trips accounted for in the reporting?**

A: For scheduled outages, Orders will reflect what has been submitted; however Trades will be reported as zero. If an Interconnector and/or Generator Unit(s) trips during the Trading Day (i.e. after Gate Closure, MSP Run and submission to ACER) this data will not be sent to ACER.

1. **Q: Will Capacity Payment data be reported?**

A: No, SEMO will not be reporting settlement data such as capacity payments and charges to ACER.

1. **Q: How can Market Participant’s gain visibility of any data submitted to ACER?**

A: This is still under discussion at ACER and a process will be put forward in due course. Once SEMO has visibility of this we will communicate it.

1. **Q: Can receipts received from ACER be provided to Market Participants?**

A: Receipts will be based on file submissions; as SEMO will be sending data for all Market Participants who have requested this service in one submission (as requested by ACER), only one receipt will be received from ACER for all data submitted. This submission process does not support provision of receipts on a ‘per Participant’ basis.

1. **Q: Will the receipts be archived?**

A: Yes, all data files submitted to and receipts from ACER will be archived.