

Baltic-Finnish Fees Structure

KAROLIS BAGDONAS

Senior Key Account Manager

HENRIK SØRENSEN

Senior Business Developer

Vilnius, 17/07/2024

Agenda

1. Welcome
2. Recap on previous webinars
3. Trading and clearing fees after product migration to EEX and ECC
4. Regulatory environment (REMIT, MiFID, EMIR)

Your presenters



Karolis Bagdonas

Senior Key Account Manager
GET Baltic



Henrik Sørensen

Senior Business Developer
EEX

Topics in the previous webinars

- Development the Baltic-Finnish gas markets of the future
- NCM model [NCM Member \(ecc.de\)](#)
- DCP model [DCP Members \(ecc.de\)](#)
- Admission process
- Deep-dive into trading, financial settlement and invoicing, trading limits, and collateral requirements ([Recordings on our website](#))

Baltic-Finnish fees structure post integration

New lower variable cost making it more attractive than ever to trade on-exchange

- Harmonization of fee structure while keeping overall price level stable
- New state-of-the-art trading system
- Physical settlement and clearing through ECC, a large and regulated CCP
- Daily financial settlement, instead of weekly
- Simplified access to the most liquid markets of Europe
- Spread trading to Europe's local and regional hubs



New and modern trading infrastructure



New long-term products (futures) and indices



New clearing house services



New trading opportunities

Attractive fees for trading Baltic-Finnish markets with EEX and ECC

| | |
|---|-----------------|
| EEX Spot trading fee for Baltic-Finnish Natural Gas Markets | 0.050 €/MWh |
| EEX Baltic-Finnish Natural Gas Markets (first 12 months for 0,00€) | 5,000.00 € p.a. |
| EEX Technical access - Shift Trader, from April 2025 | 990.00 € p.a. |
| EEX ACER REMIT reporting service fee | 3,420.00 € p.a. |
| ECC Spot clearing fee | 0.01 €/MWh |
| ECC DCP Baltic-Finnish Markets only, EUR p.a. (the year 2025 for 0,00€) | 3,500.00 € p.a. |
| <i>or ECC NCM participation fee, EUR p.a. (offset against clearing fee)</i> | 1,000.00 € p.a. |

- Spot trading and clearing fee at just 0,06 €/MWh
- One membership fee for all three markets: Finland, Latvia-Estonia, Lithuania
- Direct Clearing Participant fee for Baltic-Finnish markets at just 3,500€ p.a.

Introducing new trading opportunities to the markets and providing additional security for you

- Lower variable costs for trading Baltic-Finish markets
- Stable and secure state-of-the-art trading infrastructure
- Opening of the Baltic-Finnish market to a network of international market players
- Opening of EEX's pan-European markets to the Baltic-Finnish market players
- Spread trading against other hubs with guaranteed execution in the same trading system
- Launch and development of local derivatives markets linked to EEX's other markets
- Clearing through large central counterparty under strict EU CCP standards
- Daily financial settlement instead of weekly



Exchange fees:

Opportunities for trading new markets and futures

| Trade | Price |
|---|------------------|
| EEX spot trading fee | 0,05 €/MWh |
| EEX Futures trading fee | 0,01 €/MWh |
| EEX Baltic-Finnish Natural Gas Markets* | 5.000,00 € p.a. |
| EEX Membership fee, gas, power, environmental markets | 37.000,00 € p.a. |
| EEX Membership fee, all natural gas markets | 20.000,00 € p.a. |
| EEX Technical access per account, from April 2025 | 2.400,00 € p.a. |
| EEX Technical access - Shift Trader, from April 2025 | 990,00 € p.a. |
| EEX ACER REMIT reporting service fee | 3.420,00 € p.a. |

*Considering all three Baltic-Finnish markets as one market area for membership fee

Clearinghouse fees: Opportunities for trading new markets and futures

| Trade | Price |
|---|---|
| ECC Spot clearing fee | 0,01 €/MWh |
| ECC Futures clearing fee | 0,0025 €/MWh |
| ECC Futures delivery fee at expiry | 0,01 €/MWh |
| ECC NCM participation fee | 1.000,00 € p.a. |
| ECC DCP Baltic-Finnish Natural Gas Markets only** | 3.500,00 € p.a. |
| ECC DCP several spot markets | (currently under review) 12.500,00 € p.a. |

**DCP emerging markets will be free for the calendar year 2025

Questions and Answers

GET Baltic Webinar #3 - Connectivity, Regulations & Fees

EMIR, REMIT, MiFIDII/ MiFIR Reporting

Ulrike Preißner

Regulatory Reporting Obligations

| | | <u>EMIR</u> | <u>REMIT</u> | <u>MiFID II/MiFIR</u> |
|---------------------------------|---------------------|----------------|--------------|-----------------------|
| REPORTABLE DATA | Orders | - | ✓ | _1 |
| | Trades | ✓ | ✓ | ✓ |
| | Positions | ✓ | - | ✓ |
| | Exposures | ✓ | - | - |
| COMMODITIES & MAKETS | Reference Data | - | - | ✓ ² |
| | Spot | - | ✓ | _3 |
| | Derivatives | ✓ ⁴ | ✓ | ✓ ⁴ |
| | Power & Natural Gas | ✓ | ✓ | ✓ |
| | Other commodities | ✓ | - | ✓ |

¹ Record-keeping and pre-trade transparency required.

³ Emission allowances to be reported as exemption

² Under MAR and MIFIR.

⁴ For regulated market and financial products on OTF.

REMIT Article 8

- Regulation (EU) No 1227/2011, Wholesale Energy Market Integrity and Transparency (REMIT) Article 8 in connection with the REMIT Implementing Regulation (EU) No 1348/2014
- REMIT II included amendments of reporting obligation applicable as of May 2024

Who needs to report?

- Organised Market Places (OMPs): make available the data relating to order book and thereby fulfilling on behalf of MPs their obligation
- Market Participants (MP): persons, incl. transmission system operators, who enter into transactions, including the placing of orders to trade, in wholesale energy markets

What must be reported?

- A record of wholesale energy market transactions including order to trade
- Details of wholesale energy products executed at Organised Market Places including matched and unmatched orders

Where to report to?

- Registered Reporting Mechanisms (RRMs) report directly to ACER
- RRMs must comply with the technical and organizational requirements defined in the RRM Requirements

When to report?

- Details of standard contracts shall be reported as soon as possible but no later than on the working day following the conclusion of the contract or placement of the order

Can someone else report?

Reporting obligation is fulfilled if OMP reports on behalf of MP

Delegation of **REMIT** Reporting

- EEX is Registered Reporting Mechanism (RRM) for the automated reporting of EEX trading data
- Please note that MPs are obliged to register with the National Regulatory Authority (NRA) – [List of NRAs](#)
- MPs that engage in algorithmic trading and/or provide direct electronic access to an OMP shall notify the NRA and ACER

Basic Service¹

- Data provision to the market participant (ACER XML files)
- Reporting to ACER
- Provision of ACER response files

Additional Services¹

- Reporting to EICOM, the Swiss Federal Electricity Commission
- Data provision to Equias

Since 7 May 2024, the use of the Basic Service is mandatory for all trading participants admitted to EEX

Who is responsible?

Overall responsibility rests with the Market Participant

What products are to be reported?

- Power (Derivatives) and Gas (Derivatives and Spot) with Delivery in the EU
- Listed on EEX Regulated Markets and OTFs

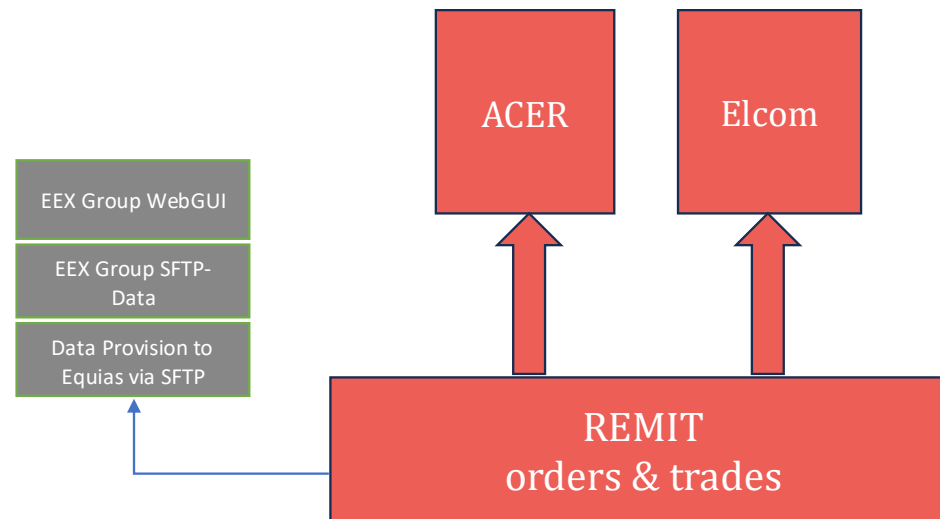
What data records are included?

- Orders (matched and unmatched)
- Trades (Orderbook, Trade Registration, Give Ups and Take Ups)

¹ Service applicable as of 1 August 2024

REMIT Data Services

- Automated submission with minimal effort
- Direct access to submitted messages and acknowledgement files via SFTP
- Online monitoring and data export via the EEX Group WebGUI
- Optional data transfer to Swiss EICoM for market participants based in Switzerland
- Automatic updates of our regulatory reporting solution upon latest regulatory requirements, inclusion of new products offered for trading and changes in data provision
- Reporting reliably at all times – even on public holidays (T2 calendar applies)
- Support by regulatory reporting experts



Fees **REMIT** Data Services¹

| | Basic Service | Additional Service | |
|--|---|-------------------------------|--------------------------|
| | Reporting to ACER and data provision to the trading participant | Reporting to EICom | Data Provision to Equias |
| Power Derivatives³⁾ | € 285 per month | € 100 per month | € 50 per month |
| Gas Derivatives & Spot³⁾ | € 285 per month | € 100 per month ⁴⁾ | € 50 per month |

- 1) Since 7 May 2024, the use of the Basic Service has been mandatory for all trading participants admitted to EEX. The corresponding fee therefore has to be paid by all trading participants. Its scope depends on the products traded by the trading participants (Power Derivatives and/or Gas Derivatives & Spot). This applies irrespective of the existence or scope of a contract on the corresponding service between the trading participant and EEX AG.
- 2) Upon request, the data can also be forwarded to EICom in accordance with the StromVV.
- 3) EEX regulated market and/or EEX OTF.
- 4) The provision of Data related to the market segment EEX Gas will be covered once a reporting obligation for this market segment enters into force and the necessary technical requirements are implemented.

- More Information via: [REMIT Transaction Reporting \(eex.com\)](https://www.eex.com/remit-transaction-reporting)
- During the admission process you will receive the respective form
- After receiving the completed forms, the [Reporting Services team](#) starts the setup process, which involves several steps to ensure that you have secure access to your reported data
- You will be guided through the process by the [Reporting Services team](#)

¹ Service applicable as of 1 August 2024

ACER Fee

- EEX AG invoices all fees and charges levied by ACER against EEX AG which are specifically attributable to the REMIT notifications of a trading participant to the respective trading participant in full on an annual basis.
- [Commission Decision \(EU\) 2020/2152](#) on fees due to the European Union Agency for the Cooperation of Energy Regulators for collecting, handling, processing and analysing of information reported under Regulation (EU) No 1227/2011 of the European Parliament and of the Council (“Commission Decision”):

| Transaction records per data cluster | Fee subcomponent in EUR |
|---|-------------------------|
| 1 to 1 000 | 250 |
| 1 001 to 10 000 | 500 |
| 10 001 to 100 000 | 1 000 |
| 100 001 to 1 million | 2 000 |
| More than 1 million to up to 10 million | 4 000 |
| More than 10 million to up to 100 million | 8 000 |
| More than 100 million | 16 000 |

EMIR Article 9

- European Market Infrastructure Regulation (EU) No 648/2012 of the European Parliament and of the Council on OTC derivatives, central counterparties and trade repositories
- EMIR REFIT included comprehensive amendments of reporting scope applicable as of April 2024

Who needs to report?

- Counterparties and CCPs
- Double-sided-reporting and both sides of the reports have to match (ECC – CM and CM – NCM)

What must be reported?

- Details of any derivative contract concluded
- Any modification or termination of the contract
- Duplication shall be avoided

Where to report to?

- Trade repository

When to report?

- No later than the working day following the conclusion, modification or termination of the contract (t+1)

Can someone else report?

Delegated reporting is permitted

Delegation of EMIR Reporting

- Counterparties need to provide Legal Entity Identifier (LEI) with status „Issued“
- Further information regarding the issuance of LEIs via www.leiroc.org

Basic Service

- EMIR data files for individual download
- Provision on the working day following the conclusion of a contract
- Files are usable as input data for reporting to a Trade Repository of own choice

Additional Service

- Transfer of EMIR data files to Regis-TR on behalf of the delegating Counterparty in a complete, accurate and timely manner
- Reported EMIR Data and Regis-TR message responses are provided on FTPS
- WebGUI to monitor and download reported EMIR data and Regis-TR message responses

Harmonized File

- includes matching relevant fields for the EMIR Position reporting
- simplifies the reconciliation and matching process between the CCP and CM

Who is responsible?

• Liability is with the delegating party

What products are to be reported?

- Derivatives cleared through ECC

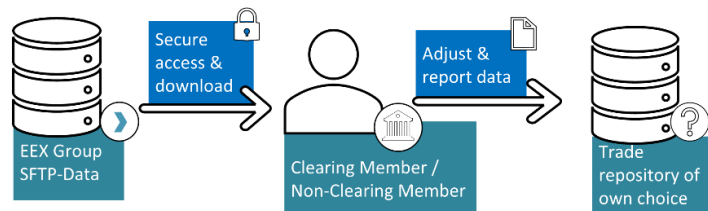
What data records are included?

- Transactions
- Positions
- Exposures (CCP and Clearing Member)

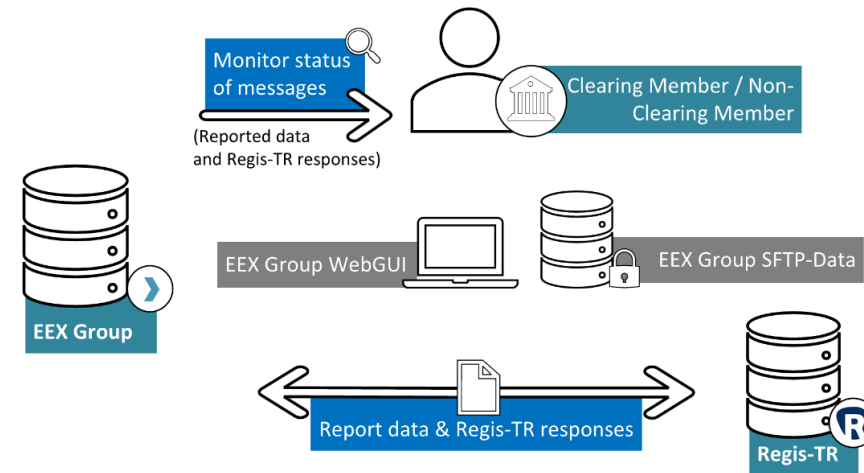
EMIR Data Services

- Automatic updates of our regulatory reporting solution upon latest regulatory requirements, inclusion of new products offered for trading and changes in data provision
- Reporting reliably at all times – even on public holidays (T2 calendar applies)
- Increased data consistency for EEX Group members through standardized processes for EMIR, REMIT and MiFID II / MiFIR reporting
- Easy access via SFTP server and WebGUI
- Choice between basic service and additional service (full delegation service)

EMIR Data Services – Basic Service



EMIR Data Services – Additional Service



Fees EMIR Data Services

| | EMIR Harmonized File | Basic Service | Additional Service |
|--|---|---|--|
| | Provision of EMIR Harmonized File ^{*1} | Data provision to the Market Participant | Reporting to Regis-TR |
| All exchanges ECC provides Clearing Services for | Free of charge | Non-Clearing Members: 300 €/month | Non-Clearing Members: 100 €/month |
| | | Institution Clearing Members: Free of charge | Institution Clearing Members: 400 €/month ^{*2} |

*1 The EMIR Harmonized File will be provided in csv format and will be made available to the Reporting Participant on an FTP server. The Reporting Participant can individually download the file on the business day following the reportable event.

*2 Institution Clearing Members are required to hold an own Regis-TR account.

- More Information via: [Trade Reporting under EMIR Refit \(ecc.de\)](https://ecc.de)
- To use the EMIR Data Services, please fill in the form titled “EMIR Data Services Agreement as of 05_2024” and send it to the [Reporting Services team](#)
- After receiving the completed forms, we will contact you to start the setup process, which involves several steps to ensure that you have secure access to your reported data
- You will be guided through the process by the [Reporting Services team](#)

MiFID II/MiFIR

- Article 58 paragraph 1 point (b) of Directive 2014/65/EU Markets in Financial Instruments Directive (“MiFID II”)
- Article 26 of Regulation 600/2014/EU Markets in Financial Instruments Regulation (“MiFIR”)

Who needs to report?

- Investment firms or trading venues

What must be reported?

- MiFID II: complete breakdown of all positions in commodity derivatives and emission allowances and derivatives thereof
- MiFIR: complete and accurate details of transactions in financial instruments

Where to report to?

- Competent National Authority (here: BaFIN)

When to report?

- No later than the working day following (d+1)

Can someone else report?

Reporting obligation can only be fulfilled via the MIFID II/MiFIR Reporting Agreement

MiFID II/MIFIR Reporting Schemes

MiFIR Transaction Reports for Investment Firms

- Provision of Draft Reports by EEX for individual download from the SFTP server
- Member can use the Drafts to fulfill their own reporting obligation

MiFIR Transaction Reports for Non-Investment Firms OR Third Country Firms

- Data Contribution by Trading Participants
- EEX provides draft reports and members have to verify and amend - if necessary - the reports until 02:00 pm CE(S)T on the business day following the reportable event.
- Provision of files via SFTP server

MiFID II Position Reports

- Data Contribution by Trading Participants
- EEX provides draft reports and members have to verify and amend - if necessary - the reports until 02:00 pm CE(S)T on the business day following the reportable event.
- Provision of files via SFTP server

Who is responsible?

- Reporting obligation lies with the market operator but trading participants are required to support reporting and contribute additional information that is not available to the exchange.

What products are to be reported?

- Commodity derivatives, emission allowances and derivatives thereof (MiFID II)
- Financial instruments (MiFIR)

What data records are included?

- Transactions (on-exchange and trade registration)
- Positions

MiFID II/MIFIR Reporting Workflow

- 1 **EEX AG:** Provision of **MiFID Instrument Files** on the SFTP server earliest at 00:45 a.m. CE(S)T
- 2 **EEX AG:** Provision of **Draft Reports** on the SFTP server between 08:00 and 10:00 a.m. CE(S)T
- 3 **Participant:** Amendment of Draft Reports until 02:00 p.m. CE(S)T
- 4 **Participant:** Upload of a valid **Participant Report** until 02:00 p.m. CE(S)T
- 5 **EEX AG:** Submission of the latest valid **Participant Report** to BaFin after 02:00 p.m. CE(S)T

- MiFID Instrument File contains a list of all instruments that are subject to reporting obligations
- Draft reports are based on EEX and ECC data, member static data and default values provided by the Participant via the Participation Form.
- Short Codes need to be uploaded to the EEX Member Section to provide National IDs or Legal Entity Identifiers (LEIs)
- Participants are supposed to download and review draft position reports and – if necessary – amend and upload new versions using the Reporting Services SFTP interface

Fees **MiFID II/MiFIR** Reporting Agreement

| Instrument Data Provision | |
|--|-----------------|
| For customers that are not members of EEX | € 300 per month |
| MiFIR Transaction Reports | |
| Data Provision for Investment Firms (Scheme 2) | € 300 per month |

- Scheme 1 (MiFID II Position Reports) and Scheme 3 (MiFIR Transaction Reports for Non-Investment Firms or Third Country Firms) are not charged
- More Information via: [MiFID II / MiFIR Reporting \(eex.com\)](https://www.eex.com/mifid-ii-mifir-reporting)
- Detailed description of reporting workflow, set up and required data are included in [MiFID II/MiFIR Reporting Description \(eex.com\)](https://www.eex.com/mifid-ii-mifir-reporting-description)
- During the admission process you will receive the respective form
- After receiving the completed forms, the Reporting Services team starts the setup process, which involves several steps to ensure that you have secure access to your reported data
- You will be guided through the process by the Reporting Services team

Thank you!

> eex group

Contact Reporting Services

 +49 342 2156-380

EMIR/REMIT  reporting-services@eex.com

MiFIDII/ MiFIR  mifid-mifir-reporting@eex.com

Annex: **MiFID II** Required Data Positions

- EEX provides default values as defined in the Participation Form
- Market access providers and participants with positions booked on agency accounts (A1, A2 etc.) are supposed to review and amend the position holder details to identify the correct end-client
- Short codes need to be uploaded to the EEX Member Section to provide national IDs or Legal Entity Identifiers (LEIs)
- The following attributes must be amended with the required data of the end-client:

| Position |
|---|
| Position holder ID |
| Position holder category |
| Email address of position holder |
| Ultimate parent entity ID |
| Email address of ultimate parent entity |
| Parent of collective investment scheme status |

Annex: MiFIR Required Data Transactions

- All attributes are derived from the corresponding trade.
- Participant is obliged to review these attributes and provide an amended report with the required data in case of discrepancies
- Short codes need to be uploaded to the EEX Member Section to provide national IDs and ID types

| Transaction | Source |
|------------------------------------|--|
| Trading Capacity | Value is usually determined in the trading front-end or derived from the position account (P1, A2, etc.), but RCR determines the value itself due to frequent misentries by participants. |
| Investment Decision ID | <ul style="list-style-type: none"> • National ID with ID type or algo ID. • Algo ID is directly copied from the order or trade to the draft transaction. • National ID is derived from the populated short code in the trading interface and the short code long code mapping provided by the participant via the EEX Member Section. |
| Investment Decision ID Type | |
| Investment Execution ID | |
| Investment Execution ID Type | |
| Investment Decision Branch Country | Populated with the country code of the Participant's main address as defined in the member admission forms. |
| Supervising Branch Country | |
| Buyer Details | Derived from the short code populated in the attribute 'client ID' if provided in the trade. Buyer/seller branch county code derived from the country code of the Participant's main address as defined in the member admission forms. |
| Seller Details | |
| Membership Branch Country | Derived from the country code of the Participant's main address as defined in the member admission forms. |
| Risk Reducing Indicator | Value is usually determined in the trading front-end and is also a default value as defined in the Participation Form. |