

REMIT: An Industry Perspective

John Lawlor

Chair, NEAI Markets Committee

About NEAI



- Trade Association representing the electricity industry on the island of Ireland
- Eurelectric national member for Ireland
- Membership:

Generation

AES	Energia
BG Energy	ESB EI
Bord na Mona	SSE
Endesa Ireland	Synergen
Tynagh Energy	

Supply

Airtricity
BGE Energy
Energia
Electric Ireland

Networks

ESB Networks Ltd.
NIE T&D

REMIT: NEAI VIEWS



- Increased Transparency



- Prohibition on Insider Trading



- Lack of Clarity



Clarification Sought



What are the transparency requirements?

- How do participants comply?
- Is there a de-minimis size issue for compliance?
- What publication routes are envisaged?
- Does it apply to Interconnectors?
- Divergent views of DG Comp versus RAs regarding disaggregated information.
 - Are RAs satisfied that competition laws are not breached?

SEM Interpretation 1



- Built-in Transparency
 - Timing of Publication of data could be improved
 - Real-time Availability data
- Different information requirements to BETTA

SEM Interpretation 2



- Minimise Regulatory Impact and Costs
- Maximise central system data usage
 - *‘The reporting obligations on market participants shall be minimised by collecting the required information or parts thereof from existing sources where possible.’ (Article 8 par. 5 of REMIT 1227/2011)*

Conclusion



- Central Role for RAs to ensure cost-effective implementation
- NEAI members would welcome working with RAs to achieve this