

EUROSYSTEM



General Information (Origin of Request) □ User Requirements (URD) ⊠ Other User Functional or Technical Documentation (SYS)							
Request raised by: Euroclear Institute: CSD Date raised: 28/06/2016							
Request title: Multiple pending reason cod securities and lack of cash)	ion of lack of	Request ref. no: T2S 0621 SYS					
Request type: Common		Urgency: Medium					
1. Legal/business importance parameter:	Low	2. Market implementation efforts parameter: Low					
3. Operational/Technical risk parameter: Low		4. Financial impact parameter: Medium					
Requestor Category: CSD		Status: Autho	prised at steering level				

Reason for change and expected benefits/business motivation:

T2S is checking the availability of both the securities and the cash when attempting a settlement. This behaviour is misleading and could create errors because if the securities provision if missing:

- T2S does not consider the possibility to resort to auto-collateralisation for the buyer. T2S will consider that this latter is lack of cash even though he has got securities available for auto-collateralisation
- T2S will still refresh the status and send status update messages each time the cash provision status is changing, even though securities provision is still missing

This CR requests that T2S should not do any further checks on the cash side when there are insufficient securities to settle the instruction.

Description of requested change:

T2S should modify the sending of the status messages in case of CLAC/ MONY and LACK/ CMON (for DvP and RvP instructions) and for LACK/ MONY and CLAC/ CMON (for DWP / RWP instructions).

T2S should check the securities leg first.

- <u>If the securities position is available</u> => T2S checks the cash leg and calls for auto-collateralisation if need be. The reporting to be sent to clients is either:
 - a sese.024 with the pending reason code MONY (Insufficient money in your account) + a sese.024 with the pending reason code CMON (Insufficient money in counterparty's account), or
 - a sese.025 of settlement reporting if the cash position is fine
- If the securities position is not available => T2S does not proceed to the check on the cash position. The reporting to be sent to clients is a sese.024 with the pending reason code LACK (Insufficient financial instruments in your account) + a sese.024 with the pending reason code CLAC (Counterparty Insufficient Securities).

T2S will then proceed to a reporting in 2 steps: first the securities side, and then the cash side.

Such behaviour will allow to:

- Decrease the number of messages received
- Avoid receiving status on cash positions while the issue is on the securities side

The amendment should only be done on the instruction types: DVP, RVP, DWP and RWP (FOP and PFOD to be excluded).

Submitted annexes / related documents:

Proposed wording for the Change Request:

The following UDFS sections should be modified:

A. UDFS v2.3, Chapter 1.6.1.8.4 Provision check process page 357

Provision check execution

T2S controls if the provision net flows previously calculated allow the settlement, i.e. if the resources available on the involved securities positions, cash balances and credit memorandum balance are sufficient.

This step checks (i) the securities provision net flow against the quantity available on the securities position, (ii) the cash provision net flow against the amount available on the cash balance and (iii) the CMB net flow against the amount available on the external guarantee headroom only when a client of a payment/settlement bank is involved in a Settlement Instruction.

When a lack of securities has been identified, for the instructions types DVP, RVP, DWP and RWP (FOP and PFOD are excluded), no further check of the cash provision net flow or CMB provision net flow is performed or reported.

B. UDFS v2.3, Chapter 1.6.1.8.4 Provision check process page 365

The calculation of the provision net flow for credit memorandum balance is not applicable as parties are 4 exclusively payment/settlement banks.

EXAMPLE xxx - FAILED PROVISION CHECK DUE TO A LACK OF SECURITIES (with lack of cash)

The following Settlement Instructions are received by T2S:

<u>OPE</u> ID	SECURITIES ACCOUNT	<u>ISIN</u> CODE	IMPACTED BALANCE	<u>SEC</u> MVT TYPE	<u> QTY</u>	<u>T2S</u> <u>DEDI-</u> <u>CATED</u> <u>CASH</u> <u>AC-</u> <u>COUNT</u>	<u>CUR.</u>	<u>CRED</u> DEB INDIC	<u>AMOUNT</u>
<u>SI1</u>	<u>SA1</u>	<u>ISIN X</u>	AWAS	<u>RECE</u>	<u>500</u>	DCA1	<u>EUR</u>	<u>DBIT</u>	<u>10,000.00</u>
<u>SI2</u>	<u>SA2</u>		<u>AWAS</u>	<u>DELI</u>	<u>500</u>	DCA2		<u>CRDT</u>	<u>10,000.00</u>

T2S calculates the provision net flows and, then, the provision check execution of each securities position (SecPos1 and SecPos2) and cash balance (CashBal1 and CashBal2) involved:

<u>OPERATION</u>	SECUR	RITY SIDE	CAS	H SIDE
	SECPOS1 SA1 ISIN X AWAS	<u>SECPOS2</u> SA2 ISIN X AWAS	<u>CASHBAL1</u> <u>DCA1</u> <u>DLVR</u>	<u>CASHBAL2</u> <u>DCA2</u> <u>DLVR</u>
<u>SI1</u>	<u>+500</u>		<u>-10,000.00</u>	
<u>SI2</u>		<u>-500</u>		<u>+10,000.00</u>
Provision net <u>flow</u>	<u>+500</u>	<u>-500</u>	<u>-10,000.00</u>	<u>+10,000.00</u>
<u>Availability</u>	<u>+250</u>	<u>+100</u>	<u>+7,000.00</u>	<u>+1,000.00</u>
External guar- antee head- roomProvision check process				
Provisionc check execution	<u>+750</u> <u>OK</u>	<u>-400</u> <u>LACK</u>	<u>-3,000.00</u> <u>LACK</u>	<u>+11,000.00</u> <u>Ok</u>

As the provision check execution is negative (-400 due to a lack of securities on securities position SecPos2), the provision check failure occurs due to a lack of securities. No reporting occurs regarding the lack of cash on the cash balance CashBal1, only lack of securities is reported.

C. UDFS v2.3, Chapter 3.3.8.5.3 The message in business context pages 1533 and 1534

Message usage: Provision Check Failure

This message usage relates to the usage of status advice message, sent by T2S, to advice about a failure provisioning check.

Specific message requirements

To inform about a pending status due to provisioning check failure, the SecuritiesSettlementTransactionStatusAdviceV03 includes the following information:

Pending – status that corresponds to 'Pending' with one or more reason codes to inform about the unsuccessful provisioning check;

(...)

Message usage example 1:

sese.024.001.03_T2S_ProvisionFailureDueToALackOfSecuritiesWithLackOfCash_Example1.xml

Firstly CSD Participant A (PRTAFRPPXXX) with a securities account "100000123' in T2S has instructed the delivery of 100,000 securities ISIN000001 to its counterparty CSD Participant B (CSDPBBICXXX) with cash account "200000456", and its CSD B (CSDBBIC1XXX) versus a payment of 575,000 Euros, for settlement on the 21/2/2017. In this example, T2S first informs a failure in the provisioning check via a pending status providing the corresponding T2S Matching Reference (Supplementary Data). The T2S party delivering the securities, CSD Participant A, has insufficient securities to settle the Settlement Instruction and the auto-collateralisation process failed due to insufficient external guarantee headroom on the credit memorandum balance. As the provision check for the securities side is negative, a sese.024 is sent to CSD Participant A with ISO reason code LACK, and no further provision check is performed on the cash side.

Message usage example 2:

sese.024.001.03 T2S ProvisionFailureDueToALackOfSecuritiesWithLackOfCash Example2.xml

Following Example1, CSD Participant A sends enough securities for the correct settlement of the transaction to securities account 1000000123. Then, the provision check is executed again. As no lack of securities is identified, T2S checks now the cash side provision, which has a negative result due to the insufficient external guarantee headroom on the CMB. A sese.024 is sent to CSD Participant A with ISO reason code CMON.

The following GFS sections should be modified:

D. GFS v5.3, 3.5.6.3 Description of the functions of the module – Chapter 2 Common Limit and Provision Checking for the following functions and illustrations, pages 382/383 and 385-388

Execution of the provision-checking

Reference Id SETT.VPB.CLP.6.1

The function checks in a first time:

• For each involved securities positions, if the related provisioning net flow can be settled with the available quantity **{T2S.07.272}**;

Then in a second time and only if the securities provisioning net flow is successful:

- For each involved cash balance if the related provisioning net flow can be settled with the available amount {T2S.07.274};
- For each involved credit memorandum balance regarding a client of a payment/settlement bank if the related provisioning net flow can be settled with the available external guarantee headroom **{T2S.07.278}**.

This provision-checking does not apply to accounts which are allowed to have a negative balance (i.e. T2S CB cash account, RTGS transit accounts and Issuer CSD balance accounts **{T2S.07.274}**).

When the provision-checking is executed:

- If the provision-checking is successful, the function sends the collection to the Pre-empting function **{T2S.07.220}**;
- Else, if the provision-checking detects a lack of cash, a lack of securities or insufficient external guarantee headroom the function sends the collection to the lack and insufficient headroom management or partial settlement management sub-function.

Partial settlement of settlement transaction related to settlement instruction

Reference Id

SETT.VPB.CLP.7.4

If a solution is found, the function sends the collection to the Pre-empting function. Otherwise, the function sends the collection to the Failure Management and Settlement Outcome function with the reason for settlement failure for the settlement transaction¹⁴⁰ **{T2S.07.260}**.

¹⁴⁰ If a Settlement Transaction is involved in a lack of securities and in a lack of cash, the function fills in the reason code with the code corresponding to the reason "Lack of cash and securities".

Illustrations of the provision-checking concepts and processes

Reference Id

SETT.VPB.CLP.8.1

The following illustrations are independent of each other and have increasing complexity.

They describe the different cases of provision-checking:

- Provision-checking limited to securities side involving cash balance and CB collateralisation;
- Provision-checking involving credit memorandum balance, client-collateralisation and use of unsecured credit;
- I Provision-checking involving use of securities restriction and CB collateralisation;
- Provision-checking involving cash restriction, CB collateralisation and client-collateralisation.

Each case contains one or two tables that illustrate the provision-checking concepts and processes according to the possible contents of collection and provision-checking result.

•••

Illustration 1 : Provision-checking limited to the securities side involving cash balance and CB collateralisation

Reference Id

SETT.VPB.CLP.8.2

The following table presents an illustration of the provision-checking concepts and processing:

COLLECTION	N SECURITIES SIDE				CASH SIDE			
	SA1	SA2	SA3	SA4	DCA1	DCA2	DCA3	
	SP1	SP2	SP3	SP4	CB1	CB2	CB3	
ST1	+10		-10		-22	+22		
ST2		+14	-14			-30	+30	
ST3	-30			+30	+43		-43	
ST4	-18		+18		+30	-30		
ST5			+50	-50		+64	-64	
ST6	+8			-8				
NET FLOWS	-30	+14	+44	-28	+51	+26	-77	
Available	+12	+2	0	+50	+21	0	0	
External Guarantee Headroom								
PROVISION CHECK RESULT	-18 LACK	+16 OK	+44 OK	+22 OK	+72 OK <u>N/A^x</u>	+26 OK <u>N/A^x</u>	-77 LACK <u>N/A^x</u>	
Unsecured Credit Headroom								
Collateralisation Headroom								
CALL TO COLLATERALI SATION								

Based on a collection C1 of six settlement transactions, for which the parties are exclusively payment/settlement banks, the *Common Limit and Provision Checking* function calculates the provisioning net flows of each deliverable securities positions (SP1 to SP4) and cash balances (CB1 to CB3) involved in the collection.

For each securities position one, the function executes the provision-checking by subtracting from the available quantity or amount available in the relevant securities positions and cash balances the provisioning net flows.

If the provision-checking is positive (here SP2, SP3 and SP4), the provisioning net flows can be settled during the booking.

If the provision-checking is negative (here SP1-and CB3), the provisioning net flows cannot be settled during the booking. Then the function tries to fill in the lacks by:

- I Sending a request to Intraday Credit Provider functions for Settlement Transactions associated to Settlement Instructions if all the lacks of cash are smaller than the CB collateralisation headroom associated to the T2S Dedicated Cash Account via a relevant credit memorandum balance;
- Sending a request to Lack Security Manager function for Settlement Transactions associated to Settlement Instructions for the lack of securities
- Searching involved Settlement Transactions which can be partially executed (i.e. only for the settlement restriction: reservation, earmarking and immediate Liquidity Transfer with the Partial Execution set to "Yes");
- During the partial window, calling the Partial Settlement Preparation function if necessary.

Foot note x: Cash Side provided for completeness. In the case of a lack of securities the cash provision check is not performed.

High level description of Impact:

Outcome/Decisions:

* CRG meeting on 6/7 July 2016: The CRG decided to put the Change Request on hold.

* CRG meeting on 6 September 2016: The CRG indicated that after the Change Request is updated, it can be considered mature from a content point of view and therefore, it is ready for its preliminary assessment.

* CRG on 17 October 2016: During the written procedure from 10 - 17 October 2016, the CRG recommended to launch the preliminary assessment on the Change Request from 24 October 2016 to 15 November 2016 (batch 2).

* OMG on 08 November 2016: During a written procedure from 28 October - 08 November 2016, the Operations Managers Group did not identify any blocking operational impact of the Change Request.

* CRG telco on 16 November 2016: The CRG took note of the T2S functionalities/modules impacted by the Change Request following the 4CB preliminary assessment.

* CRG meeting on 24 January 2017: The CRG recommended to launch the detailed assessment of the Change Request and asked the 4CB to check the feasibility to deliver the Change Request in the T2S Release 2.0.

* Advisory Group on 02 February 2017: In a written procedure from 26 January 2017 to 02 February 2017, the Advisory Group was in favour of launching the detailed assessment on the Change Request.

* CSD Steering Group on 03 February 2017: In a written procedure from 26 January 2017 to 03 February 2017, the CSD Steering Group was in favour of launching the detailed assessment on the Change Request.

* CRG meeting on 24 April 2017: The CRG recommended the Change Request for approval and its inclusion in the T2S Release 2.0.

* RMSG meeting on 28 April 2017: The Release Management sub-group was of the view that the Change Request is not feasible within the T2S Release 2.0 from a planning perspective given the current envisaged deployment dates in the interoperability and production environments on 6 April and 9 June 2018 respectively.

* Operational Mangers Group on 4 May 2017: Following a written procedure from 26 April - 4 May 2017, the Operations Managers Group reconfirmed that the Change Request does not have any blocking operational impact and was in favour of adding the Change Request to the T2S Release 2.0.

* CRG Telco on 5 May 2017: The CRG was of the view that the Change Request 621 is mandatory from a functional perspective and asked the RMSG to check all possible solutions to deliver it as part of the T2S Release 2.0.

* RMSG on 12 May 2017: The RMSG did not raise any objection on the delivery planning for Change Request 621 within T2S Release 2.0.

* Advisory Group on Market Infrastructures for Securities and Collateral (AMI-SeCo) on 8 June 2017: Following a written procedure from 02 to 08 June 2017, the AMI-SeCo was in favour of approving the Change Request and its inclusion in T2S Release 2.0.

* CSD Steering Group on 9 June 2017: Following a written procedure from 02 to 09 June 2017, the CSG adopted the resolution to approve the Change Request and its inclusion in T2S Release 2.0.

Preliminary assessment:

- Impacted functionality / module: SETT, LCMM
- Financial impact parameter: Medium (preliminary assessed)
- Following issues have to be clarified before the start of detailed assessment:
 - What would be the reason for failure that should be provided if securities have been pledged and there is not enough cash to reimburse and no other securities to substitute: Lack of cash? If yes, is there a need to evaluate a potential lack of cash?
 - Update CR of last sentence in the Description Section to include RWP: "The amendment should be done on instruction types DVP; RVP, DWP AND RWP".

No further functional, technical and risk related issues have been identified beyond the elements already described in the Change Request.

	St	atic data management	Int	erface		
		Party data management		Communication		
		Securities data management		Outbound processing		
		T2S Dedicated Cash account data management		Inbound processing		
		Securities account data management				
	Rules and parameters data management					
linnert	Se	ttlement	Lic	quidity management		
Impact On T2S		Standardisation and preparation to settlement		Outbound Information Management		
.20	Х	Night-time Settlement		NCB Business Procedures		
		Daytime Recycling and optimisation		Liquidity Operations		
	Х	Daytime Validation, provisioning & booking	LC	MM		
		Auto-collateralisation		Instructions validation		
			Х	Status management		
	Op	perational services		Instruction matching		
		Data Migration		Instructions maintenance		
		Scheduling	Statistics, queries reports and archive			
		Billing		Report management		
		Operational monitoring		Query management		
				Statistical information		
				Legal archiving		
		All modules (Infrastructure request)				
		No modules (infrastructure request)				
		Business operational activities				
		Technical operational activities				

EUROSYSTEM ANALYSIS - GENERAL INFORMATION

Impact on major documentation						
Document	Chapter	Change				
Impacted GFS chapter	§3.5.6.3 Description of the functions of the module - 2 Common Limit and Provision Checking , pages 382-383 and 385-388	Update of the Execution of the provision- checking and illustrations				
Impacted UDFS chapter	§1.6.1.8.4 Provision check process page 357	Addition of footnotes describing absence of cash provision check when lack of securities and the inclusion of an example for lack of securities and lack of cash.				
	§3.3.8.5.3 The message in business	Update the provision check failure message usage and example description. Inclusion of new				

	context		example.			
Additional deliveries for Message Specification						
UHB						
External training materials						
Other documentations						
Links with other req	uests: CR-0515					
Links R	eference		Title			
OVERVIEW OF THE IMP	PACT OF THE REQUEST ON TH	IE T2S SYSTEM AND C	ON THE PROJECT			
Summary of function	nal, development, infrastru	ucture and migratior	impacts			
report a lack of cash	utes the provision check in on a settlement instruction ble for auto-collateralisation	on for which the cou				
	y misleading information a y if the security provision c		T2S needs to be change	d to execute the cash		
	T2S should not report any amic reimbursement funct		urities if the expected qua	ntity of securities is		
First of all, T2S syst collateral	em checks if the required	securities are availa	able even resorting to reir	nbursement of reverse of		
 ⇒ If no, do not proceed to the cash provision check and report o the pending reason code LACK associated to the BR B-SETT-ALL-ALL-0014 o and for the counterpart, the pending reason code CLAC associated to the BR B-SETT-ALL-ALL-0015 						
Else check the cash leg with the help of auto-collateralisation and External Guarantee Headroom if needed						
If the provision check is OK, send a settlement confirmation to the customer						
Else re	eport, as currently, for an i	•				
 the pending reason code MONY associated to the BR B-SETT-ALL-ALL-0014 and/or BR B-SETT-ALL-ALL-0012 and for the counterpart, the pending reason code CMON associated to the BR B-SETT- ALL-ALL-0015 and/or B-SETT-ALL-ALL-0013 						
Summary of project risk						
Security analysis						
No potentially adver	rse effect was identified du	uring the security as	sessment.			



DG - Market Infrastructure & Payments Market Infrastructure Management **ECB-PUBLIC**



07 April 2017

Cost assessment on Change Requests

T2S-621-SYS – Multiple pending reason codes (combination of lack of securities and lack of cash)						
One-off	Assessment cost* - Preliminary - Detailed	2,000.00 10,000.00	Euro Euro			
One-off	Project phase costs	320,481.35	Euro			
Annual	Operational costs	34,610.73	Euro			

*The relevant assessment costs will be charged regardless of whether the CR is implemented (Cf. T2S Framework Agreement, Schedule 7, par. 5.2.3).