



**CROATIAN ENERGY
REGULATORY AGENCY**

Implementation of REMIT

Workshop on implementation of REMIT in the Energy Community
12 September 2017
Energy Community Secretariat, 1010 Vienna

Agenda

- CEREMP
- Challenges with data reporting
- Stepwise implementation of REMIT
- Information security
- Structural and financial impact
- Regional cooperation
- Recommendations

CEREMP - Current situation

Centralised European Register of Energy Market Participants

CROATIA	NUMBER OF MARKET PARTICIPANTS
NOW REGISTERED - GAS	54
NOW REGISTERED - ELETRICITY	44
NOW REGISTERED – TOTAL	98

HERA has been providing access to CEREMP since February 25, 2015

HERA's web page

<https://www.hera.hr/hr/html/remit.html>

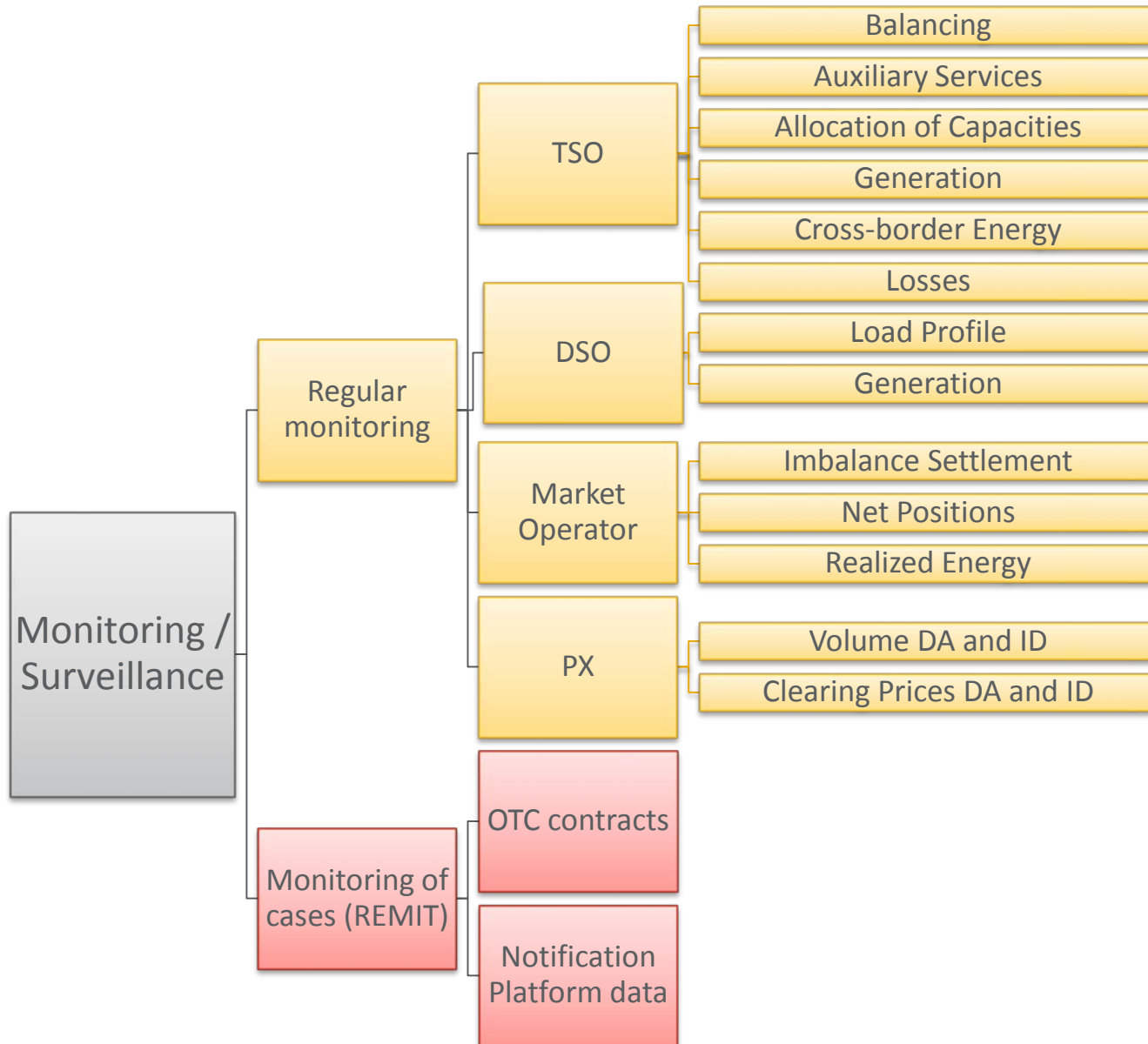
- Dedicated page for CEREMP registration
 - CEREMP Registration User Manual for Market Participants (*CEREMP interface in English*)
 - Korisnički priručnik za registriranje sudionika na tržištu u CEREMP (*CEREMP interface in Croatian*)
- Dedicated page with link to Notification Platform
- HERA newsletter – updated info, mainly from REMIT portal

The screenshot shows the website of the Hrvatska Energetska Regulatorna Agencija (HERA). The header includes the agency's name and logo, along with navigation links for 'O nama', 'Kontakti', and a search icon. A main navigation bar contains links for 'Propisi', 'Dokumenti', 'Javnost rada', 'Registri', 'Regulirane cijene', 'Infrastruktura', 'Česta pitanja', 'REMIT', 'CACM', 'Nabava', and 'Oglasi'. The 'REMIT' link is highlighted, and a dropdown menu is visible with options for 'Novosti' and 'Registracija'. The main content area is titled 'REMIT' and features a paragraph about the 'Uredba Europske unije br. 1227/2011' (Regulation on wholesale energy market integrity and transparency). Below this, there is a section for 'Prijave sumnjivih transakcija, iznimki i odgoda'. To the right, there are two promotional boxes: one for a 'Tarifni kalkulator za električnu energiju za kućanstva' and another for 'iPLIN' (INFORMATOR za kupce PLINA iz kategorije KUĆANSTVO). At the bottom, there are links for 'Najčešća pitanja i odgovori o REMIT-u' and 'Novosti o REMIT-u', and a section for 'Korisni linkovi:'.

Lessons learned from registration process

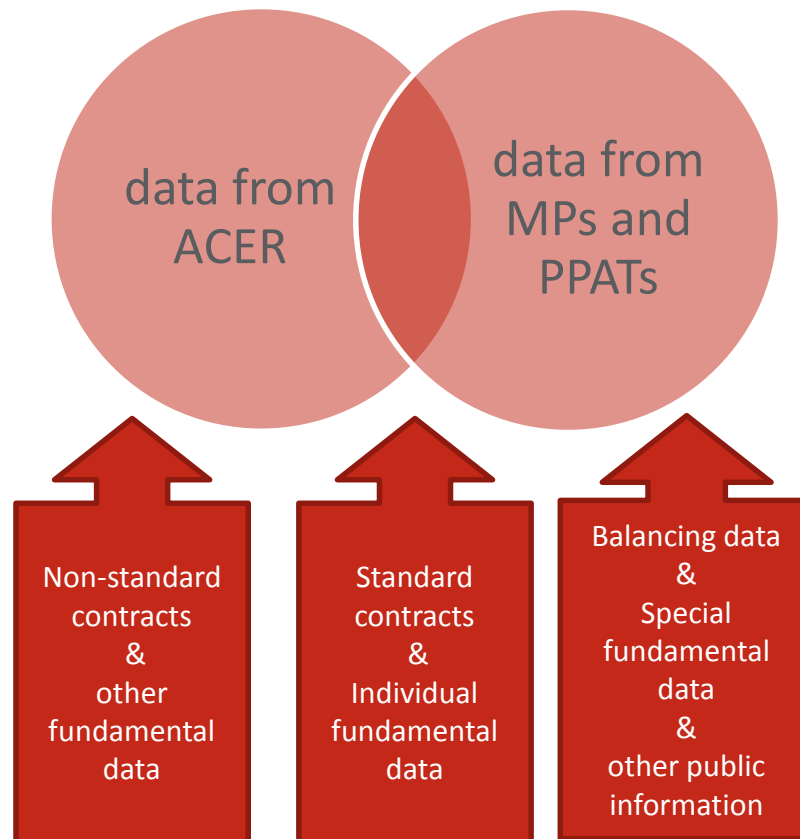
Recommendation	Benefit
As much as possible reduce bureaucratic process of registration of MPs and updating their data in CEREMP	Speed up process by avoiding hard copies of documents, if possible
Informing MPs in timely manner	Organizing workshops and sharing information will decrease overall work overload for regulator
Using of ACER CEREMP environment	Software is free-of-charge and is directly connected to ARIS (no need for investing in new software)
Informing MPs about ACER non-binding documents for registration in CEREMP	Documents available at REMIT portal (Guidance, Q&A Editions, Quarterly Reports)
Participation in ACER REMIT WG & TFs	Exchange of best practices with ACER and between NRAs
Group specific e-mail addresses (registration or questions)	Speed-up in-house processes related to registering documents

Electricity Sector data

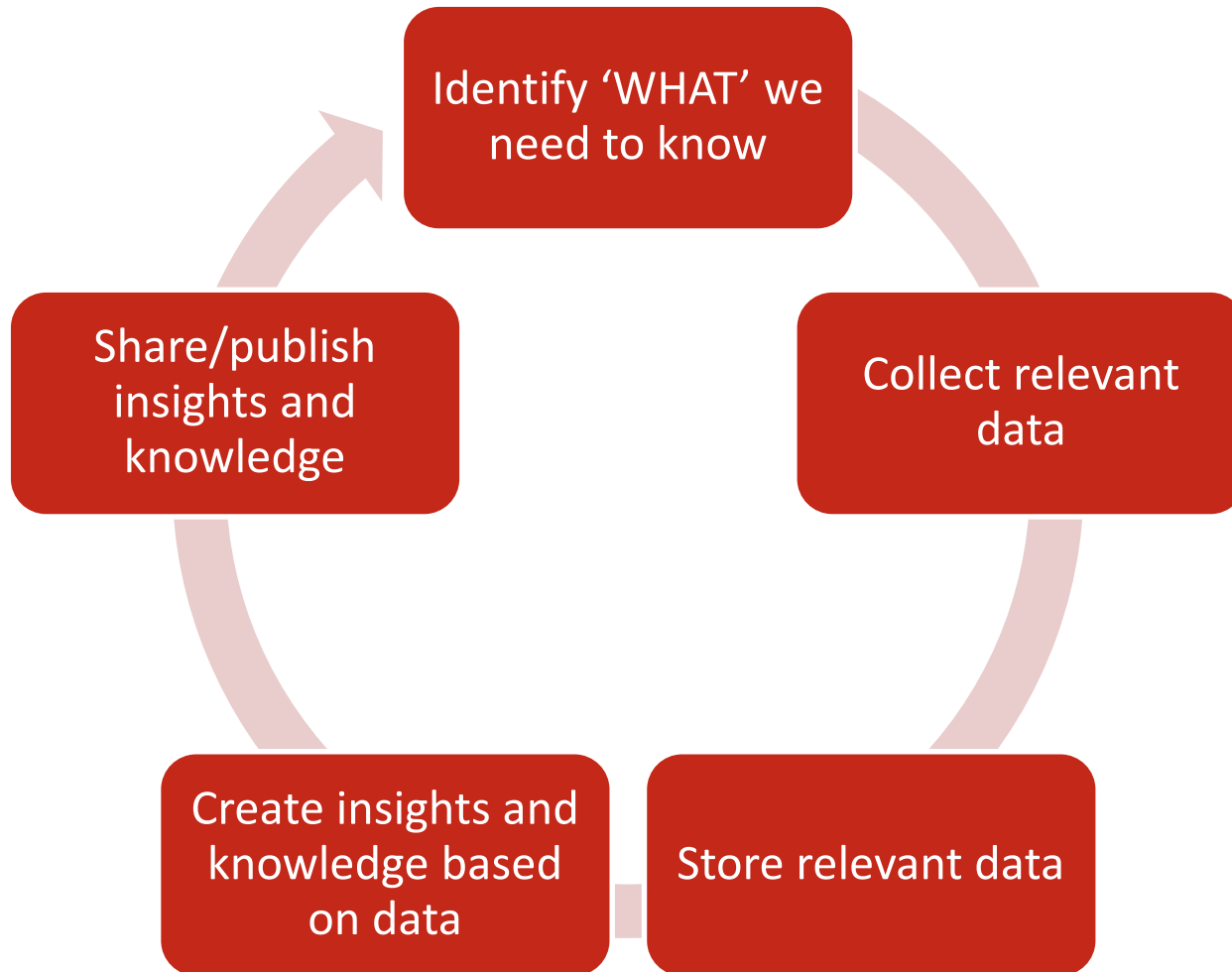


Data reporting to NRA

NRAs will always get part of relevant data directly from MPs and OMPs



Process for collecting relevant data



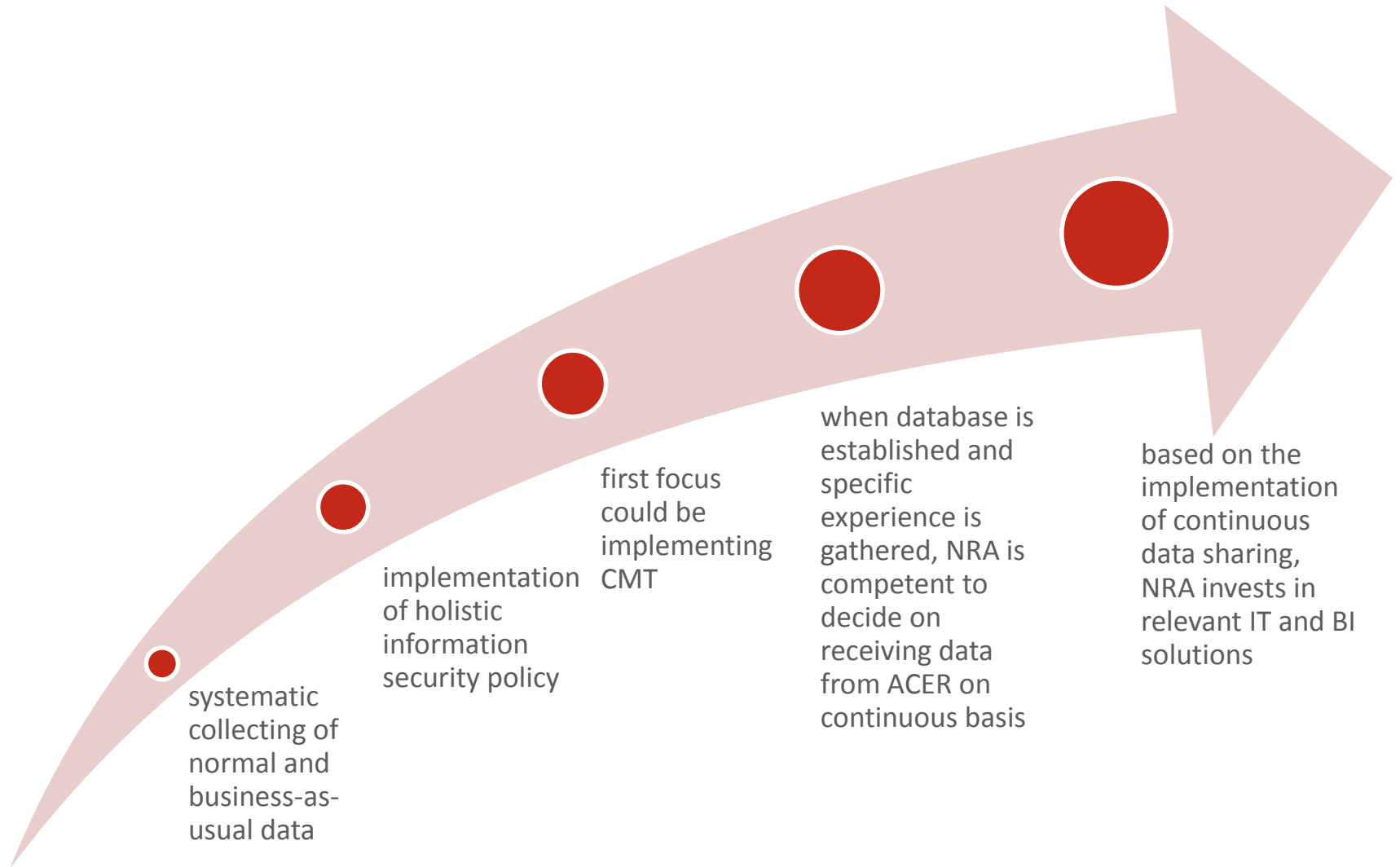
Challenges with data processing

- Systematic data storage and analysing
- Dependence on individual arrangements and availability of employees
- Too many effort on correcting received data
- Systematic monitoring of wholesale markets data

HERA's activities regarding Information Security

- CEREMP
 - VPN connection HERA<->ACER established
 - User certificates for NRA-admins and NRA-users obtained
- CMT (Case Management Tool)
 - A design plan for simple REMIT segregated network
 - IS Policy created in order to comply with REMIT IS Policy's requirements relevant for CMT
- Information Security Policy for REMIT
 - Created by information security consultants
 - Information security management is derived from information asset management and its associated risks
 - Measures & controls that ensure appropriate risk management defined
 - Roles and responsibilities of information security management defined

Stepwise implementation



Structural change in NRA organization

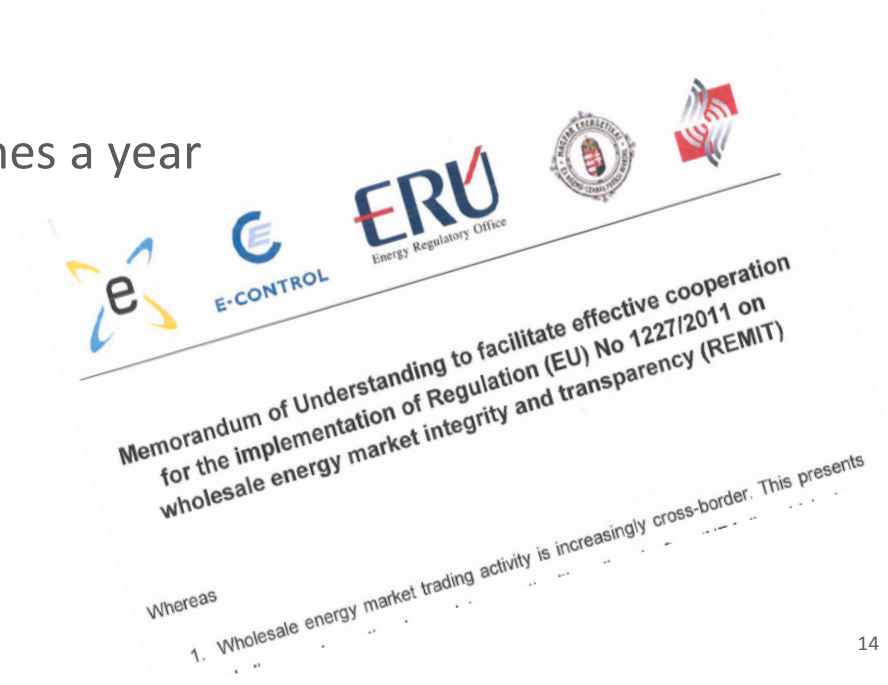
- At the moment no additional staff in HERA for REMIT issues
- Currently, work organized via dedicated REMIT group (staff from electricity department, gas department, legal department and ICT department dealing with REMIT issues)
- Change of internal NRA acts is necessary due to obligation of dedicated employees in REMIT tasks and Information Security Policy issues
- Learning from best practices of other regulators, HERA considers:
 - It is useful to have specific REMIT department which is directly responsible to highest management level
 - Regulator should have at least 3 full-time employees dealing with REMIT
 - REMIT staff should compose of economists, engineers, lawyers and IT experts

Financial impact

- Currently HERA does not have significant financial impact from REMIT tasks
- HERA is in the process of hiring or outsourcing Information Security Officer which is prerequisite for CMT and future data sharing
- In future the most of the financial burden will be correlated with IT adaptation of the current system and number of eventual new employees dedicated to REMIT issues (data administrator, market experts)

Regional cooperation

- In April 2017, last NRA signed Regional REMIT MoU (Austria, Croatia, Czech Republic, Hungary, Slovenia)
- Currently the biggest benefit is capacity building (exchange of experience)
- Future potential cooperation in: sharing of information, market monitoring and case handling
- Frequency of meeting: at least 2 times a year



Recommendations

1. Process of registration MPs in CEREMP should be as much as possible less bureaucratic
2. Timely informing MPs about all their obligations
3. Usage of up-to-date ACER REMIT non-binding guidances for registration and binding procedures for data reporting
4. Stepwise implementation of REMIT obligations
5. Collaboration with ACER and other NRAs
6. Timely assessment of REMIT tasks regarding internal organizational and IT changes



Thank you for your attention

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