

Energie-Control Austria
Rudolfplatz 13a
A-1010 Wien
Austria

Malacky, October 31, 2014

Subject: Comment to the draft of the Energiegroßhandelsdatenverordnung

Dear Madam/Sir,

POZAGAS would like to thank to Energie-Control Austria ("E-Control") for the possibility to comment the draft of the Energiegroßhandelsdatenverordnung ("Draft").

Our comment is as follows:

Proposed § 3 (1) of the Draft shall be added by following sentence:

"This obligation shall not apply to market participants registered by and reporting to national regulatory authority in other member state."

Justification of our proposal:

- i. Compliance with fundamental ideas of REMIT Regulation - to avoid double reporting and not creating unreasonable administrative burden.
- ii. Market participant in accordance with REMIT Regulation shall be registered only by one national regulatory authority and shall report the relevant transactions only to this national regulatory authority.
- iii. Access to the reported information for purposes stipulated by REMIT Regulation is secured for ACER and national regulatory authorities by the REMIT Regulation itself.

We remain at your disposition to discuss those comments and proposals,

Best regards,

Ondrej Stacho
Manager for legal services