

Information about the use of the Publication Website operated by HUPX Zrt. in the case of outages related to electricity production

I. Introduction

1. Pursuant to [REMITⁱ](#), as of December 28, 2011 (the effective date of the regulation), the market participants are subject to obligation to publish inside information. In the past five years, many changes have been implemented in practice, the establishment of [an inside information publication website](#) is remarkable amongst which in Hungary, which is operated by HUPX Zrt. since January 1, 2014, this way allowing the publication of inside information on a central platform, advancing transparency.

2. Another important change is that ACERⁱⁱ collects inside information published on inside information platform as of January 1, 2017 pursuant to Article 10 of the Implementing Regulation of [REMITⁱⁱⁱ](#) using the web feeds provided by the service providers for such purpose.

3. Regarding the publication of inside information, the Hungarian Energy and Public Utility Regulatory Authority (hereinafter: Authority, HEA) supports compliance with the guidance of ACER^{iv} in the course of publication. The guidance is accessible publicly at the [REMIT portal of ACER](#).

4. The purpose of this information is to provide assistance with publication in the case of outages in electricity production. Publication related to outage includes all publications pertaining to inside information regarding the capacity and use of facilities serving for the production, storage, consumption or transmission of electricity, including the planned or unplanned unavailability of such facilities. This means that publication is not only necessary in the case of technical issues, but in all cases when availability cannot be ensured for the particular facility for any reason.

II. The use of the inside information website

5. Pursuant to Paragraph (1) of Section 114/D of Act LXXXVI of 2007, the market participant registered by the Authority based on Paragraph (1) of Section 9 of REMIT will fulfil its obligation regarding the publication of inside information specified in Paragraph (1) of Section 4 of REMIT by uploading the same to the inside information website operated by HUPX Zrt.

6. In order to unify the format of publication, the [Manual of Procedures \(MoP\) on Data Reporting^v](#) issued by ACER based on the Implementing Regulation of REMIT (hereinafter: MoP) contains a list on the exact data content required for publication, separately for outages regarding the electricity market and the natural gas market (Figure No. 1), and a third list regarding the publication of other, not-outage type inside information.

Figure No. 1 - Data content of publication for outages regarding the electricity market

Publication regarding outage
1. Message ID
2. Event status
3. Type of Unavailability
4. Type of Event
5. Publication date/time
6. Event Start
7. Event Stop
8. Unit of Measurement
9. Unavailable Capacity
10. Available Capacity
11. Installed Capacity
12. Reason of the Unavailability
13. Remarks, additional information
14. Fuel type
15. Bidding zone
16. Affected Asset or Unit
17. Affected Asset or Unit EIC Code
18. Market participant
19. Market participant Code

7. In order to enable all market participants to assess overall demand and supply situation and identify the reasons for fluctuation in the wholesale price, equal access to information on the physical status and efficiency of the system is necessary. Therefore, the primary reason for the publication of inside information in accordance with REMIT is that the market participant possessing the inside information shall make other market participants to be in the same situation, this way fulfilling the conditions of fair competition. When questions emerge in the course of publication, the market participants are required to establish the practice of publication in line with such principles.

8. The MoP specifies in detail regarding all fields how one is required to act in the course of populating the particular fields. The problematic issues will be discussed based on the inside information website in the followings. A newsfeed is displayed on the homepage of the inside information website (Figure No. 2) with an excerpt of the publications of market participants, where the publication itself will be displayed by clicking on "More". (Figure No. 3).

Figure No. 2 – Newsfeed of the inside information website

The screenshot displays a newsfeed with three entries, each containing event details, company information, and event specifics.

- Entry 1: Capacity change**
 - Date: 2018. ÁPRILIS 22. 05:18
 - Event Type: Termelés kiesése
 - Company: Mátrai Erőmű Zártkörűen Működő Részvénytársaság (A0000091L.HU)
 - Event Start: 2018.04.22. 05:00
 - Event Stop: 2018.04.22. 09:00
 - Asset: II. blokk
 - Capacity: 22 MW
 - Reason: Kazánüzemi üzemzavar
 - Uncertainty: +/- 2 óra
- Entry 2: Fire protection maintenance**
 - Date: 2018. ÁPRILIS 21. 21:07
 - Event Type: Termelés kiesése
 - Company: MVM GTER Gázturbinás Erőmű Zártkörűen Működő Részvénytársaság (A00001410.HU)
 - Event Start: 2018.04.21. 00:00
 - Event Stop: 2018.04.21. 20:40
 - Asset: Lőrinci GT Erőmű
 - Capacity: 170 MW
 - Reason: Tűzvédelmi karbantartás
- Entry 3: ST Vacuum system failure of Kispest PP**
 - Date: 2018. ÁPRILIS 21. 00:58
 - Event Type: Termelés kiesése
 - Company: Budapesti Erőmű Zrt (A0012165A.HU)
 - Event Start: 2018.04.20. 19:02
 - Event Stop: 2018.04.21. 00:50
 - Asset: Kispesti Erőmű
 - Capacity: 48.3 MW
 - Reason: Gőzturbina vákuum rendszer meghibásodás.

Figure No. 3 – The display of publication in a pop-up window

The pop-up window shows the following details for a publication:

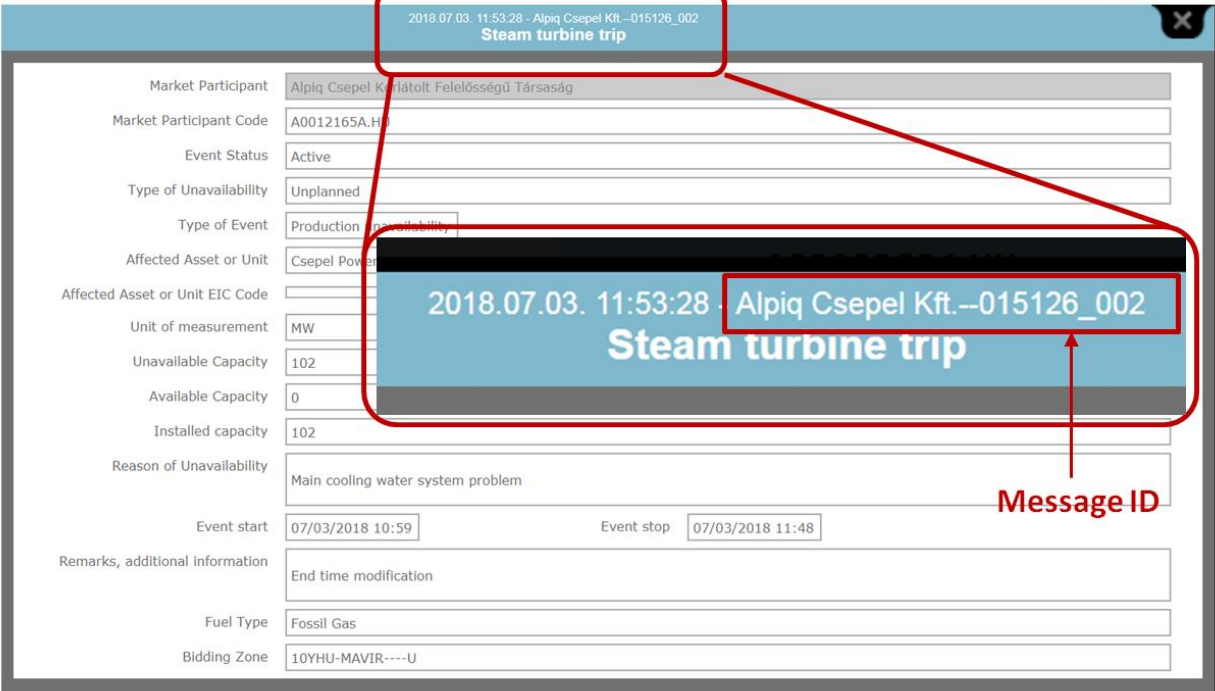
- Header:** 2018.07.03. 11:53:28 - Alpiq Csepel Kft.-015126_002, Steam turbine trip
- Market Participant:** Alpiq Csepel Korlátolt Felelősségű Társaság
- Market Participant Code:** A0012165A.HU
- Event Status:** Active
- Type of Unavailability:** Unplanned
- Type of Event:** Production unavailability
- Affected Asset or Unit:** Csepel Power Plant steam turbine
- Affected Asset or Unit EIC Code:** (Empty)
- Unit of measurement:** MW
- Unavailable Capacity:** 102
- Available Capacity:** 0
- Installed capacity:** 102
- Reason of Unavailability:** Main cooling water system problem
- Event start:** 07/03/2018 10:59
- Event stop:** 07/03/2018 11:48
- Remarks, additional information:** End time modification
- Fuel Type:** Fossil Gas
- Bidding Zone:** 10YHU-MAVIR----U

1. Publication ID

9. The publication ID is specified on the header of the publication on the inside information website. The ID consists of two parts: the serial number and the version number of publication. The version number means that if the publication is related to a previous publication or it is the update of the same, this circumstance must be indicated. This way, the system supplies the ID with a sequential number, thus enhancing the traceability of the history of the publication. As may be seen on Figure No. 4, there is a three-digit number (006), which stands for the version number of publication. The first publication is indicated

with the number “001”, the first update with number “002”, and so on. Therefore, the number “006” means that the particular publication is the fifth update.

Figure No. 4 – header of publication



2. Event status

10. Based on the MoP, the event status field has three accepted values that may be provided on the inside information website: active, dismissed and inactive. The purpose of the field is to provide information on the relevance of the particular event from a market point of view.

11. According to default setting, the event status is active, which means that the event is occurring or will occur in the future.

12. In the case of dismissed status, the event subject to publication was cancelled, withdrawn or updated. If the event has been cancelled or withdrawn, the event status field must be set to dismissed, in order to clarify for the market that the event will not take place. If an update was made in the details of the event, the status is not required to be modified, but the previous publication must be attached to the later one as history.

13. Inactive status event may be used for publications where the event has already taken place, but the use is not mandatory. If the event has already taken place, the active status may be kept at the particular publication, as in this case, it can be seen that the event has already taken place and, therefore, it is not relevant in the market any longer.

3. Publication date/time

14. In the case of the particular publications, the date of publication is also of utmost importance. The inside information website displays the date of publication automatically, there is no need to indicate it separately. Therefore, the market participant only has to decide when to upload the particular publication.

15. As Article 4 of REMIT does not specify an exact deadline, it is the market participant's responsibility to decide when to publish the inside information in order to comply with the "timely" requirement.

16. The most important element of choosing the date of publication is that until the inside information has not been published, therefore, the information is still qualified as inside information, the regulations pertaining to the prohibition of insider trading are applicable to the information (Article 3 of REMIT).

17. Based on the guidance of ACER pertaining to REMIT, unless otherwise regulated, the publication must take place within the shortest time possible, but within one hour at latest, except for the case when the exceptions specified in Paragraph (4) of Section 3 or Paragraph (2) of Section 4 of REMIT are applicable. In such cases, both the Authority and ACER shall be informed about the application of the exception.

18. If the information will be displayed in places besides the inside information website, the data content in the different places must be consistent.

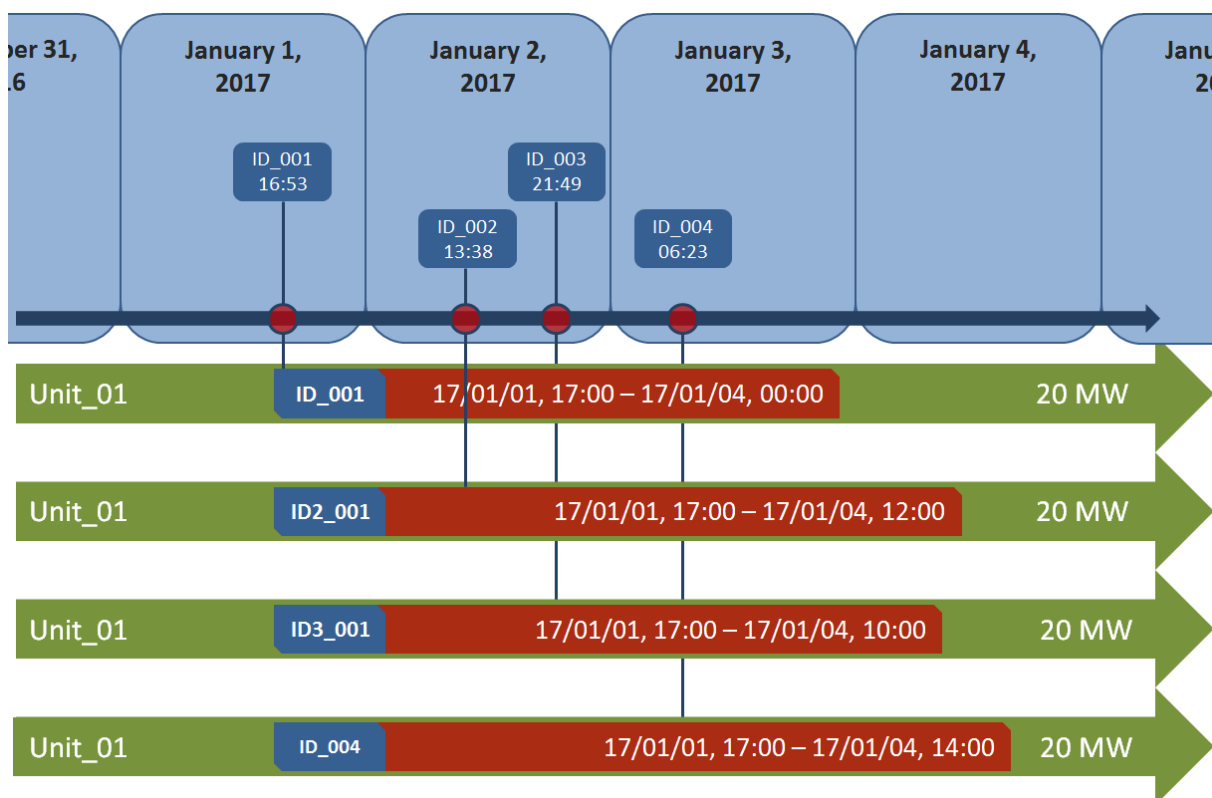
4. Event start and stop

19. By the time the market participant chose the date of publication, it must have had decided what information to provide pertaining to the duration of unavailability. Generally, the start and stop date of the event are required to be specified by minute. Exceptions may only be made in cases when due to the uncertainty of the event, such exact specification is not possible. In such cases, the date must be rounded up to the nearest hour.

20. It is of utmost importance that in cases where uncertainty decreases by time or is changed in the meantime, either in the case of the start (if the event has not taken place yet) or the stop date, the market participant must update the previous publication. In such case, the particular publications must be connected to each other in accordance with the provisions of the section on publication ID. If either the start or the stop date changes compared to the originally planned date with a period exceeding an hour, such circumstance must be displayed by the market participant in an updated publication. The cases when the changes related to the particular events are "updated" in the "Remarks, additional information" field of a previous publication do not qualify as proper publication.

21. As may be seen on Figure No. 5, during the unplanned unavailability of a particular unit, the first publication of the event contains a start and stop date. As the stop date is changed on several occasions, the market participant subject to publication obligation is required to update the previous publication (ID_001, ID_002, etc.), where, as it is the same event, the same start date must be indicated (Figure No. 5), the change only affects the stop date. This way, the market participants can connect the different publications to one event.

Figure No. 5 – **Proper** publication of an event with a changing stop date



22. Therefore, publications where the market participant subject to publication obligation uploads the same unavailability upon the repeated publication due to the changed stop date with the start date of the particular publication, with a new publication ID, do not qualify as proper publications, as, in this case, the market participants may be misled by the new publication. If the start date is modified, then, for the easy identification of the event, it must be connected to the previous publication. In this case, the start date will change in the publication. If the stop date is also modified later on, the market participant must act in accordance with the aforementioned.

23. As the stop date of the event, the date of ramp-up should be specified. Detailed information on ramp-up is specified in Subsection II. 7.

24. If no ramp-up is connected to the available capacity, but the producer's capacity is available for the market, such information must be published properly. This means that in such cases the date when the entire capacity is available once again must be specified as the stop date of the event.

5. Unavailable capacity, available capacity

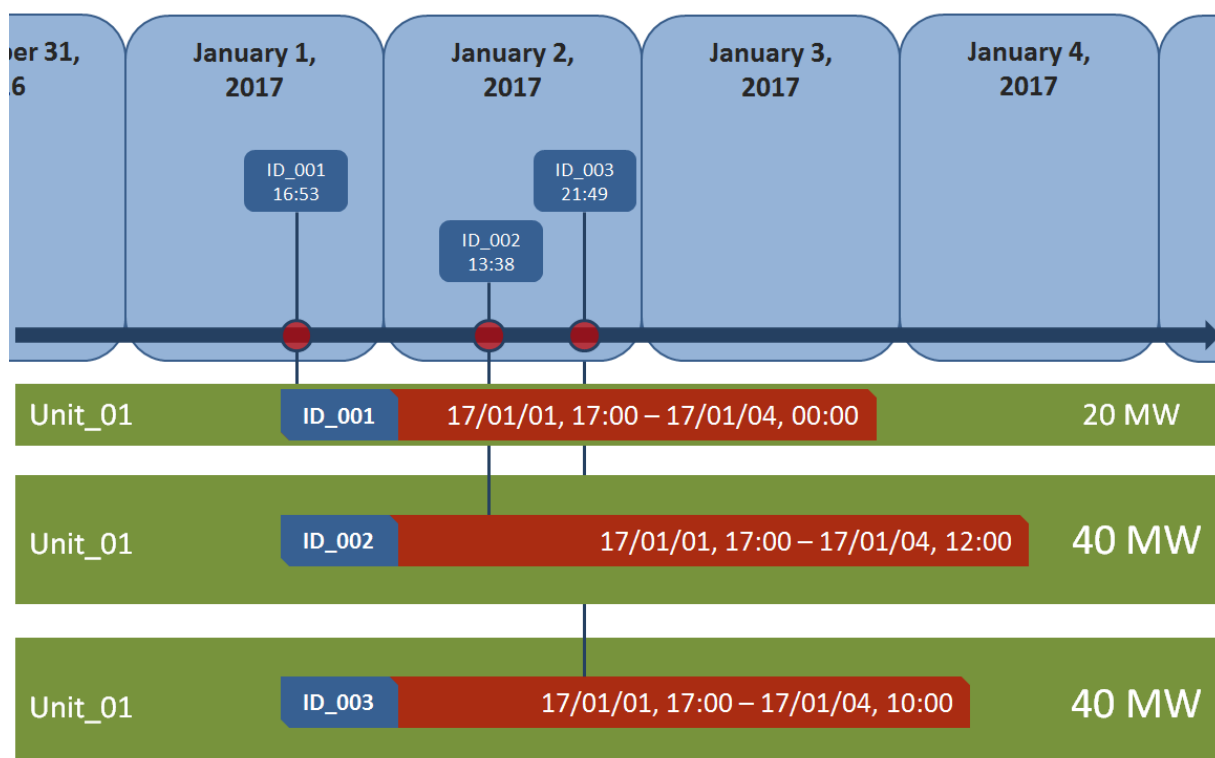
25. The extent of capacity change too is of significant importance in terms of publication, besides the duration of the event. In such cases also, the market participant is required to determine the volume of unavailable capacity to its best knowledge, based on which the volume of available capacity may also be specified. As the three concepts are closely related, the values displayed here must be consistent with each other. In the course of publication, we recommend complying with [the information of the Hungarian Energy and](#)

Public Utility Regulatory Authority about the lower limit of the obligation of publication of capacity outages relating to electricity production and consumption.

26. As for capacities, three data must be provided, and MW is the unit of measurement in each case, as set forth by the MoP. The unavailable capacity means the amount of generation feed-in to the grid through the settlement point that is unavailable for the market due to the event (net generation), while available capacity means the capacity that is not affected by the event (net generation). Installed capacity means the output per unit that the power plant unit can perform on a continuous basis in compliance with the applicable security regulations amongst normal operating circumstances (gross generation).

27. Similarly to the publication of changes in the duration of the event, the change of the volume of unavailable capacity is also required to be published. If the same event is in question, the modified value must be provided in accordance with the regulations pertaining to updates, with the same Publication ID and with the subsequent version number. As the data content provided by ACER does not track the changes dynamically, in such cases, the date specified in the original publication must be specified as the event start date in the update and the volume of unavailable capacity has to be modified. If, at the same time, the event stop date is also modified, such value must also be modified (Figure No. 6).

Figure No. 6 – **Proper** publication of the modification of unavailable capacity with a modified stop date



6. The practice of updating publications

28. If the duration of the previously published information changes, the market participant is required to decide whether the publication of the information would influence the other market participants in their decisions whether entering into transaction and is required to act

accordingly (whether or not to publish the information), taking into consideration the prohibition of insider trading set forth in Article 3 of REMIT.

29. Thus, the market participant may decide not to publish the information immediately, only at a later date if in the case of a particular unavailability the fact that the stop date will be modified is revealed two days prior, possibly to see whether there will be further changes regarding the event. In this case, such information qualifies as inside information, and, therefore, shall not be used by the market participant and shall not be disclosed to third parties and the market participant shall not recommend or induce another person to trade based on this information.

7. Display of loading and backloading in the publication

30. If, due to the type of the power plant, ramp-up or ramp-down takes more time, when the available capacity is changing on a continuous basis, the market participant is required to indicate the capacity reached at the end of the ramping period as follows.

31. In the case of ramp-up, the market participant should indicate the end of the ramp-up period as the stop date of the event regarding the outage, and should display the period during which the ramp-up takes place in the “Remarks, additional information” field.

32. In the event of ramp-down, the market participant should indicate the start of reducing the load as the start date of the event regarding the outage and should display the period during which ramp-down takes place in the “Remarks, additional information” field. In this case, the entire quantity that will not be available at the end of ramp-down must be indicated as unavailable capacity.

33. If the schedule changes compared to the originally planned with more than one hour, the market participant shall publish this in an updated publication.

34. If the exact order or schedule of the ramp-up or ramp-down is available, such information is also required to be provided in the “Remarks, additional information” field. In such cases also, the goal is that the information about the currently available capacity is available for the market. Schedules with an uncertainty level that would rather be misleading should not be published. In such cases, the use of updates is recommended (See Subsection II. 6).

8. Affected asset or unit

35. The smallest individually interpretable production unit is to be specified as the affected asset or unit. If the facility consists of several generation units, publications must be made separately for each affected generation unit (e.g. unit, turbine), it is not sufficient to specify the particular facility as a whole.

9. Remarks, additional information

36. Although the significant information pertaining to outages are not to be specified in the “Remarks, additional information” field, the information published in this field may still contain useful information in relation to the publication, providing additional information to the markets regarding the outage.

37. In the case of original publications, the reason for unavailability or the uncertainty interval related to the unavailability for example may be specified in this field. In the case of updates,

this field should include the reason for the change that took place compared to the previous publication and the field such change affected. This way, for example, if the stop date of the event is changed, the remarks should include: “change in the stop date of the event, for the following reasons”. In the same way, if for example, the type of outage is qualified as planned outage due to time passed in the case of unplanned unavailability (unexpected event) based on the operating rules, this circumstance is required to be indicated as a remark: “due to operating rules, the type of outage was modified from unplanned to planned”.

III. Organisation of internal processes regarding publication

38. Although the REMIT itself does not contain any regulations about the method the market participant should organise its activity regarding the publication of inside information, and about how such activities should be documented, the Authority considers it especially effective to establish business processes that cover the entire process of publication, including an audit trail and ensuring the traceability of necessary information. This ensures proper transparency for the market participant, and also allows the market participant to certify compliance with REMIT in the proceeding carried out by the Authority if necessary.

IV. Summary

Therefore, the market participant acts properly in the course of publication if it publishes the inside information available to it in a manner also traceable for the market (this way unqualifying the particular information as inside information), thus creating the possibility for the other market participants to make decisions on purchasing or selling wholesale energy products having the necessary market information amongst the particular market conditions.

Contact:

Should you have any questions concerning the content of the information, please contact us at remit@mekh.hu.

ⁱ REMIT: Regulation (EU) No. 1227/2011 of the European Parliament and of the Council of 25 October 2011 on wholesale energy market integrity and transparency

ⁱⁱ ACER: Authority for the Cooperation of Energy Regulators

ⁱⁱⁱ REMIT Implementing Regulation: Commission Implementing Regulation (EU) No 1348/2014 of 17 December, 2014 on data reporting implementing Article 8(2) and Article 8(6) of Regulation (EU) No 1227/2011 of the European Parliament and of the Council on wholesale energy market integrity and transparency

^{iv} These include in particular:

1. Guidance on the application of Regulation (EU) No 1227/2011 of the European Parliament and of the Council of 25 October 2011 on wholesale energy market integrity and transparency - 4th Edition, last update: March 22, 2018;
2. Questions & Answers on REMIT;
3. Manual of Procedures on transaction data, fundamental data and inside information reporting;
4. FAQs on REMIT Fundamental Data and Inside Information

^v MoP: Manual of Procedures on transaction data, fundamental data and inside information reporting (MoP on data reporting)