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ACER – Agency for the Cooperation of Energy Regulators
Public Consultation Paper (PC_2014_R_02)

OPINION RELATED TO THE TRADE REPORTING USER MANUAL (TRUM)

First of all, a lot of thanks to ACER (Agency for the Cooperation of Energy Regulators) for organising this very interesting public consultation.

This opinion represents an opinion of an individual citizen, not any legal entity.

This opinion does not contain:

- any business secrets
- any trade secrets
- any confidential information.

This opinion is public.

ACER can publish this opinion on a relevant web page.

Annex 2 holds information about disclaimers and copyright.

Best Regards,

Jukka S. Rannila
citizen of Finland

signed electronically

[Continues on the next page]

44

45 **1. General: Previous consultations**

46

47 I gave earlier opinions to ACER, and PDF files of those opinions are on the following addresses:

48

49 EN: Opinion 34: REMIT Registration Format

50 http://www.jukkarannila.fi/lausunnot.html#nro_34

51

52 EN: Opinion 43: Publication of extracts of the European register of market participants

53 http://www.jukkarannila.fi/lausunnot.html#nro_43

54

55 (REMIT: Pursuant to Article 9(3) of Regulation (EU) No 1227/2011 of the European Parliament
56 and of the Council of 25 October 2011 on wholesale energy market integrity and transparency)

57

58 SO, in this Opinion there should be some new insights related the publication of Trade Reporting
59 User Manual (TRUM).

60

61 **2. General notes of the ARIS / The Agency's REMIT Information System (ARIS)**

62

63 There are several mentions about the ARIS, but the implementation of ARIS is somewhat unclear in
64 this phase. I have to reiterate again (cf. previous opinions) the maximum solution for the ARIS:

65 * ACER owns the machinery and processor of the information system (e.g. ARIS)

66 * the machinery and processor are based on relevant open standards

67 * the operating system is based on an open-source solution

68 * ACER owns the source code of the information system

69 * ACER owns the database of the information system

70 * the database is based on open-source solution and on relevant open standards.

71

72 Naturally ACER can use technologies, which are developed in an open environment, but these open
73 technologies can be the base for actual solutions with direct ownership.

74

75 **ACER will most probably face a fierce resistance from several stakeholder**
76 **groups when/if ACER is demanding total ownership of the whole information**
77 **system, e.g. ARIS.**

78

79 Therefore the technological implementation of a (new) ARIS should be totally controlled by ACER,
80 and the providers of different technologies should not create any technological lock-ins for ACER.
81 The data in ACER systems should be totally controlled by ACER in all phases of the life cycle of
82 the ACER systems.

83

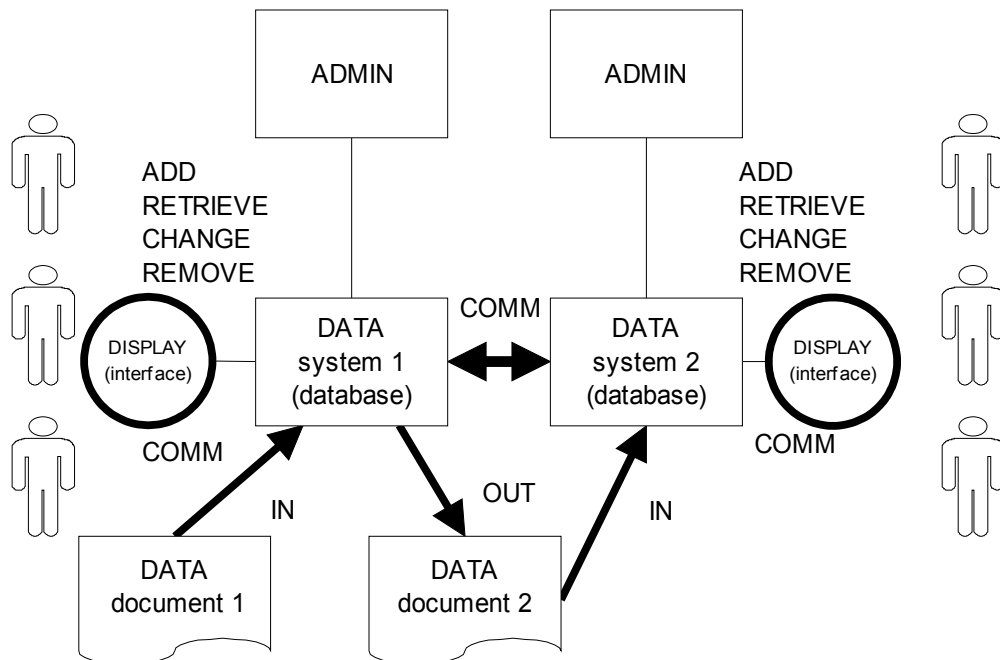
84 **3. Simple conception of information systems**

85

86 The following figure gives us four basic functions: add, retrieve, change and remove. Then there are
87 databases and documents used in different systems. Users use different displays (interfaces).

88 Different systems need administration (e.g. maintenance) for keeping a system functional. Then

89 there is communication (also standards) for direct and indirect usage of an information system.
 90



91
 92

93 **4. Internal identifier / Field 0**

94

95 There is some text about ACER code and other codes.
 96 Field No 1 is following: “ID of the market participant or counterparty”.

97

98 There could be field No. 0, which could be following: “Internal ID for internal usage of the system.”
 99 The internal ID will help in situations, when there is need to change information in other fields. The
 100 business of different communities can change; for example there can be mergers of different
 101 communities and/or a community can be divided to two “new” parts.

102

103 With the internal ID (Field No. 0) it is easier to handle situations in the form of different companies.

104

105 **Proposal 1: There could be an internal identifier (Field No. 0) for the ARIS system.**

106

107 **5. Need for very detailed technical consultation?**

108

109 There is mentioning on the consultation document of following issues:

110

* ACER Requirements for Registered Reporting Mechanisms (RRM)

111

* ACER Technical Specifications for Registered Reporting Mechanisms (RRM)

112

113 It can be concluded, that these two documents can be highly technical. However, there could be a
 114 consultation based on these technical documents, and the main target audience could be chief
 115 information officers in different stakeholder communities and/or specialist of information system

116 providers in different communities. In some communities, consulting information system providers
 117 (and subcontractors) of those communities may result need for highly detailed technical
 118 specifications.

119

**Proposal 2: ACER could organise a technical consultation about ACER system(s)
 based on very detailed technical issues.**

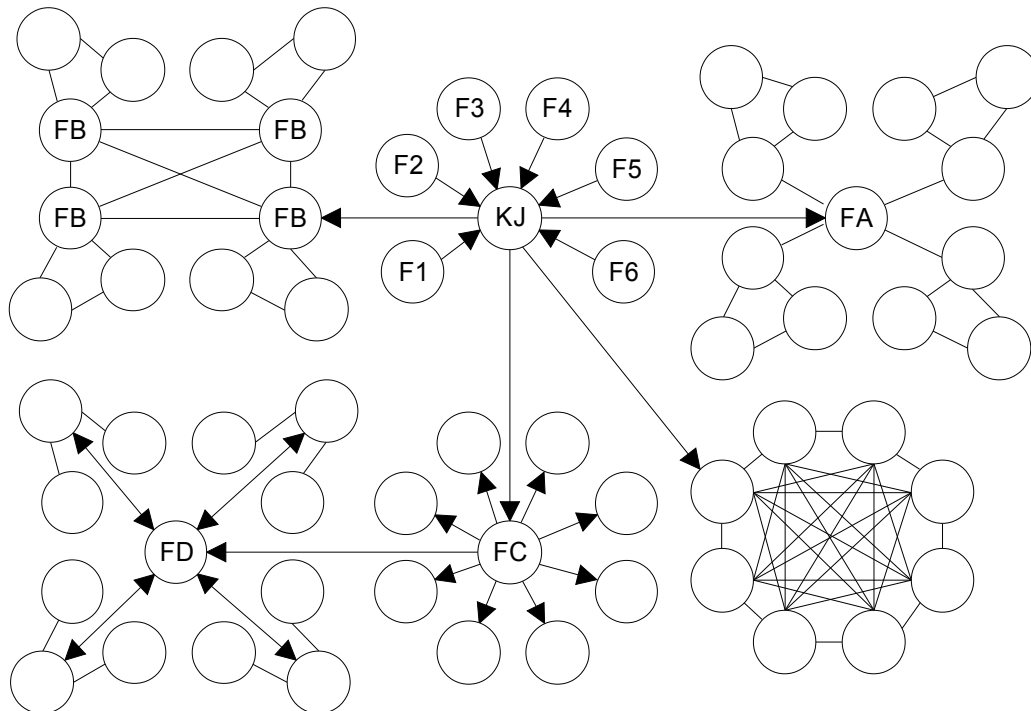
122

6. The number of needed standards and different standard versions?

124

125 ARIS has four tiers presented on the draft of “Trade Reporting User Manual (TRUM)”. In each tier,
 126 there are actually several other systems, which are connected to ARIS system. Therefore, the
 127 number of needed standards can be considerable, and the high level design is just a starting point for
 128 assessing needed standards and/or standardisation.

129



130

131

132 The previous figure is a conception if this situation: in reality there are several versions of different
 133 standards (Formats). Different standard (Formats) versions is a serious issue, when there are
 134 possibly tens of different systems cooperating with ACER systems.

135

136 Since different systems are layered, this means need for using several version of standards (formats)

137

7. Web feed (or news feed) / An example of two standards

139

140 One important feature to all modern systems is naturally providing different web feeds, check the
 141 symbol below.



142
143

144 Web feeds ¹ can be used by several different systems, and the classification of systems can be based
145 on several needs:

- 146 * different user classes
- 147 * daily feeds
- 148 * weekly feeds
- 149 * monthly feeds.

150

151 **Proposal 3: ACER could create different web feeds (or news feed) based on the needs of**
152 **different stakeholders.**

153

154 ACER could provide different web feeds based on the current information needs after consulting
155 different stakeholders.

156

157 One example is naturally, that there is Atom ² standard and RSS ³ standard for web feeds. Some
158 systems use Atom standard and some systems use RSS standard, and possibly ACER has to provide
159 both feeds.

160

161 **Proposal 4: ACER has to assess need for implementing RSS feeds in ACER systems.**

162 **Proposal 5: ACER has to assess need for implementing Atom feeds in ACER systems.**

163

164 **8. Other feeds / Possibly XML / An example of a standard / Another example: CSV**

165

166 Then there is the question of creating other feeds based on XML.

167

168 **Proposal 6: ACER could collect information about existing other XML feed formats,**
169 **i.e. not only RSS feeds.**

170 **Proposal 7: ACER has to critically assess developing new XML feed formats.**

171

172 One serious option is naturally transmitting CSV ⁴ documents (Comma-separated values), since
173 CSV usage (in and out) is implemented in several systems.

174

175 **Proposal 8: ACER could collect information about CSV usage and/or CSV**
176 **implementation in different stakeholder systems.**

177

178 **9. Checking standards developed by standard setting organisations (SDO)**

179

180 There are hundreds of different standard setting organisations (SDO), and one comprehensive list is

1 http://en.wikipedia.org/wiki/Web_feed, Web feed -Wikipedia article

2 <http://tools.ietf.org/html/rfc4287>, The Atom Syndication Format

3 <http://www.rssboard.org/rss-specification>, RSS 2.0 Specification

4 http://en.wikipedia.org/wiki/Comma-separated_values, comma-separated values (CSV) -Wikipedia article

181 provided ⁵ for us by ConsortiumInfo.org.

182

183 **Proposal 9: ACER could systematically assess existing standard setting organisations**
184 **(SDO) and assess standards provided by those communities.**

185 **Proposal 10: The number of redundant standardisation efforts should be minimal.**

186

187 After serious assessment of standardisation landscape, the needed number of different standards is
188 actually known as a verified fact. Depending on the situation, ACER can make a feasible and
189 reasoned decision of standards, which could be used in ACER systems.

190

191 One option is participate in standardisation efforts, which can be donations to standardisation
192 communities and/or participating in standardisation efforts. Actually participating in standardisation
193 efforts means actually dedicating real work time and real workforce for standardisation.

194

195 **10. Field 1 / TRUM**

196

197 **Proposal 11: The length of this field could be e.g. 50 alphanumerical characters, since**
198 **some of the codes can be very long.**

199

200 **11. Field 23 / TRUM**

201

202 **Proposal 12: Should there be two fields:**

203 **1) Identifier for organised market place?**

204 **2) Actual identifier provided by market place?**

205

206 Since these identifiers are provided by external communities, the nature of those external
207 communities can change in time and space, e.g. mergers.

208

209 **12. Field 26 / TRUM**

210

211 The decision to use just one timestamp information (UTC time) is very good, since timezone
212 information can be calculated based one timestamp information (UTC time).

213

214 **13. Field 27 / TRUM**

215

216 The length of this field not defined.

217

218 **Proposal 13: Should this field definition be “Up to 52 alphanumerical digits”?**

219

220 One thing is, that there can be several versions of different contracts, even though contracts can be
221 with the same name.

222

223 **Proposal 14: Should there be a field for managing versions of different contracts?**

224

5 <http://www.consortiuminfo.org/links/linksall.php>, Standard Setting Organizations and Standards List

225 **14. Fields 48 / TRUM**

226

227 Most probably the examples should be in the following formats:

228 2014-01-29

229 2014-02-28

230 2014-03-31

231

232 **15. Abbreviations / TRUM**

233

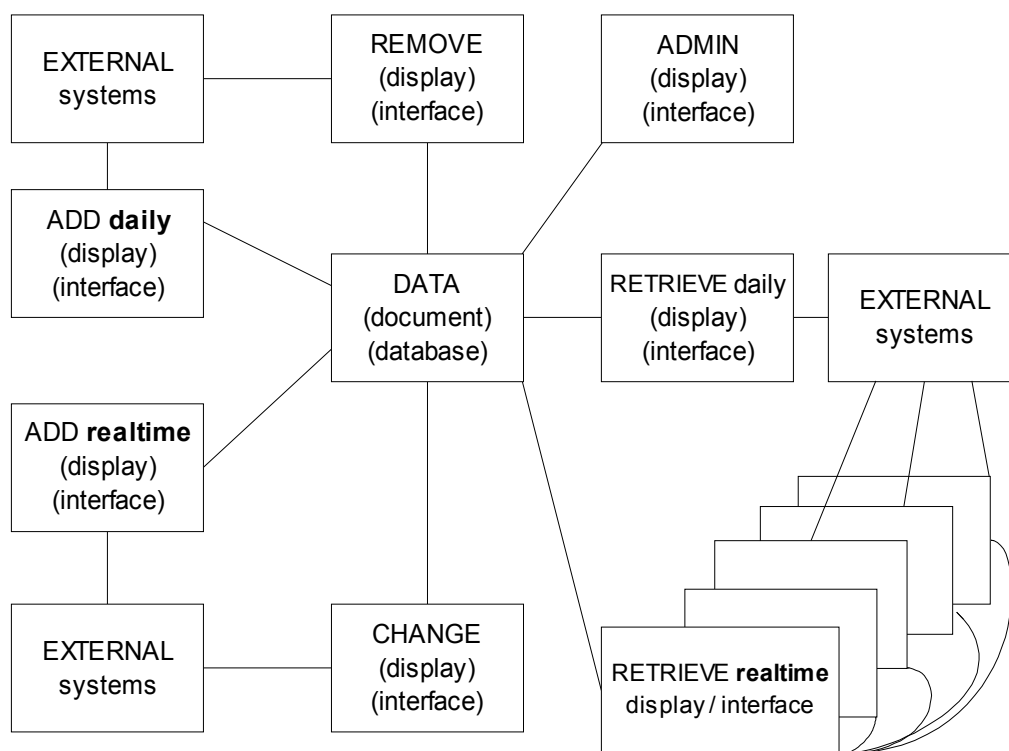
Proposal 15: All abbreviations should be before actual text.

234

235 **16. The need for replicated systems?**

236

237



238

239

240 There is not much mentioning about replicating some ACER systems. The figure above tries to give
 241 an example of system replication. Since the retrieval is the mostly used function, possibly there can
 242 be replicated systems for retrieval, e.g real-time search and archival search can be in different
 243 systems. Also add function can be e.g. realtime or daily.

244

Proposal 16: The need for replicated (ACER) systems has to be assessed seriously.

245

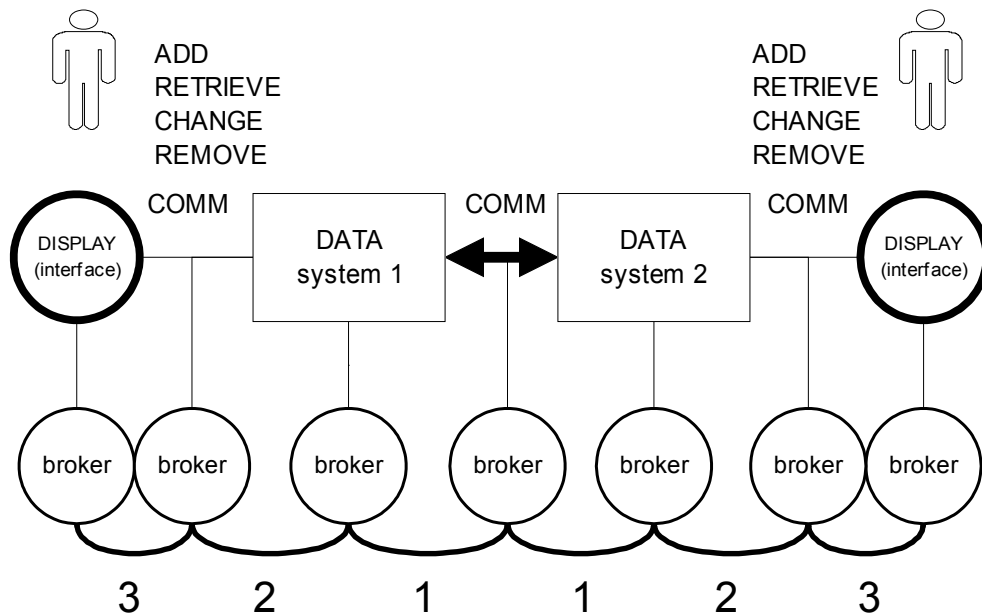
246

247 **17. The need for brokered systems**

248

249 One aspect is different brokered systems, which are usually “Trusted third parties”. E.g online

250 shopping systems need a broker for transmitting actual payments from customers to sellers.
 251



252
 253
 254 Possibly ACER systems are actual brokers, and different systems then rely on ACER systems as
 255 “Trusted third parties”. Possibly ACER systems has to use “broker systems”, which are needed for
 256 over-all functioning of ACER systems with different stakeholder groups.

257
 258 **Proposal 17: The number and nature of different broker systems has to be assessed**
 259 **carefully.**

260
 261 **18. Concluding remarks**

262
 263 Developing new information systems are never easy, and ACER systems are not exceptions.
 264 Therefore there are always different possibilities for having serious problems with with (new and
 265 old) information systems.

266
 267 Like said before, using different experts in different phases of ACER system(s) development can
 268 result some success.

269
 270 **19. Good luck!!!**

271
 272 This opinion is quite limited. Hopefully there are constructive ideas presented in other opinions.
 273 This remains to be seen.

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ANNEX 1

My opinions to the previous and relevant consultations – there consultations were mostly organised by the Commission of the European Union. General page to all consultations – both in English and in Finnish: <http://www.jukkarannila.fi/lausunnot.html>

EN: Opinion 1: Review of the rules on access to documents

http://www.jukkarannila.fi/lausunnot.html#nro_1

EN: Opinion 2: Schools for the 21st Century

http://www.jukkarannila.fi/lausunnot.html#nro_2

EN: Opinion 3: The future of pharmaceuticals for Human use in Europe- making Europe a Hub for Safe and Innovative medicines

http://www.jukkarannila.fi/lausunnot.html#nro_3

EN: Opinion 5: Consumer Scoreboard, Questionnaire for stakeholders

http://www.jukkarannila.fi/lausunnot.html#nro_5

EN: Opinion 6: Consultation on a Code of Conduct for Interest Representatives

http://www.jukkarannila.fi/lausunnot.html#nro_6

EN: Opinion 8: European Interoperability Framework, version 2, draft

http://www.jukkarannila.fi/lausunnot.html#nro_8

EN: Opinion 9: CAMSS: Common Assessment Method for Standards and Specifications, CAMSS proposal for comments

http://www.jukkarannila.fi/lausunnot.html#nro_9

EN: Opinion 15: Collective Redress

http://www.jukkarannila.fi/lausunnot.html#nro_15

EN: Opinion 17: Opinion to Antitrust Case No. COMP/C-3/39.530

http://www.jukkarannila.fi/lausunnot.html#nro_17

EN: Opinion 18: Opinion Related to the Public Undertaking by Microsoft

http://www.jukkarannila.fi/lausunnot.html#nro_18

EN: Opinion 19: Official Acknowledgement by the Commission

http://www.jukkarannila.fi/lausunnot.html#nro_19

- 319 EN: Opinion 20: SECOND Opinion Related to the Public Undertaking by Microsoft
320 http://www.jukkarannila.fi/lausunnot.html#nro_20
321
- 322 EN: Opinion 21: Opinion about the European Interoperability Strategy proposal
323 http://www.jukkarannila.fi/lausunnot.html#nro_21
324
- 325 EN: Opinion 23: Public consultation on the review of the European Standardisation System
326 http://www.jukkarannila.fi/lausunnot.html#nro_23
327
- 328 EN: Opinion 27: Public Consultation on the Modernisation of EU Public Procurement Policy
329 http://www.jukkarannila.fi/lausunnot.html#nro_27
330
- 331 EN: Opinion 28: Consultation on the Europe 2020 Project Bond Initiative
332 http://www.jukkarannila.fi/lausunnot.html#nro_28
333
- 334 EN: Opinion 30: Internet Filtering
335 http://www.jukkarannila.fi/lausunnot.html#nro_30
336 NOTE: Organised by the European Committee for Standardization (CEN) ⁶
337
- 338 EN: Opinion 32: COMP/C-3/39.692/IBM – Maintenance services
339 http://www.jukkarannila.fi/lausunnot.html#nro_32
340
- 341 EN: Opinion 34: REMIT Registration Format
342 http://www.jukkarannila.fi/lausunnot.html#nro_34
343 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER) ⁷
344
- 345 EN: Opinion 35: Exploiting the employment potential of the personal and household services
346 http://www.jukkarannila.fi/lausunnot.html#nro_35
347
- 348 EN: Opinion 37: CASE COMP/39.654 - Reuters instrument codes
349 http://www.jukkarannila.fi/lausunnot.html#nro_37
350
- 351 EN: Opinion 39: Registry options to facilitate linking of emissions trading systems
352 http://www.jukkarannila.fi/lausunnot.html#nro_39
353
- 354 EN: Opinion 40: Media Freedom and Pluralism / audiovisual regulatory bodies
355 http://www.jukkarannila.fi/lausunnot.html#nro_40
356
- 357 EN: Opinion 41: AT.39398: observations on the proposed commitments
358 http://www.jukkarannila.fi/lausunnot.html#nro_41
359
- 360 EN: Opinion 42: Opening up Education
361 http://www.jukkarannila.fi/lausunnot.html#nro_42

6 <http://www.cen.eu/> (Accessed 2 July 2012)

7 <http://www.acer.europa.eu/> (Accessed 2 July 2012)

362

363 EN: Opinion 43: Publication of extracts of the European register of market participants

364 http://www.jukkarannila.fi/lausunnot.html#nro_43

365 NOTE: Organised by The Agency for the Cooperation of Energy Regulators (ACER)

366

367 EN: Opinion 44: Evaluation policy guidelines

368 http://www.jukkarannila.fi/lausunnot.html#nro_44

369

370 EN: Opinion 45: About ICT standardisation

371 http://www.jukkarannila.fi/lausunnot.html#nro_45

372

373 EN: Opinion 46: Review of the EU copyright rules

374 http://www.jukkarannila.fi/lausunnot.html#nro_46

375

376 EN: Opinion 51: European Area of Skills and Qualifications

377 http://www.jukkarannila.fi/lausunnot.html#nro_51

378

379 EN: Opinion 52: Trusted Cloud Europe Survey

380 http://www.jukkarannila.fi/lausunnot.html#nro_52

381

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390 [Continues on the next page]

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434 <http://creativecommons.org/licenses/by-nc-nd/4.0/legalcode>

435

436

437



8 Based on the Finnish three-party system there is a phenomenon called extreme-centre in Finland. The 2011 parliamentary elections in Finland challenge the three-party system, since three "old" parties were not traditionally as the three largest parties. The is now a "new" party as the third largest party. We all must remain being interested about this new development in Finland.