ACER 1st wave consultation on REMIT Implementing Regulation technical guidance

Eurelectric consultation response paper

July 2026

ACER 1st wave consultation on REMIT Implementing Regulation technical guidance

KEY MESSAGES

- Eurelectric recognises and appreciates ACER's effort to develop the Guideline on REMIT transaction reporting and other technical guidance in a timely manner to facilitate the understanding of the data reporting rules and requirements under REMIT and the REMIT Implementing Regulation. We also warmly welcome the opportunity to contribute suggestions for improvements via webinars, workshops and this first wave of consultations.

- At the same time, we find it important to note that these consultations raise a wide range of legal, operational and industrial issues, the thorough analysis of which is considerably time-consuming for associations and Members thereof, especially for a large and complex AEMP like Eurelectric.

- Against this background, we sought to provide comprehensive feedback on the most crucial matters for our sector. This notwithstanding, we would appreciate the possibility to provide feedback on the entire scope of the current public and targeted consultations also during the 2nd wave (as opposed to only allowing feedback on the modifications after the 1st wave). This would grant sufficient time to complete the review and provide additional substantiated recommendations.

Dépôt légal: D/2026/12.105/32

ACER public consultation: Guideline on REMIT transaction reporting

Fields marked with * are mandatory.

Introduction

Background

Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency (“REMIT”) establishes a framework to ensure the integrity and transparency of wholesale energy markets across the Union.

In 2024, REMIT was revised, introducing new and updated data reporting requirements. These changes were further specified in Regulation (EU) No 2026/256 on data reporting (recast REMIT Implementing Regulation), which sets out detailed rules on data reporting obligations, market participant registration, inside information disclosure, and monitoring procedures to ensure consistent enforcement of REMIT across EU wholesale energy markets.

Scope of the Guideline on transaction reporting

The revised REMIT introduced a new possibility for ACER to develop guidelines and recommendations to national regulatory authorities or market participants (Article 16b REMIT).

ACER has developed the Guideline on REMIT Transaction Reporting to facilitate the understanding of the data reporting rules and requirements under REMIT and the REMIT Implementing Regulation. The purpose of the Guideline on REMIT Transaction Reporting is to separate the technical guidance on how to report data to ACER, addressed in ACER's Transaction Reporting User Manual (TRUM), from the more policy-oriented aspects of data reporting, now consolidated into the Guideline on REMIT Transaction Reporting.

You can download the draft Guideline on REMIT transaction reporting here:

DRAFT_Guideline_on_REMIT_Transaction_Reporting.docx

Objective of the consultation

According to the revised REMIT, ACER shall conduct public consultations regarding the guidelines which it issues.

The objective of this consultation is to gather valuable feedback, needs and views from the public to refine the structure and content of the proposed guideline.

The survey is structured in dedicated sections following the chapters of the proposed guideline. Respondents are invited to submit their feedback on each section via the open questions below and/or by uploading documents with revision proposals in the dedicated section at the end of the survey.

Contact and deadline

The contact point for this consultation is: REMIT.Consultations@acer.europa.eu

All respondents are invited to submit their comments by 12 June 2026, 17:00 (CET)

Related documents

- Regulation (EU) No 1227/2011 of the European Parliament and of the Council of 25 October 2011 on wholesale energy market integrity and transparency, https://eur-lex.europa.eu/eli/reg/2011/1227/oj
- Regulation (EU) No 2024/1106 of the European Parliament and of the Council of 11 April 2024 amending Regulations (EU) No 1227/2011 and (EU) 2019/942 as regards improving the Union's protection against market manipulation on the wholesale energy market, https://eur-lex.europa.eu/eli/reg/2024/1106/oj
- Commission Implementing Regulation EU 2026/256 of 30 January 2026 on data reporting implementing Article 7c(2), Article 8(1a), 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 and repealing Commission Implementing Regulation (EU) No 1348/2014 http://data.europa.eu/eli/reg_impl/2026/256/oj
- ACER REMIT Transaction Reporting User Manual (TRUM) Version 7.0 (published: 17 December 2024), https://www.acer.europa.eu/remit-documents/remit-reporting-guidance
- FAQs on REMIT Transaction Reporting (published: 30 September 2024), https://www.acer.europa.eu/remit-documents/remit-reporting-guidance
- 6.1 edition of ACER Guidance on the application of REMIT (published: 18 December 2024), https://www.acer.europa.eu/remit-documents/guidance-remit-application
- Questions & Answers on REMIT policy matters (published: 12 March 2025), https://www.acer.europa.eu/remit-documents/guidance-remit-application
- ACER's Manual of Procedures on transaction and fundamental data reporting (published: 17 April 2023), https://www.acer.europa.eu/remit-documents/remit-reporting-guidance
- ACER's Requirements for Registration of RRMs (published: 15 January 2021), https://www.acer.europa.eu/remit-documents/remit-reporting-guidance
- FAQs on REMIT Fundamental Data and Inside Information (published: 30 April 2021), https://www.acer.europa.eu/remit-documents/remit-reporting-guidance
- Open Letters on Data Quality, https://www.acer.europa.eu/remit-documents/remit-reporting-guidance

- Open Letters on REMIT Policy, https://www.acer.europa.eu/remit-documents/guidance-remit-application

Respondent's data

* **Name and surname**

This information will not be published

Edoardo Tosoni

* **Email address**

This information will not be published

etosoni@eurelectric.org

Name of organisation (if applicable)

Eurelectric

Type of organisation (if applicable)

Multiple values are accepted

- [x] Market participant (including association)
- [ ] Organised marketplace (including association)
- [ ] Inside information platform (including association)
- [ ] Transmission system operator (including association)
- [ ] National regulatory authority
- [ ] Academia/research institution
- [ ] Other (please specify)

* **Country**

- (•) EU-27
- ( ) Other

Data protection, confidentiality and publication of results

Data protection

ACER will process personal data of the respondents in accordance with Regulation (EU) 2018/1725, taking into account that this processing is necessary for performing ACER's consultation tasks.

More information on data protection is available in ACER's data protection notice and on ACER's website.

ACER will not publish personal data.

* I have read and understood the Data Protection Notice on External Webinars / Online Events and Data Protection Notice on Interactions with Stakeholders.

I confirm

Confidentiality and publication

Following this consultation, ACER will make public:

- the number of responses received
- company names, unless they should be considered as confidential
- all non-confidential responses
- ACER's evaluation of responses. In the evaluation, ACER may link responses to specific respondents or group of respondents.

You may request that the name of your company or any information provided in your response is treated as confidential. To this aim, you need to explicitly indicate below whether your response contains confidential information.

* Do you consent to the publication of the name of the organisation?

- ◉ Yes
- ○ No

* Do you consent to the publication of the provided answers?

Please, note that your answer, without your name and organization, may be shared with the EU institutions and national authorities.

- ◉ Yes
- ○ No

* Does your submission contain confidential information?

Please note that submissions containing confidential information will not be published.

- ○ Yes
- ◉ No

Section I: Introduction and scope

This section covers the following topics:

- Legal framework
- Scope and purpose of the Guideline on REMIT transaction reporting
- Target audience
- Transaction reporting and market monitoring
- ACER contacts

Do you have any comments on the guidance provided in this chapter?

Section II: Reporting obligations

II.1 What to report?

This section covers the following topics:

- Transactions to be reported on a continuous basis
- Transactions to be reported on a periodic basis
- Transactions to be reported at the request of ACER
- Reporting requirements regarding transactions executed via a trade-matching system
- Definition of standard and non-standard contracts
- Distinction between product, contract and transaction for standard contracts
- Lifecycle events
- Back-loading requirement

Do you have any comments on the guidance provided in this chapter?

We have concerns about disproportionate operational burden with limited supervisory value: it is important that proposals on new data fields, lifecycle treatment, near-real-time reporting do not significantly increase operational and IT complexity without clear added value for market supervision. Major concerns specifically include, e.g.: (i) execution reporting for low-risk bilateral contracts (e.g., large consumer supply); (ii) novations treated as “cancellation plus new trade”, creating high operational risk.
We also recommend removing any legal uncertainty on what must be reported and who is responsible. In this regard, we still find ambiguity on the scope of reportable contracts, including: (i) supply contracts with final consumers above 600 GWh/year; (ii) electricity storage (including batteries, pumped storage and virtual storage); (iii) hybrid and complex products (PPAs, structured products, intra group transactions).

More specifically, on supply transactions (2.1.1.1), we note a potential ambiguity in the wording regarding supply transactions, particularly in relation to contracts with final consumers exceeding 600 GWh/year. As these contracts are subject to periodic rather than continuous reporting, we recommend explicitly clarifying that supply contracts with final customers exceeding 600 GWh/year fall under the periodic reporting regime and are not subject to continuous reporting obligations. Without such clarification, there is a risk of inconsistent interpretation and potential double reporting. Moreover, with regard to paragraph (2.1.1), execution reporting for contracts with final customers exceeding 600 GWh/year should, as a general rule, only be required upon request by ACER. Such an approach would better reflect the lower market manipulation risk associated with these contracts and ensure that the periodic reporting regime achieves its intended simplification objective.

On electricity storage transactions (2.1.1.3), where production and consumption are covered under a single contract and considering that a battery cannot qualify as a final customer, clarification is required as to whether such single contracts covering production and consumption of battery also fall within the limited reporting scope upon reasoned request by ACER if the battery capacity is ≤ 10 MW. Without clarification, different interpretations may emerge, leading to inconsistent reporting outcomes. Additionally, our current understanding is that the injection of power into, or withdrawal of power from, a battery should generally be reportable as a transaction using Table 1 and/or Table 2. However, uncertainty remains in scenarios where a party enters into a long-term tolling agreement with a battery operator (e.g. for several years of operational control over the storage unit). In such cases, it is unclear whether the arrangement itself falls within the scope of transaction reporting obligations. If such agreements are considered reportable, further clarification would be welcome regarding the appropriate reporting methodology, including (i) whether reporting should be performed under Table 1 or Table 2 and (ii) what specific fields, in particular price-related fields, should be completed.

On transactions related to balancing services (2.1.2.3): It should be explicitly specified that contracts related to balancing services, being concluded between a party and a TSO, are reportable by the TSO, or the OMP, where auctions are hosted on external platforms. Such transactions should not be reportable by any other contracting party.

On intragroup transactions (2.1.3.1): We support that all three options are put forward, as intra-group reporting should follow the group operational “reality” and not only the legal structure.

II.2 Who shall report?

This section covers the following topics:

- Reporting parties
- Who shall report transactions concluded on an organised marketplace
- Who shall report transactions concluded outside an organised marketplace
- Who shall report transportation transactions
- Who shall report storage transactions
- Who shall report lifecycle events
- Wholesale energy products already reported in accordance with MiFIR or EMIR

Do you have any comments on the guidance provided in this chapter?

We find it disproportionate to require that Market Participants have the responsibility (and hence carry out controls) on OMP reporting. This ambiguous responsibility is aggravated by the Market Participants’ lack of access to key data, particularly order book data held by OMPs. Therefore, we strongly recommend that Market Participants be relieved from any implicit responsibility - with the only exception of data that is demonstrably not in possession of the OMP - in consideration of the fact REMIT II introduced an explicit "regulatory delegation" to OMPs.

Section III: Start of reporting and reporting frequency

This section covers the following topics:

- Start of reporting
- Frequency of reporting

Do you have any comments on the guidance provided in this chapter?

Other comments and file upload

Are there any other proposals you would like to share with ACER? (e.g. topics that should be covered, amendments etc.)

Eurelectric recognises and appreciates ACER's effort to develop the Guideline on REMIT transaction reporting and other technical guidance in a timely manner to facilitate the understanding of the data reporting rules and requirements under REMIT and the REMIT Implementing Regulation. We also warmly welcome the opportunity to contribute suggestions for improvements via webinars, workshops and this first wave of consultations.
At the same time, we find it important to note that these consultations raise a wide range of legal, operational and industrial issues, the thorough analysis of which is considerably time-consuming for associations and Members thereof, especially for a large and complex AEMP like Eurelectric.
Against this background, we sought to provide comprehensive feedback on the most crucial matters for our sector. This notwithstanding, we would appreciate the possibility to provide feedback on the entire scope of the current public and targeted consultations also during the 2nd wave (as opposed to only allowing feedback on the modifications after the 1st wave). This would grant sufficient time to complete the review and provide additional substantiated recommendations.

As a first important remark, we find it disproportionate to require that Market Participants have the responsibility (and hence carry out controls) on OMP reporting. This ambiguous responsibility is aggravated by the Market Participants' lack of access to key data, particularly order book data held by OMPs. Therefore, we strongly recommend that Market Participants be relieved from any implicit responsibility - with the only exception of data that is demonstrably not in possession of the OMP - in consideration of the fact REMIT II introduced an explicit "regulatory delegation" to OMPs.
We also have concerns about disproportionate operational burden with limited supervisory value: it is important that proposals on new data fields, lifecycle treatment, near-real-time reporting do not significantly increase operational and IT complexity without clear added value for market supervision. Major concerns specifically include, e.g.: (i) execution reporting for low-risk bilateral contracts (e.g., large consumer supply); (ii) novations treated as "cancellation plus new trade", creating high operational risk.
We also recommend removing any legal uncertainty on what must be reported and who is responsible. In this regard, we still find ambiguity on the scope of reportable contracts, including: (i) supply contracts with final consumers above 600 GWh/year; (ii) electricity storage (including batteries, pumped storage and virtual storage); (iii) hybrid and complex products (PPAs, structured products, intra group transactions).
We have provided more detailed recommendations in the dedicated chapters.

You can upload your proposals in Word or PDF here.

Please ensure that all your proposed amendments are in one document, clearly identifying each section affected. Track changed versions of the document are also welcome.

Maximum file size is 1 MB. If your file is larger, please use the functional mailbox: REMIT. Consultations@acer.europa.eu

Thank you for your contribution.

Contact

Contact Form

ACER consultation: Revision of REMIT reporting (Table 1)

Fields marked with * are mandatory.

Respondent data

* First and last name of the respondent:

Edoardo Tosoni

* Email address:

etosoni@eurelectric.org

* Please select the type of organisation you represent:

- [x] Market Participant (MP)
- [ ] Organised Market Place (OMP)
- [ ] Registered Reporting Mechanism (RRM)
- [ ] Association of Energy Market Participants (AEMP)
- [ ] Transmission System Operator (TSO)
- [ ] National Regulatory Authority (NRA)
- [ ] Other

* Name of organisation:

Eurelectric

* As an MP, you are involved in transactions related to (select all that apply):

- [x] Electricity
- [ ] Natural gas

- [ ] Not applicable

* Please specify the country of registration:

- (x) EU-27
- ( ) Other country

* EU-27:

- ( ) Austria
- (x) Belgium
- ( ) Bulgaria
- ( ) Croatia
- ( ) Cyprus
- ( ) Czechia
- ( ) Denmark
- ( ) Estonia
- ( ) Finland
- ( ) France
- ( ) Germany
- ( ) Greece
- ( ) Hungary
- ( ) Ireland
- ( ) Italy
- ( ) Latvia
- ( ) Lithuania
- ( ) Luxembourg
- ( ) Malta
- ( ) Netherlands
- ( ) Poland
- ( ) Portugal
- ( ) Romania
- ( ) Slovak Republic
- ( ) Slovenia
- ( ) Spain
- ( ) Sweden

Confidentiality and data protection

By taking part in this survey you confirm to have read the Data Protection Notice on External Webinars / Online Events and the Data Protection Notice on Interactions with Stakeholders.

Introduction to the survey

Regulation (EU) No 1227/2011 of the European Parliament and of the Council on wholesale energy market integrity and transparency (REMIT) establishes a framework to ensure the integrity and transparency of wholesale energy markets across the Union.

In 2024, REMIT was revised, introducing new and updated data reporting requirements. These changes were further specified in Commission Implementing Regulation (EU) No 2026/256 (recast REMIT Implementing Regulation) which sets out detailed rules on data reporting obligations, market participant registration, inside information disclosure, and monitoring procedures to ensure consistent enforcement of REMIT across EU wholesale energy markets.

In light of this, ACER will amend the Transaction Reporting User Manual (TRUM) and the related electronic formats to reflect the updated REMIT reporting framework. This consultation is part of this update process and will feed into the final outcome with the objective to gather practical feedback on specific aspects of transaction reporting, including data field definitions, reporting structures and technical implementation, to support the update of the TRUM and the associated reporting formats.

Respondents are invited to provide their input based on their experience and expertise on the current market reality, reporting practices and systems.

The purpose of this survey is to gather feedback on proposed changes in relation to the reporting under Table 1 of the Annex to the recast REMIT Implementing Regulation for standard contracts.

The survey is organized in the following sections, in line with the Table 1 related requirements in the TRUM:

1. Chapter 2 on Supply contracts to be reported on a continuous basis (new)
2. Chapter 6.1 on Parties to the contract
3. Chapter 6.2 on Order details
4. Chapter 6.3 on Contract details
5. Chapter 6.4 on Transaction details
6. Chapter 6.6 on Optionality details
7. Chapter 6.7 on Delivery profile
8. Chapter 6.8 on Lifecycle information (Annex I to the TRUM)
9. Additional feedback

The consultation provides proposals for each regulatory novelty as follows:

- Overview of the proposed reporting guidance
- Implementation of the change introduced in the new electronic format (schema)

Respondents have the possibility of providing feedback on any point not addressed in the survey in section

"Additional feedback" (9).

How to complete the survey:

In support of the survey, the following material is available to the respondent:

- Draft TRUM (v8.0)
- Draft Annex I to the TRUM on reporting lifecycle events
- XML schema definition (XSD) file containing the new electronic format.
- Excel file providing a comparison between the existing and the new formats, highlighting the changes being introduced, their rationale, the legal text from which the change is derived (where applicable) and the section of the survey where the change is featured.

Respondents are encouraged to read the TRUM (and annex) document provided and to consult both the XSD and the Excel file available while answering the questions in the survey to better understand the context and purpose of each change.

While the questions in section "Chapter 2 of the TRUM (New)" are structured for respondents to provide direct feedback on the TRUM sections covered in this chapter, the remaining questions of the survey are structured per data field. In each case, a question on the reporting guidance or on the electronic format (schema implementation) or both is foreseen at the end of the data field section. Respondents should select one of the three options available ("Agree", "Do not agree" and "No opinion"), complementing their answer with additional remarks where relevant. In case the option "Do not agree" is selected, additional remarks must be provided in order to advance to the next section.

Contact and deadline:

The contact point for this consultation is REMIT.Consultations@acer.europa.eu.

The deadline to reply to the consultation is 12/06/2026 17:00 (CET).

Supporting material

Draft TRUM (v8.0):

ACER_REMIT_TRUM_v8.0_DRAFT_v1_for_consultation.docx

Draft Annex I to the TRUM on reporting lifecycle events:

ACER_REMIT_TRUM_ANNEX_I_v1.0_DRAFT_v1_for_consultation.docx

XML schema definition (XSD) for Table 1:

draft1.0_REMITTable1_V4.xsd

Excel Model file for Table 1 (comparison between existing and new schemas):

REMITTable1_V4_Model__Consultation_.xlsx

Chapter 2 of the revised TRUM

The newly introduced Chapter 2 of the revised TRUM aims to provide reporting guidance on supply contracts reported on a continuous basis.

Respondents are invited to provide feedback on Chapter 2.1 describing the reporting requirements for transactions related to standard contracts traded on an OMP by focusing on different ways of trading, trading arrangements and types of products and contracts. The draft revised guidance of this chapter is partially based on the currently available TRUM v7.0 and its Annexes, as well as the FAQs on REMIT transaction reporting (17th ed.).

Chapter 2.1 Reporting scenarios related to standard contracts

Chapter 2.1.1 Ways of trading

- [x] 2.1.1.1 Continuous trading within Single Intraday Coupling
- [x] 2.1.1.2 Day-ahead auctions within SDAC
- [x] 2.1.1.3 Intraday auctions within SIDC
- [x] 2.1.1.4 Pay-as-bid auctions

2.1.1.1 Continuous trading within Single Intraday Coupling

2.1.1.2 Day-ahead auctions within SDAC

2.1.1.3 Intraday auctions within SIDC

2.1.1.4 Pay-as-bid auctions

Chapter 2.1.2 Trading arrangements

- [x] 2.1.2.1 Direct Electronic Access
- [x] 2.1.2.2 Trading on an exchange with orders placed on a broker platform
- [x] 2.1.2.3 Click & Trade
- [x] 2.1.2.4 Clearing / Trade registration

2.1.2.1 Direct Electronic Access

2.1.2.2 Trading on an exchange with orders placed on a broker platform

2.1.2.3 Click & Trade

2.1.2.4 Clearing / Trade registration

Chapter 2.1.3 Type of products and contracts

- [x] 2.1.3.1 Trade at settlement
- [x] 2.1.3.2 Local flexibility products
- [x] 2.1.3.3 Gas within-day contracts

2.1.3.1 Trade at settlement

2.1.3.2 Local flexibility products

2.1.3.3 Gas within-day contracts

Chapter 6.1 Parties to the contract

This section focuses on the changes introduced to the transaction reporting regime in the following fields:

- Data field (1) ID of the market participant
- Data field (3) Liquidity provision activity (new)
- Data field (4) ID of the trader
- Data field (5) Algorithm ID (new)
- Data field (9) ID of the market participants acting on a third-party account (new)
- Data field (10) Beneficiary ID
- Data field (12) Trading capacity of the market participant or counterparty in field 1

Data Field (1) ID of the market participant

Reporting guidance:

Please provide feedback on the reporting requirements of the market participant to be identified in field 1. Respondents may focus on different trading scenarios when the identification of the market participant in this field needs further clarification in the guidance in their view.

Lifecycle reporting guidance (Annex I to the TRUM):

Please provide feedback on the proposed lifecycle reporting requirements as described in Annex I to the TRUM in Chapter 5.

* Do you agree with the proposed guidance for the reporting of the ID of the market participant?

- Agree
- Do not agree
- No opinion

* Do you agree with the proposed guidance for the lifecycle reporting of the ID of the market participant?

- Agree
- Do not agree
- No opinion

Electronic format:

Mandatory field present in the existing Table 1 format and implemented with no changes in the new schema (OrderList and TradeList sections).

Schema attributes:

```
<xs:element name="idOfMarketParticipant" type="ait1:participantType1">
      <xs:annotation>
            <xs:documentation>Field No. 1, Field No. 2 </xs:documentation>
      </xs:annotation>
</xs:element>
```

Data Field (3) Liquidity provision activity (new)

Reporting guidance:

Please provide feedback on the proposed reporting requirements on the population of the data field and the proposed definition of a liquidity provider.

Please also specify any lifecycle related reporting requirements that Annex I to the TRUM would need to clarify.

* Do you agree with the proposed reporting requirements for the Liquidity provision activity field (including lifecycle reporting requirements to be clarified)?

- Agree
- Do not agree (selected)
- No opinion

* If not agreed, please provide an alternative:

> We take note of the introduction of this new reporting requirement in the IR through this new field in Table1 and draw attention to the fact that the notion of “liquidity provider” derives from a commercial practice involving a contractual agreement between a trader and an OMP to perform services related to market liquidity. This definition therefore depends on contractual arrangements with the OMP. It excludes broader liquidity providing behaviors (e.g. proprietary market making, informal activity).
> In addition, we may consider that the proposed concept does not fully reflect the practical operation of wholesale energy trading. Liquidity provision is inherently context-dependent and may evolve according to market conditions. In many cases, it may not be possible to distinguish such activity in a clear and objective manner from ordinary proprietary trading undertaken on a participant’s own account. As a result, the proposed field gives rise to a significant risk of inconsistent interpretation and misreporting.
> If ACER requires the flagging of individual orders placed through the framework of a liquidity provision agreement, we strongly recommend that the relevant OMP should report this as it is responsible for reporting orders posted on its platform. OMPs are parties to the liquidity support agreements with traders and have all the relevant information to flag individual orders accordingly.
> We therefore recommend amending the TRUM to clarify that this field should be filled by OMPs when reporting orders as well as the field description: “The field identifies whether the order was submitted to the trading venue as part of a [liquidity service to this trading venue]”

<u>Electronic format:</u>

New field in the legal text of the recast REMIT IR, implemented as a mandatory field within the OrderList section of the schema (under sub-section fullOrderRecordDataType) to signal whether the order being reported is part of a market making strategy.

Schema attributes:

```
<xs:element name="liquidityProviderIndicator" type="xs:boolean">
    <xs:annotation>
        <xs:documentation>Field No. 3</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the implementation in the schema of the new Liquidity provision activity field?

- Agree
- Do not agree
- No opinion (selected)

Data Field (4) ID of the trader

Reporting guidance:

Please provide feedback on the revised reporting requirements proposed for the reporting of ID of the trader, by focusing on scenarios when the transaction involves algorithmic trading in particular.

* Do you agree with the proposed reporting requirements for the field ID of the trader?

- Agree
- Do not agree
- No opinion

Electronic format:

The tradeID field has been reimplemented in the schema on a simpler structure as a stand alone field in the OrderList (where the field is mandatory) and TradeList (where the field is optional) sections.

Schema attributes:

```
<xs:element name="traderID" type="ait1:traderCode" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 4</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the implementation in the schema of the field ID of the trader?

- Agree
- Do not agree
- No opinion

Data Field (5) Algorithm ID (new)

Reporting guidance:

Please provide feedback on the proposed reporting requirements on the population of the data field with regards to the identification of the algorithm and the composition of the algorithm ID.

Lifecycle reporting guidance (Annex I to the TRUM):

Please provide feedback on the proposed lifecycle reporting requirements as described in Annex I to the TRUM in Chapter 5.

* Do you agree with the proposed reporting requirements for the Algorithm ID field (including lifecycle reporting requirements)?

- Agree
- Do not agree (selected)
- No opinion

* If not agreed, please provide an alternative:

> Eurelectric welcomes ACER's effort to design the new Algorithm ID field without requiring a hardly achievable level of detail (e.g., such that a unique ID would be mapped to a unique combination of model parameters). However, while we appreciate that the Guidance does not refer to the identification of "strategies", we still maintain concerns on the requirement of a prefix to derive the general purpose of the algorithm. Same as for the identification of algorithmic strategies, these concerns are primarily about proportionality, because identifying the purpose would not give valuable information for market oversight under Article 5a of REMIT II. But concerns are also about feasibility, as the purposes cannot always be distinguished in a clear-cut manner anyway. Fundamentally, algorithms are embedded in the Market Participants' processes without a clear-cut distinction between the categories that ACER is proposing in the TRUM (asset management, vs. risk management, or other options).
> We therefore recommend a simple ID to identify the algorithm involved in a transaction with limited or no human intervention, to assist ACER in matching transactions with algorithms as needed without an ill-defined characterisation of the algorithm's purpose.

Electronic format:

New field in the legal text of the recast REMIT IR, foreseen as an optional field (simple string type) within both the OrderList and TradeList sections of the schema to identify the code of the algorithm used for the placing or conclusion of the transaction (where applicable).

Schema attributes:

```
<xs:element name="algoId" type="xs:string" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 5</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the proposed implementation in the schema of the Algorithm ID field?

- Agree
- Do not agree
- No opinion (selected)

Data Field (9) ID of the market participants acting on a third-party account (new)

Reporting guidance:

Please provide feedback on the proposed reporting requirements on the population of the data field at a transaction level, with regards to the identification of the: DEA provider, DEA client (acquiring the account of the DEA provider through direct delegation), and DEA sub-delegated client (acquiring the account of the DEA provider through the DEA client).

Respondents are invited to share their view also on the proposed application of the sub-delegated flag as explained in the section on the electronic format below.

Lifecycle reporting guidance (Annex I to the TRUM):

Please provide any feedback to be taken into consideration as a lifecycle reporting requirement in relation to Data Field (9).

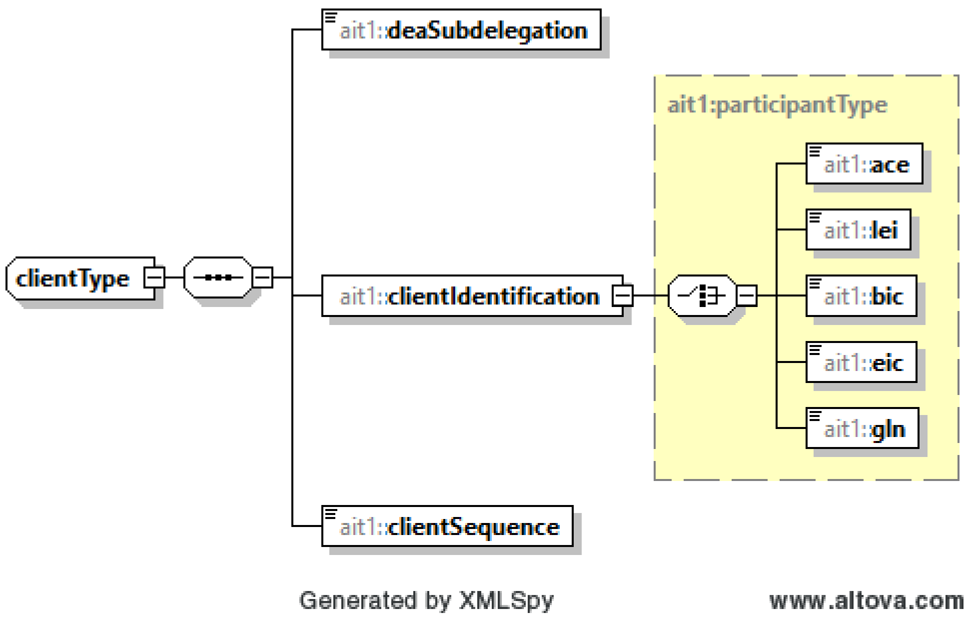
* Do you agree with the proposed reporting requirements for the field ID of the market participants acting on a third-party account (including lifecycle reporting requirements)?

- ○ Agree
- ○ Do not agree
- ◉ No opinion

Electronic format:

A sub-section of fields is foreseen within both the OrderList and TradeList sections of the schema for the reporting of direct electronic access (DEA) sub-delegations. The subsection consists of repeatable fields (under complex type clientType) where, for any sub-delegation reported, three mandatory fields must be populated:

1. deaSubdelegation: boolean flag to report further client sub-delegations in the DEA chain.
2. clientIdentification: choice of a code (from options listed under participantType) to identify the market participant.
3. clientSequence: sequence number identifying the level in the DEA chain of the market participant being identified.



Schema attributes:

```
<xs:element name="client" type="ait1:clientType" minOccurs="0" maxOccurs="unbounded">
    <xs:annotation>
        <xs:documentation>Field No. 9 and 11</xs:documentation>
    </xs:annotation>
</xs:element>

<xs:complexType name="clientType">
    <xs:sequence>
        <xs:element name="deaSubdelegation" type="xs:boolean"/>
        <xs:element name="clientIdentification" type="ait1:participantType"/>
        <xs:element name="clientSequence" type="ait1:RecordSeqNumberType"/>
    </xs:sequence>
</xs:complexType>
```

* Do you agree with the proposed implementation in the schema of field ID of the market participants acting on a third-party account (complex type "clientType")?

- ○ Agree
- ○ Do not agree
- ◉ No opinion

Data Field (10) Beneficiary ID

Reporting guidance:

Please provide feedback on the reporting requirements for the reporting of final beneficiary. Respondents may focus their feedback on transactions involving DEA.

Lifecycle reporting guidance (Annex I to the TRUM):

Please provide feedback on the proposed lifecycle reporting requirements as described in Annex I to the TRUM in Chapter 4.

* Do you agree with the proposed reporting requirements for the Beneficiary ID field (including lifecycle reporting requirements)?

- ( ) Agree
- ( ) Do not agree
- (x) No opinion

Electronic format:

The Beneficiary ID field has been reimplemented in the schema as a stand alone, optional choice structure enforcing the reporting requirement laid down in the TRUM (no changes compared to the existing schema).

```
<xs:element name="beneficiaryIdentification" type="ait1:participantType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 10 and 11</xs:documentation>
    </xs:annotation>
</xs:element>
```

Data Field (12) Trading capacity of the market participant or counterparty in field 1

Reporting guidance:

Please provide feedback on the reporting requirements for the reporting of trading capacity. Respondents may focus their feedback on transactions involving DEA.

* Do you agree with the proposed reporting requirements for the Trading capacity field?

- ( ) Agree
- ( ) Do not agree
- (x) No opinion

Electronic format:

The implementation of the tradingCapacity field has not changed in the new schema. The field remains a stand alone, mandatory field in the main OrderList and TradeList sections.

Schema attributes:

```
<xs:element name="tradingCapacity" type="ait1:tradingCapacityType">
    <xs:annotation>
        <xs:documentation>Field No. 12</xs:documentation>
    </xs:annotation>
</xs:element>
```

Chapter 6.2 Order details

This section relates to the use cases of value 'OTH' in the Table 1 fields under Order details.

The section then focuses on the changes introduced to the transaction reporting regime in the following fields:

- Data field (16) Order type
- Data field (18) Order status
- Data field (21) Undisclosed volume

General question: use case scenarios for the application of value 'OTH' for 'Other' in the Order details section

Data fields included in the Order details section such as Order type, Order condition and Order status contain the accepted value 'OTH' for 'Other'. Respondents are invited to provide use cases when the value 'OTH' would be applicable under these data fields:

Data Field (16) Order type

Reporting guidance:

Please provide feedback on the proposed reporting requirements on the population of the data field with regards to the application of the newly introduced accepted value 'HYB' for 'Hybrid'.

* Do you agree with the proposed reporting requirements for the Order type field?

- Agree
- Do not agree

◉ No opinion

Electronic format:

The implementation of the orderType field has not changed in the new schema. The field remains a stand alone, mandatory field in the main OrderList section and part of the complex type structure of the clickAndTradeDetailsType type in the TradeList section.

Schema attributes:

```
<xs:element name="orderType" type="ait1:orderTypesType">
    <xs:annotation>
        <xs:documentation>Field No. 16</xs:documentation>
    </xs:annotation>
</xs:element>
```

Data Field (18) Order status

Lifecycle reporting guidance (Annex I to the TRUM):

Please provide feedback on the lifecycle reporting requirements when there is a change in the status of the order as described in Annex I to the TRUM in Chapter 5.

* Do you agree with the proposed lifecycle reporting requirements for the Order status field?

○ Agree

○ Do not agree

◉ No opinion

Electronic format:

The orderStatus field has been implemented in the new schema on the same structure from the existing schema, but is now a mandatory field in both the OrderList and TradeList (in clickAndTradeDetailsType type) sections of the schema.

Schema attributes:

```
<xs:element name="orderStatus" type="ait1:orderStatusType" maxOccurs="unbounded">
    <xs:annotation>
        <xs:documentation>Field No. 18</xs:documentation>
    </xs:annotation>
</xs:element>
```

Data Field (21) Undisclosed volume

Lifecycle reporting guidance (Annex I to the TRUM):

Please provide feedback on the lifecycle reporting requirements when there is a change in the status of the order due to a change in the undisclosed volume as described in Annex I to the TRUM in Chapter 5.

* Do you agree with the proposed lifecycle reporting requirements for the Undisclosed volume field?

- Agree
- Do not agree
- No opinion

Electronic format:

The data field undisclosedVolume in both the OrderList and TradeList (within sub-section clickAndTrade) sections of the schema has been consolidated into a single field in the latter section.

Schema attributes:

```
<xs:element name="undisclosedVolume" type="ait1:quantityType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 21</xs:documentation>
    </xs:annotation>
</xs:element>

<xs:complexType name="quantityType">
    <xs:sequence>
        <xs:element name="value" type="ait1:number"/>
        <xs:element name="unit" type="ait1:quantityUnitType"/>
    </xs:sequence>
</xs:complexType>
```

* Do you agree with the proposed implementation in the schema of the Undisclosed volume field?

- Agree
- Do not agree
- No opinion

Chapter 6.3 Contract details

This section focuses on the changes introduced to the transaction reporting regime in the following fields:

- Data field (23) Contract ID
- Data field (25) Contract type
- Data field (27) Fixing index or reference type
- Data field (28) Fixing index type (new)
- Data field (29) Fixing index sources (new)
- Data field (30) Index fixing interval (new)
- Data field (31) Fixing frequency (new)
- Data field (48) Index value (part of the *fixingIndexDetails* section in the schema)
- Data field (32) Settlement method
- Data field (34) Type of trading venue (new)

Data Field (23) Contract ID, including the *contractInfo* sub-sections in the schema

Reporting guidance:

There are no changes foreseen in the reporting guidance for Data Field (23) Contract ID.

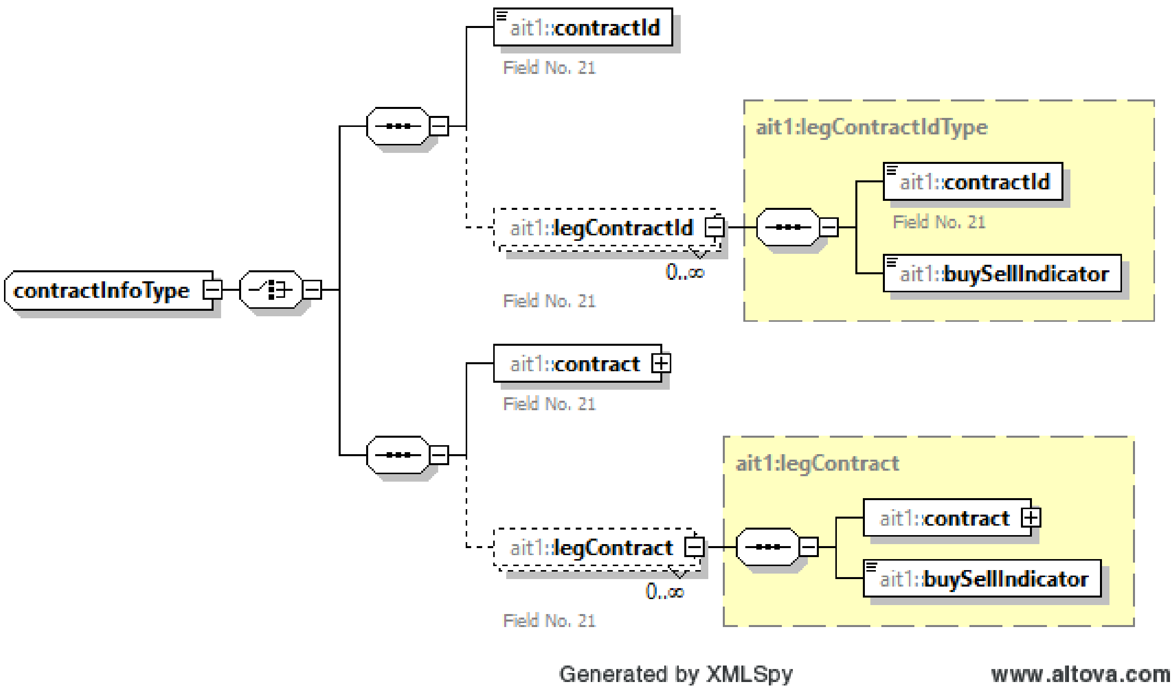
Electronic format:

The contractInfo sub-sections within both the OrderList and TradeList sections of the schema are being simplified to limit redundancy. Here:

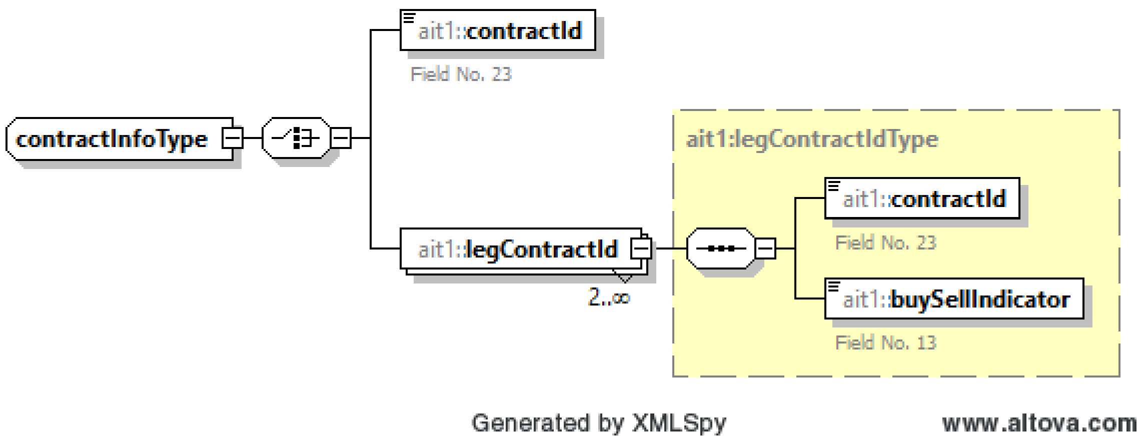
- The contractInfo fields within OrderList now only foresee a mandatory choice between fields contractId or legContractId. This last field, configured as a repeatable field for a minimum of two legs, foresees mandatory fields contractId and buySellIndicator to be reported for each leg. The choice allowing for the reporting of additional contract details within sub-section OrderList is being removed.
- The contractInfo fields within TradeList are being limited to the mandatory contractId field. The choice allowing for the reporting of additional contract details within sub-section TradeList is being removed.

In this structure, all contract details are reportable in section ContractList, which also foresees field contractId to make the link with the associated order and trade records.

Current structure of contractInfo fields:



Proposed structure of contractInfo fields:



Schema attributes:

```
<xs:complexType name="contractInfoType">
        <xs:choice>
                <xs:element name="contractId" type="ait1:contractIdType">
                        <xs:annotation>
                                <xs:documentation>Field No. 23</xs:documentation>
                        </xs:annotation>
                </xs:element>
                <xs:element name="legContractId" type="ait1:legContractIdType" minOccurs="2" maxOccurs="
                unbounded"/>
        </xs:choice>
</xs:complexType>
```

* Do you agree with the proposed restructuring of the fields related to the Contract ID field (under contractInfo)?

- ( ) Agree
- ( ) Do not agree
- (•) No opinion

Data Field (25) Contract type

Reporting guidance:

Please provide feedback on the revised description of the reporting guidance available under Data Field (25), especially on the newly introduced value *AU_PAB = Pay as bid auction*. In addition, please provide use cases for the application of contract type 'OTH' for 'Other'.

* Do you agree with the proposed reporting guidance for the Contract type field?

- ( ) Agree
- ( ) Do not agree
- (•) No opinion

Electronic format:

The contractType field is foreseen as one of the mandatory fields in section ContractList (and removed from all other sections to limit redundancy).

Schema attributes:

```
<xs:element name="contractType" type="ait1:contractTypeType">
        <xs:annotation>
                <xs:documentation>Field No. 25</xs:documentation>
        </xs:annotation>
</xs:element>
```

Data fields related to fixing details:

- **Data Field (27) Fixing index or reference price**
- **Data Field (28) Fixing index type (new)**
- **Data Field (29) Fixing index sources (new)**
- **Data Field (30) Index fixing interval (new)**
- **Data Field (31) Fixing frequency (new)**
- **Data Field (48) Index value**

Reporting guidance:

Please provide feedback on the proposed requirements and list of accepted values under the relevant data fields for the reporting of a fixing index in Table 1. This is considered applicable when the price of the contract the reported transaction refers to is fixed by an index.

In their feedback respondents are invited to focus on the revised reporting requirements of the value of the index and when there is a deviation from the value of the fixing index specified in the contract.

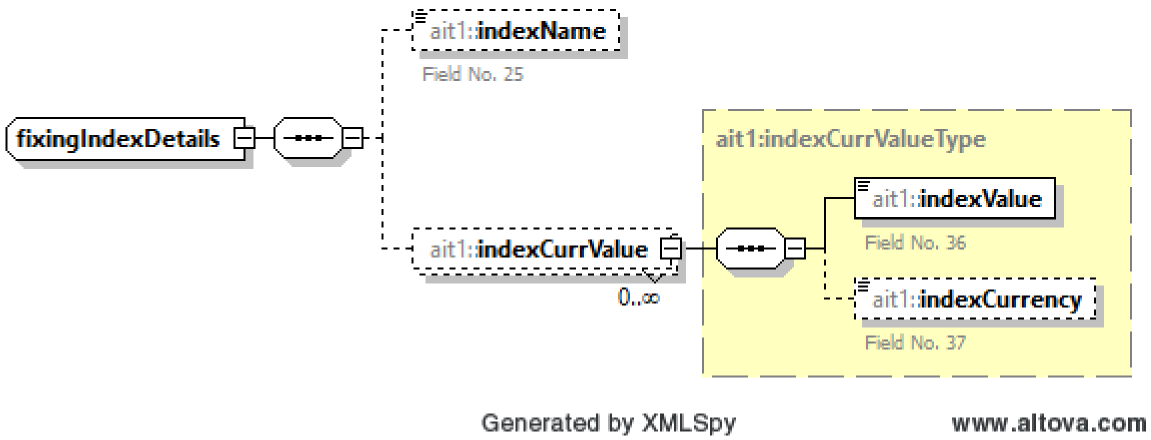
* Do you agree with the proposed reporting guidance for the fixing details fields?

- Agree
- Do not agree
- No opinion

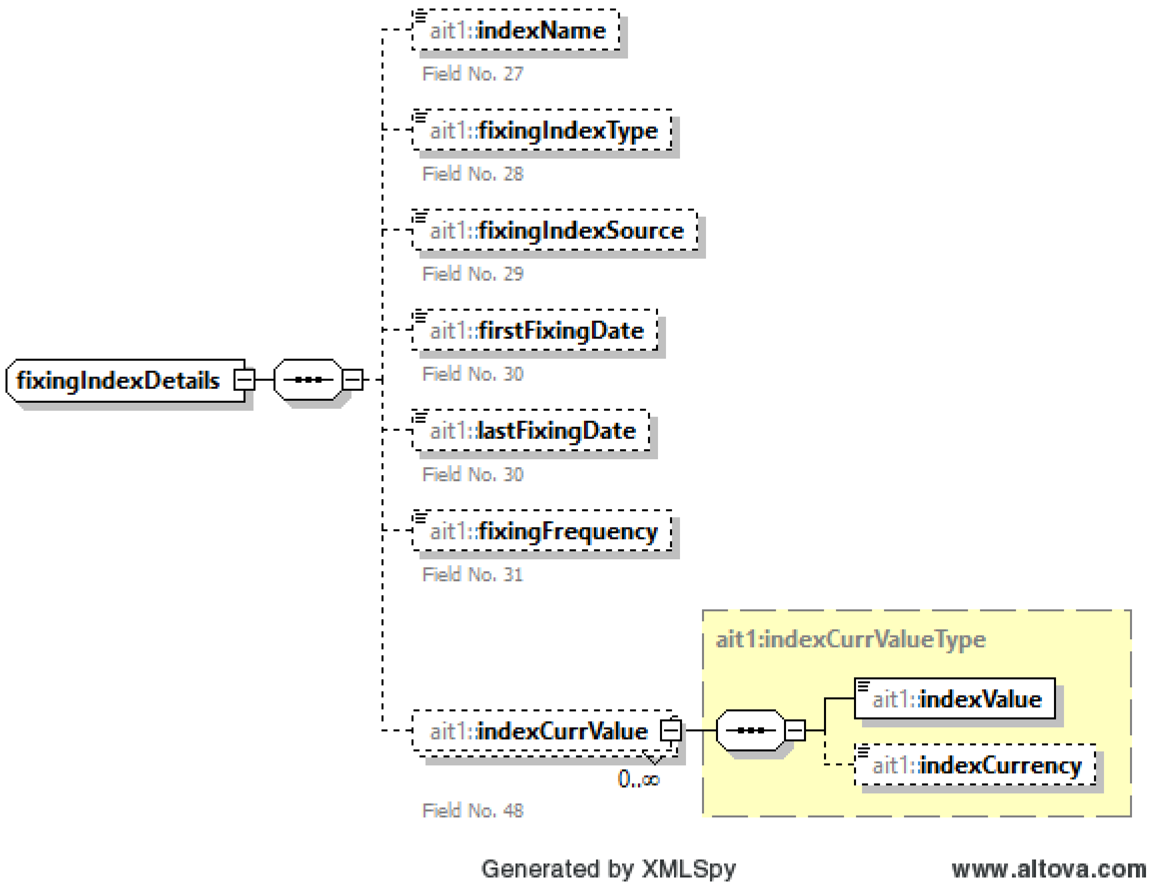
Electronic format:

The fixingIndexDetails complex type (included in both OrderList and TradeList sections) has been expanded to include new additional sub-fields (listed above) to complete the reported index details.

Current structure for fixingIndex fields:



Proposed structure for fixingIndex fields:



Schema attributes:

```
<xs:complexType name="fixingIndexDetails">
    <xs:sequence>
        <xs:element name="indexName" type="ait1:fixingIndexType" minOccurs="0">
            <xs:annotation>
                <xs:documentation>Field No. 27</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="fixingIndexType" type="ait1:contractTypeType2" minOccurs="0">
            <xs:annotation>
                <xs:documentation>Field No. 28</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="fixingIndexSource" type="ait1:restrictedString" minOccurs="0">
            <xs:annotation>
                <xs:documentation>Field No. 29</xs:documentation>
            <xs:annotation>
        </xs:element>
        <xs:element name="firstFixingDate" type="xs:date" minOccurs="0">
            <xs:annotation>
                <xs:documentation>Field No. 30</xs:documentation>
            <xs:annotation>
```

```
        </xs:element>
        <xs:element name="lastFixingDate" type="xs:date" minOccurs="0">
            <xs:annotation>
                <xs:documentation>Field No. 30</xs:documentation>
            <xs:annotation>
        </xs:element>
        <xs:element name="fixingFrequency" type="ait1:frequencyType" minOccurs="0">
            <xs:annotation>
                <xs:documentation>Field No. 31</xs:documentation>
            <xs:annotation>
        </xs:element>
        <xs:element name="indexCurrValue" type="ait1:indexCurrValueType" minOccurs="0" maxOccurs="
        unbounded">
            <xs:annotation>
                <xs:documentation>Field No. 48</xs:documentation>
            <xs:annotation>
        </xs:element>
    </xs:sequence>
</xs:complexType>
```

* Do you agree with the proposed schema implementation for the fixing details fields?

- ( ) Agree
- ( ) Do not agree
- (•) No opinion

Data Field (32) Settlement method

Reporting guidance:

Please provide feedback on the revised list of accepted values proposed for Data Field (32), including their applicable description.

Revised list of accepted values:

- P = Physically settled without optionality
- C = Cash settled without optionality
- P_OP = Physically settled with optionality
- C_OP = Cash settled with optionality

* Do you agree with the proposed reporting guidance for the Settlement method field?

- ( ) Agree
- ( ) Do not agree

No opinion

Electronic format:

The settlementMethod field is now only implemented in the ContractList section of the schema (and no longer within sub-section contractInfo in OrderList and TradeList) to limit redundancy.

Schema attributes:

```
<xs:element name="settlementMethod" type="ait1:settlementMethodType">
    <xs:annotation>
        <xs:documentation>Field No. 32</xs:documentation>
    </xs:annotation>
</xs:element>
```

Data Field (34) Type of trading venue (new)

Reporting guidance

Please provide feedback on the list of accepted values proposed for Data Field (34), including their proposed description.

Revised list of accepted values:

- RM = Regulated Market
- MTF = Multilateral Trading Facility
- OTF = Organised Trading Facility

* Do you agree with the proposed reporting guidance for field Type of trading venue?

- Agree
- Do not agree
- No opinion

Electronic format:

New field in the recast REMIT IR, implemented as an optional field in section ContractList of the schema.

Schema attributes:

```
<xs:element name="typeOfTradingVenue" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 34</xs:documentation>
```

```
        </xs:annotation>
        <xs:simpleType>
            <xs:restriction base="ait1:typeOfTradingVenueType"/>
        </xs:simpleType>
</xs:element>
```

* Do you agree with the proposed schema implementation for field Type of trading venue?

- Agree
- Do not agree
- No opinion

Chapter 6.4 Transaction details

This section focuses on the changes introduced to the transaction reporting regime in the following fields:

- Data field (37) Transaction timestamp
- Data field (41) Voice-brokered
- Data field (42) Post-trade event (new)
- Data field (43) Transaction type (new)
- Data field (44) Bidding ID (new)
- Data field (45) Price
- Data field (46) Price formula (new)
- Data field (49) Price currency and unit
- Data field (53) Quantity/Volume
- Data field (54) Total notional contract quantity

Data Field (37) Transaction timestamp

Reporting guidance:

Respondents are invited to provide feedback on the clarification on the reporting of Zulu time and on reporting the local time with offset.

* Do you agree with the proposed reporting guidance for field Transaction timestamp?

- Agree
- Do not agree
- No opinion

Electronic format:

The transactionTime field has been implemented in the new schema with the same structure of the existing schema (no changes).

Schema attributes:

```
<xs:element name="transactionTime" type="ait1:dateTimeRestriction">
    <xs:annotation>
        <xs:documentation>Field No. 37</xs:documentation>
    </xs:annotation>
</xs:element>
```

Data Field (41) Voice-brokered

Reporting guidance:

Please provide feedback on the list of accepted values that have been revised in order to indicate whether the order placed via voice assisted brokering was visible to the market.

Revised list of accepted values:

- On-Screen
- Off-Screen
- No

* Do you agree with the proposed reporting guidance for field Voice-brokered?

- ( ) Agree
- ( ) Do not agree
- (x) No opinion

Electronic format:

Optional field in existing Table 1 format, reimplemented as a mandatory field with a new, non-boolean data type definition (voiceBrokeredType) enumerating the new values specified in the reporting guidance.

Schema attributes:

```
<xs:element name="voiceBrokered" type="ait1:voiceBrokeredType">
    <xs:annotation>
        <xs:documentation>Field No. 41</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the proposed schema implementation for field Voice-brokered?
  - Agree
  - Do not agree
  - No opinion

Data Field (42) Post-trade event (new)

Reporting guidance:

Please provide feedback on the list of accepted values and their description proposed under the data field:

- Give-up
- Take-up

* Do you agree with the proposed reporting guidance for field Post-trade event?
  - Agree
  - Do not agree
  - No opinion

Electronic format:

New field in the recast REMIT IR, implemented as an optional field in the TradeList section of the schema.

Schema attributes:

```
<xs:element name="postTradeEvent" type="ait1:postTradeEventType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 42</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the proposed schema implementation for field Post-trade event?
  - Agree
  - Do not agree
  - No opinion

Data Field (43) Transaction type (new)

Reporting guidance:

Please provide feedback on the list of accepted values and their description proposed under the data field:

- CL = Cleared
- BM = Batch matching
- WT = Wash trade

* Do you agree with the proposed reporting guidance for field Transaction type?

- Agree
- Do not agree
- [x] No opinion

Electronic format:

New field implemented as an optional, repeatable field and part of the main TradeList section of the schema.

Schema attributes:

```
<xs:element name="TransactionType" type="ait1:TransactionType" minOccurs="0" maxOccurs="unbounded"
>
    <xs:annotation>
        <xs:documentation>Field No. 43</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the proposed schema implementation for field Transaction type?

- Agree
- Do not agree
- [x] No opinion

Data Field (44) Bidding ID (new)

Reporting guidance:

Please provide feedback on the proposed reporting requirements of the data field in relation to unit-based bidding and portfolio-based bidding.

* Do you agree with the proposed reporting guidance for field Bidding ID?

- Agree
- Do not agree
- [x] No opinion

Electronic format:

New field implemented as an optional field in the OrderList (within sub-section fullOrderRecordDataType) and TradeList sections of the schema.

Schema attributes:

```
<xs:element name="biddingId" type="ait1:unitIdType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 44</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the proposed schema implementation for field Bidding ID?

- ○ Agree
- ○ Do not agree
- ● No opinion

Data Field (45) Price
Data Field (46) Price formula (new)
Data Field (49) Price currency and unit

Reporting guidance:

Please provide feedback on the proposed requirements on the reporting of a price formula in Table 1 related to contracts concluded on an OMP where the price of the contract is fixed by a formula.

Please also provide feedback on the proposed guidance on how to populate Data Field (46) when the price of the contract is fixed by a differential from a fixing index.

Lifecycle reporting guidance (Annex I to the TRUM):

Please provide feedback on the lifecycle reporting requirements related to the modification of the price information as described in Annex I to the TRUM for trades and orders.

* Do you agree with the proposed reporting guidance for fields Price, Price formula, Price currency and unit (including lifecycle reporting requirements)?

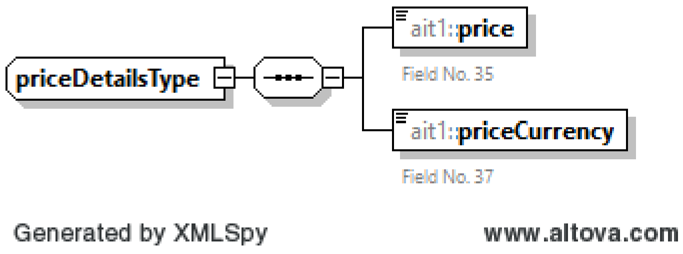
- ○ Agree
- ○ Do not agree
- ● No opinion

Electronic format:

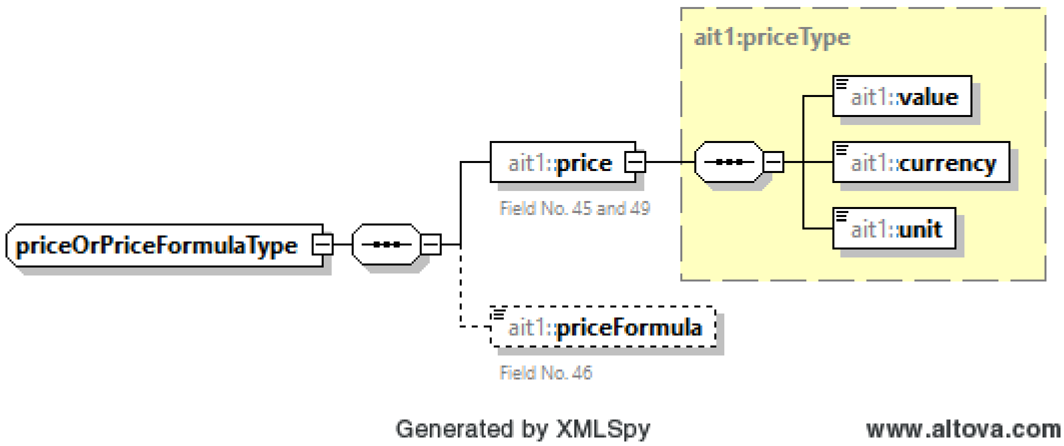
The fields in the priceDetails structure (price and priceCurrency) within the OrderList and TradeList sections of the existing schema have been restructured into a new priceOrPriceFormula structure. Here a sequence of two sub-elements has been introduced:

- price as a mandatory field and itself a sequence of three sub-elements: value (field 45), currency and unit (field 49) for the reporting of the price details.
- priceFormula (46) as an optional field for the reporting of the price formula.

Current structure for priceDetails type:



Proposed structure for priceOrPriceFormula type:



Schema attributes:

```
<xs:element name="priceOrPriceFormula" type="ait1:priceOrPriceFormulaType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No.45, 46 and 49</xs:documentation>
    </xs:annotation>
</xs:element>

<xs:complexType name="priceOrPriceFormulaType">
    <xs:sequence>
```

```
            <xs:element name="price" type="ait1:priceType">
                <xs:annotation>
                    <xs:documentation>Field No. 45 and 49</xs:documentation>
                </xs:annotation>
            </xs:element>
            <xs:element name="priceFormula" type="ait1:restrictedString1000" minOccurs="0">
                <xs:annotation>
                    <xs:documentation>Field No. 46</xs:documentation>
                </xs:annotation>
            </xs:element>
        </xs:sequence>
</xs:complexType>
```

* Do you agree with the proposed schema implementation of the priceOrPriceFormulaType complex type?

- ○ Agree
- ○ Do not agree
- ● No opinion

Data Field (53) Quantity/volume
Data Field (54) Total notional contract quantity

Lifecycle reporting guidance:

Respondents are invited to refer to Annex I of the TRUM to consult the revised guidance proposed on how to report events such as partially match and refill in relation to the quantity information for orders (see Chapter 5.2.4). Respondents are also invited to comment on the reporting requirements for reporting quantity modification for trades (see Chapter 5.3.2).

* Do you agree with the proposed lifecycle reporting guidance for fields Quantity/volume and Total notional contract quantity?

- ○ Agree
- ○ Do not agree
- ● No opinion

Electronic format:

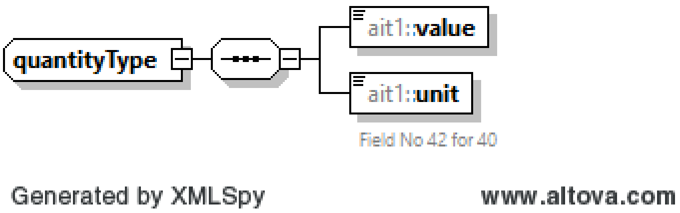
The structures of the Quantity/volume (53) and Total notional contract quantity (54) fields have been revised significantly in the new schema. The new structures are implemented differently in the OrderList and TradeList sections:

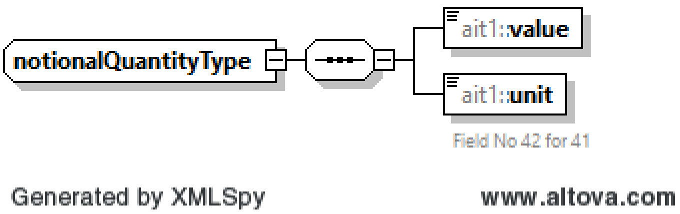
- OrderList:

- fullRercordData sub-section: both quantity and totalNotionalContractQuantity are implemented as optional fields. The fields lead to a choice structure between:
    1. A sequence of three mandatory fields for the reporting of matched, visible and undisclosed quantities (value and unit).
    2. A single mandatory field for the reporting of the visible quantity (value and unit).
- modRecordData sub-section: an optional quantity field leads to a sequence of three mandatory fields where quantity (value and unit) and totalNotionalContractQuantity (value and unit) are foreseen for the reporting of modifications of quantity and total notional contract quantity through a reduced dataset.

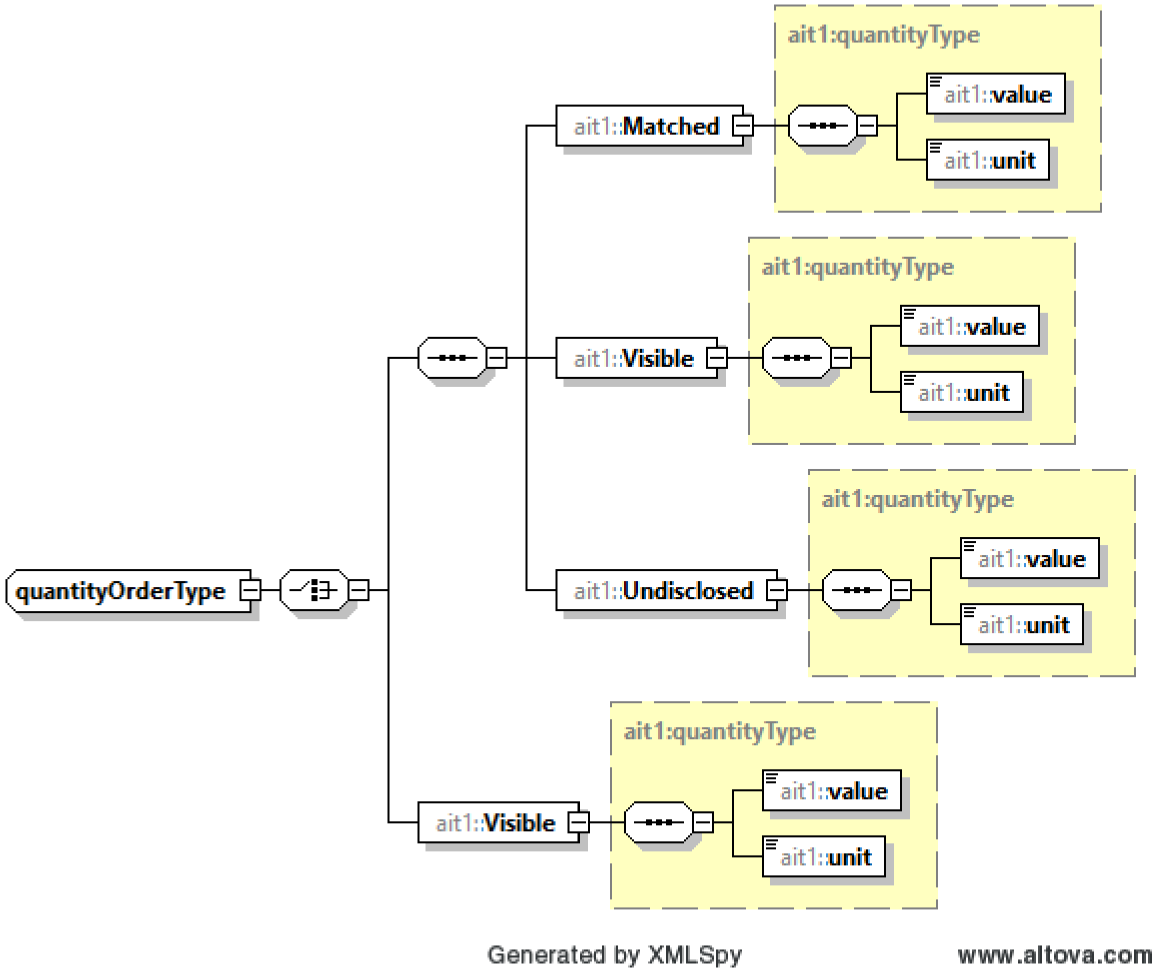
- TradeList: quantity is implemented as an optional field for the reporting of both quantity value and unit. totalNotionalContractQuantity follows a similar structure but is implemented as a mandatory field.

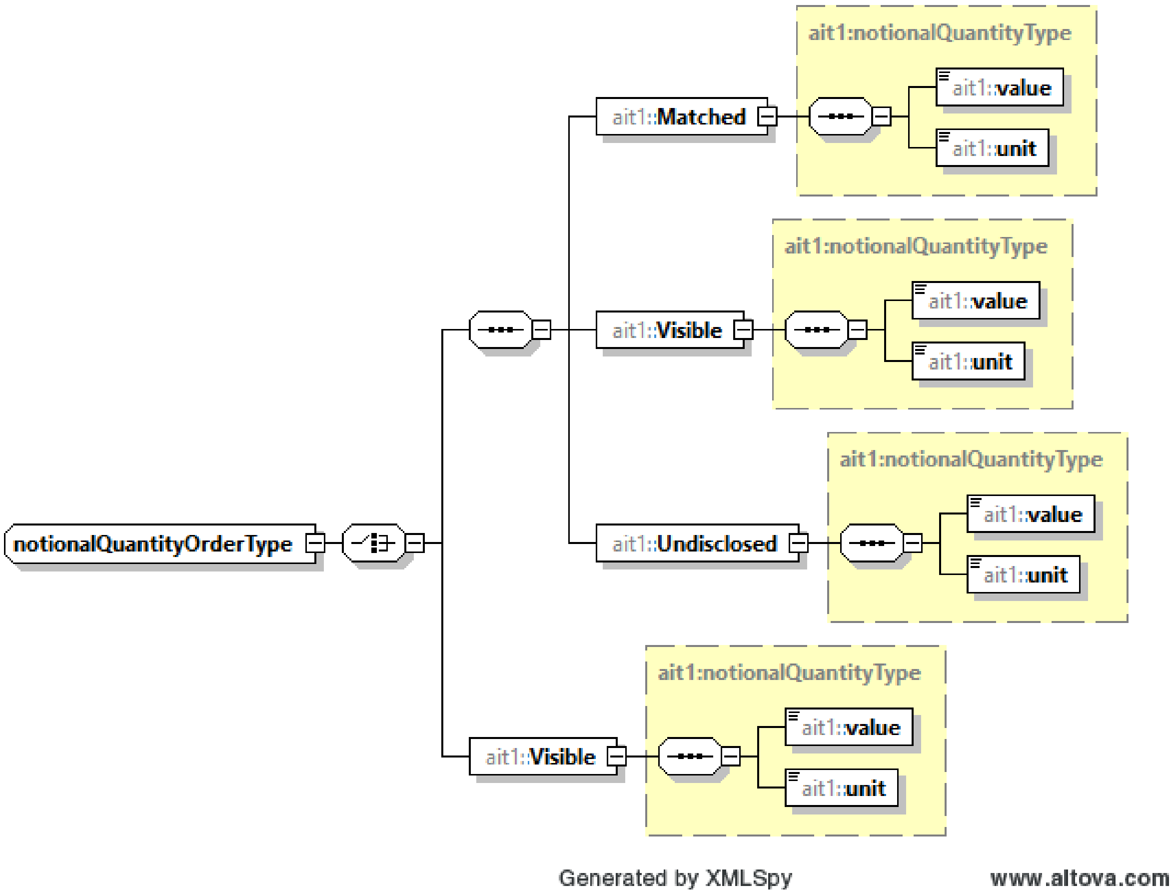
Current structure of quantity and totalNotionalContractQuantity types:

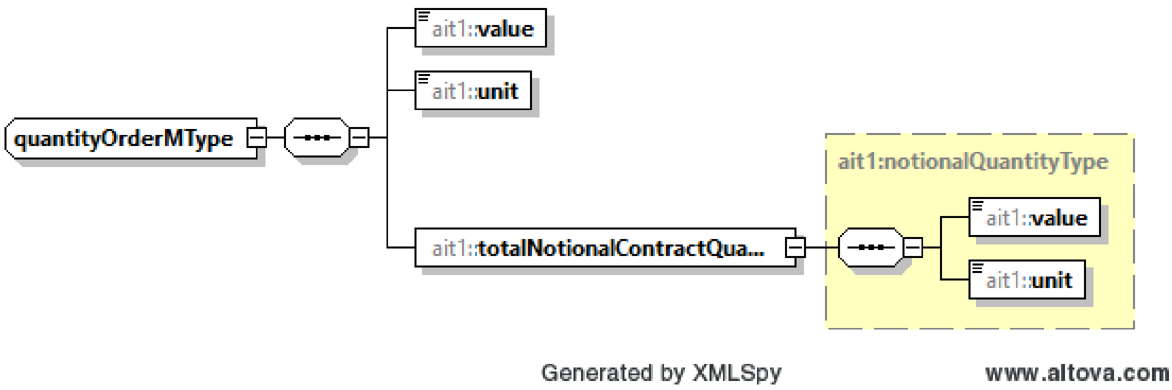




Proposed structure for quantity (quantityOrder) and notionalQuantity (notionalQuantityOrder) types:


ait1:quantityType
ait1::value
ait1::unit
ait1::Matched
ait1:quantityType
ait1::value
ait1::unit
ait1::Visible
ait1:quantityType
ait1::value
ait1::unit
quantityOrderType
ait1::Undisclosed
ait1:quantityType
ait1::value
ait1::unit
ait1::Visible
Generated by XMLSpy
www.altova.com


ait1:notionalQuantityType
ait1::value
ait1::unit
ait1::Matched
ait1:notionalQuantityType
ait1::value
ait1::unit
ait1::Visible
ait1:notionalQuantityType
ait1::value
ait1::unit
notionalQuantityOrderType
ait1::Undisclosed
ait1:notionalQuantityType
ait1::value
ait1::unit
ait1::Visible
Generated by XMLSpy
www.altova.com



Schema attributes:

```
<xs:complexType name="quantityOrderType">
    <xs:choice>
        <xs:sequence>
            <xs:element name="Matched" type="ait1:quantityType"/>
            <xs:element name="Visible" type="ait1:quantityType"/>
            <xs:element name="Undisclosed" type="ait1:quantityType"/>
        </xs:sequence>
        <xs:element name="Visible" type="ait1:quantityType"/>
    </xs:choice>
</xs:complexType>

<xs:complexType name="quantityType">
    <xs:sequence>
        <xs:element name="value" type="ait1:number"/>
        <xs:element name="unit" type="ait1:quantityUnitType"/>
    </xs:sequence>
</xs:complexType>

<xs:complexType name="notionalQuantityOrderType">
    <xs:choice>
        <xs:sequence>
            <xs:element name="Matched" type="ait1:notionalQuantityType"/>
            <xs:element name="Visible" type="ait1:notionalQuantityType"/>
            <xs:element name="Undisclosed" type="ait1:notionalQuantityType"/>
        </xs:sequence>
        <xs:element name="Visible" type="ait1:notionalQuantityType"/>
    </xs:choice>
</xs:complexType>

<xs:complexType name="notionalQuantityType">
    <xs:sequence>
```

```
            <xs:element name="value" type="ait1:number"/>
            <xs:element name="unit" type="ait1:notionalQuantityUnitType"/>
        </xs:sequence>
</xs:complexType>
```

* Do you agree with the proposed schema implementation for fields Quantity/volume and Total notional contract quantity?

- ( ) Agree
- ( ) Do not agree
- (•) No opinion

Chapter 6.6 Optionality details

This section focuses on the changes introduced to the transaction reporting regime in the following fields:

- Data field 69: Option style
- Data field 70: Option type
- Data field 71: Option exercise date or period
- Data field 72: Option exercise frequency (new)
- Data field 73: Option strike price
- Data field 74: Minimum/Maximum quantity (new)
- Data field 75: Minimum/Maximum total notional contract quantity (new)

Data Field (69) Option style
Data Field (70) Option type
Data Field (71) Option exercise date or period
Data Field (72) Option exercise frequency (new)
Data Field (73) Option strike price

Reporting guidance:

Please provide feedback on the revised data field on option exercise date or period and the newly introduced data field on option exercise frequency.

In addition respondents are invited to provide any comment or proposal they may have on the reporting requirements related to option contracts in Table 1, including information to be reported in:

- Data field (69) Option style
- Data field (70) Option type
- Data field (71) Option exercise date or period

- Data field (72) Option exercise frequency
- Data field (73) Option strike price

* Do you agree with the proposed reporting guidance for field Option style?

- Agree
- Do not agree
- No opinion

* Do you agree with the proposed reporting guidance for field Option type?

- Agree
- Do not agree
- No opinion

* Do you agree with the proposed reporting guidance for field Option exercise date or period?

- Agree
- Do not agree
- No opinion

* Do you agree with the proposed reporting guidance for field Option exercise frequency?

- Agree
- Do not agree
- No opinion

* Do you agree with the proposed reporting guidance for field Option strike price?

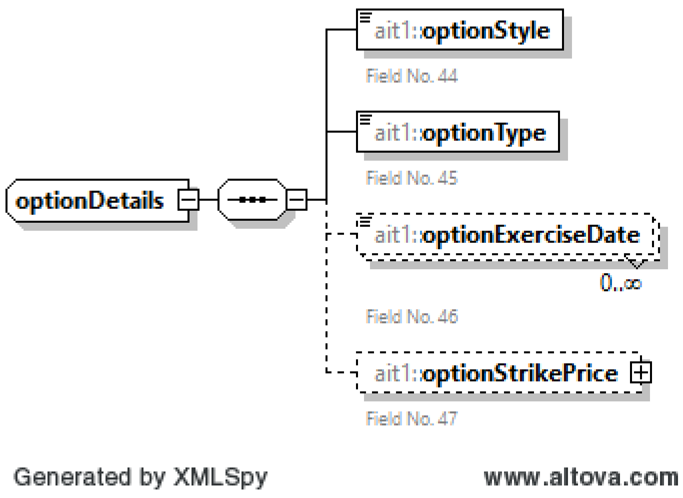
- Agree
- Do not agree
- No opinion

Electronic format:

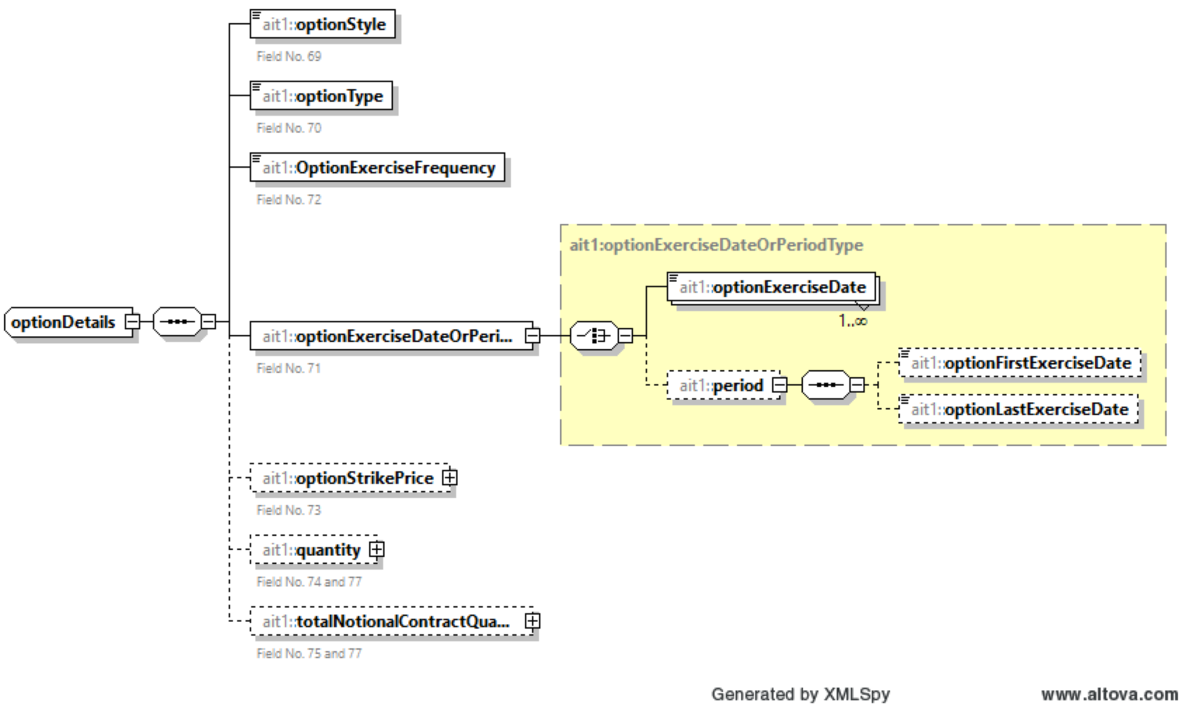
The optionDetails sub-section in the existing schema (in contractList) has been reviewed significantly to acommodate the following changes:

- The repeatable optionExerciseDate field has been made mandatory and its structure extended in a sequence that includes a new optional field, period, itself leading to a sequence of two optional fields for the reporting of the first and the last option exercise dates.
- A new mandatory field, optionExerciseFrequency, has been introduced in the structure to report the frequency of the exercise.

Current structure of the optionDetails type:



Proposed structure of the optionDetails type:



Schema attributes:

```
<xs:element name="biddingId" type="ait1:unitIdType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 44</xs:documentation>
    </xs:annotation>
</xs:element>

<xs:element name="OptionExerciseFrequency" type="ait1:frequencyType">
    <xs:annotation>
        <xs:documentation>Field No. 72</xs:documentation>
    </xs:annotation>
```

```
</xs:element>

<xs:complexType name="optionExerciseDateOrPeriodType">
    <xs:choice>
        <xs:element name="optionExerciseDate" type="xs:date" maxOccurs="unbounded"/>
        <xs:element name="period" minOccurs="0">
            <xs:complexType>
                <xs:sequence>
                    <xs:element name="optionFirstExerciseDate" type="xs:date" minOccurs="0"/>
                    <xs:element name="optionLastExerciseDate" type="xs:date" minOccurs="0"/>
                </xs:sequence>
            </xs:complexType>
        </xs:element>
    </xs:choice>
</xs:complexType>
```

* Do you agree with the proposed schema implementation of the optionDetails complex type?

- Agree
- Do not agree
- No opinion

Data Field (74) Minimum/Maximum quantity (new)
Data Field (75) Minimum/Maximum total notional contract quantity (new)

Reporting guidance:

Please provide feedback on the newly introduced data fields in relation to volume optionality in Table 1 being applicable when the contract specifying volume optionality is traded on an OMP.

* Do you agree with the proposed reporting guidance for fields Minimum/Maximum quantity and Minimum /Maximum total notional contract quantity?

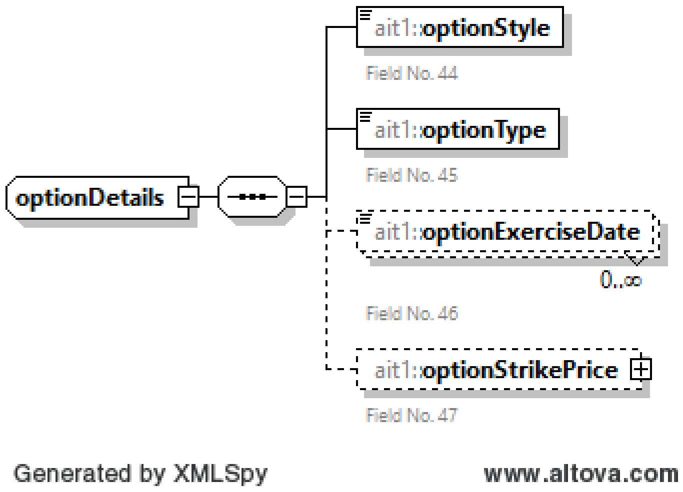
- Agree
- Do not agree
- No opinion

Electronic format:

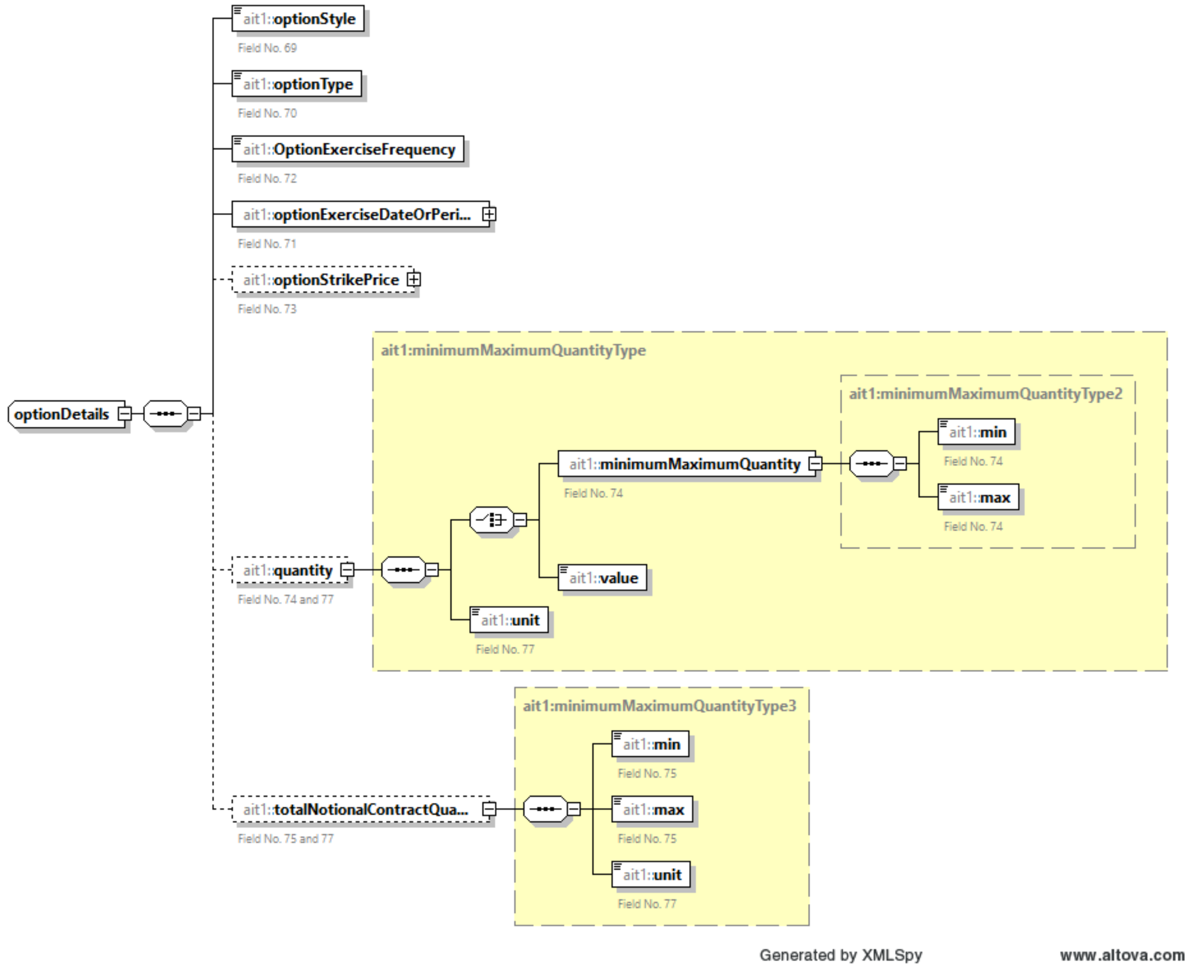
Additional optional fields have been added to the optionDetails sub-section in the existing schema (in contractList) to enable the reporting of option minimum and maximum quantities and total notional contract quantities:

- The quantity field added contains a sequence structure where:
  - The first element is a choice structure allowing for the reporting of either a single value or a sequence of a minimum and a maximum value.
  - The second element is a field to report the quantity unit.
- The total notional contract quantity field is a sequence structure of three fields to report minimum and maximum total notional contract quantities and their unit.

Current structure of the optionDetails type:



Proposed structure of the optionDetails type:



Schema attributes:

```
<xs:complexType name="minimumMaximumQuantityType">
    <xs:sequence>
        <xs:choice>
            <xs:element name="minimumMaximumQuantity" type="ait1:minimumMaximumQuantityType2"
            >
                <xs:annotation>
                    <xs:documentation>Field No. 74</xs:documentation>
                </xs:annotation>
            </xs:element>
            <xs:element name="value" type="ait1:number"/>
        </xs:choice>
        <xs:element name="unit" type="ait1:quantityUnitType">
            <xs:annotation>
                <xs:documentation>Field No. 77</xs:documentation>
            </xs:annotation>
        </xs:element>
    </xs:sequence>
```

```
</xs:complexType>

<xs:complexType name="minimumMaximumQuantityType3">
	<xs:sequence>
		<xs:element name="min" type="ait1:number">
			<xs:annotation>
				<xs:documentation>Field No. 75</xs:documentation>
			</xs:annotation>
		</xs:element>
		<xs:element name="max" type="ait1:number">
			<xs:annotation>
				<xs:documentation>Field No. 75</xs:documentation>
			</xs:annotation>
		</xs:element>
		<xs:element name="unit" type="ait1:quantityUnitType">
			<xs:annotation>
				<xs:documentation>Field No. 77</xs:documentation>
			</xs:annotation>
		</xs:element>
	</xs:sequence>
</xs:complexType>
```

* Do you agree with the proposed schema implementation for fields Minimum/Maximum quantity and Minimum /Maximum total notional contract quantity?

- ○ Agree
- ○ Do not agree
- ◉ No opinion

Chapter 6.7 Delivery profile

This section focuses on the changes introduced to the transaction reporting regime in the following fields:

- Data field 78: Delivery point or zone
- Data field 81: Duration
- Data field 82: Number of periods (new)
- Data field 83: Load type
- Data field 84: Load delivery intervals
- Data field 87: Price/time interval quantity

Data Field (78) Delivery point or zone

Reporting guidance:

Please provide feedback on the revised reporting requirements proposed under Data Field (78) with regards to the application of the EAN code when reporting local flexibility products in Table 1. For further information, see Chapter 2.1.3.2 of the revised draft TRUM.

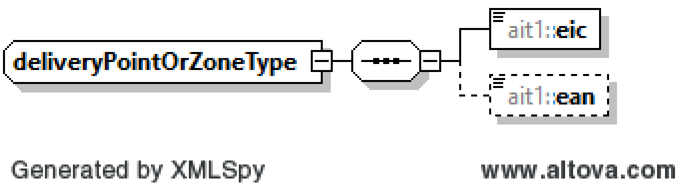
* Do you agree with the revised reporting requirements for Data Field (78) Delivery point or zone?

- ○ Agree
- ○ Do not agree
- ◉ No opinion

Electronic format:

The Delivery point or zone field, implemented in the existing schema as a single, mandatory and repeatable field in the main contractList section of the schema, has been reimplemented as a mandatory, repeatable sequence structure leading to a mandatory field to report the EIC code and an optional field to report the EAN code in addition to the EIC code.

Proposed structure of the deliveryPointOrZone type:



Schema attributes:

```
<xs:complexType name="deliveryPointOrZoneType">
     <xs:sequence>
          <xs:element name="eic" type="ait1:eic"/>
          <xs:element name="ean" type="ait1:ean" minOccurs="0"/>
     </xs:sequence>
</xs:complexType>
```

* Do you agree with the proposed schema implementation of Data Field (78) Delivery point or zone?

- ○ Agree
- ○ Do not agree
- ◉ No opinion

Data Field (81) Duration

Reporting guidance:

Please provide feedback on the description of the accepted values and on the newly introduced values on HQ = 15 minute and HH= 30 minute proposed.

* Do you agree with the proposed reporting guidance for field Duration?

- Agree
- Do not agree
- (x) No opinion

Electronic format:

The Duration field (81) has been reimplemented as a mandatory field in the new schema.

Schema attributes:

```
<xs:element name="duration" type="ait1:durationType">
    <xs:annotation>
        <xs:documentation>Field No. 81</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the proposed schema implementation of field Duration?

- Agree
- Do not agree
- (x) No opinion

Data Field (82) Number of periods (new)

Reporting guidance:

Please provide feedback on the newly introduced data field for the reporting the number of periods (NoP) included in the delivery profile of the contract, i.e. the total count of the delivery periods expressed in hourly resolution over which the contracted energy is delivered between the delivery start time and delivery end time.

* Do you agree with the proposed reporting guidance for field Number of periods?

- Agree
- Do not agree
- (x) No opinion

Electronic format:

The new Data Field (82) Number of period has been implemented as a single mandatory field in both the OrderList (under the fullRecordData sub-section) and the TradeList sections of the schema.

Schema attributes:

```
<xs:element name="NumberOfPeriod" type="ait1:restrictedDecimal">
    <xs:annotation>
        <xs:documentation>Field No. 82</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the proposed schema implementation of field Number of period?

- Agree
- Do not agree
- No opinion (selected)

Data Field (83) Load type

Reporting guidance:

Please provide feedback on the proposed removal of value ‘Other’ by describing use cases when the value would be applicable.

* Do you agree with the proposed changes in the reporting guidance for field Load type?

- Agree
- Do not agree
- No opinion (selected)

Electronic format:

The field Load type has been implemented in the new schema with the same structure of the existing schema (no changes).

Schema attributes:

```
<xs:element name="loadType" type="ait1:contractLoadType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 83</xs:documentation>
    </xs:annotation>
```

</xs:element>

Data Field (84) Load delivery intervals

Reporting guidance:

Please provide feedback on the proposed solution for the reporting of the delivery profile when reporting transactions in the xml record.

Please also provide feedback on the revised requirements proposed for the reporting of midnight as end time in the schema.

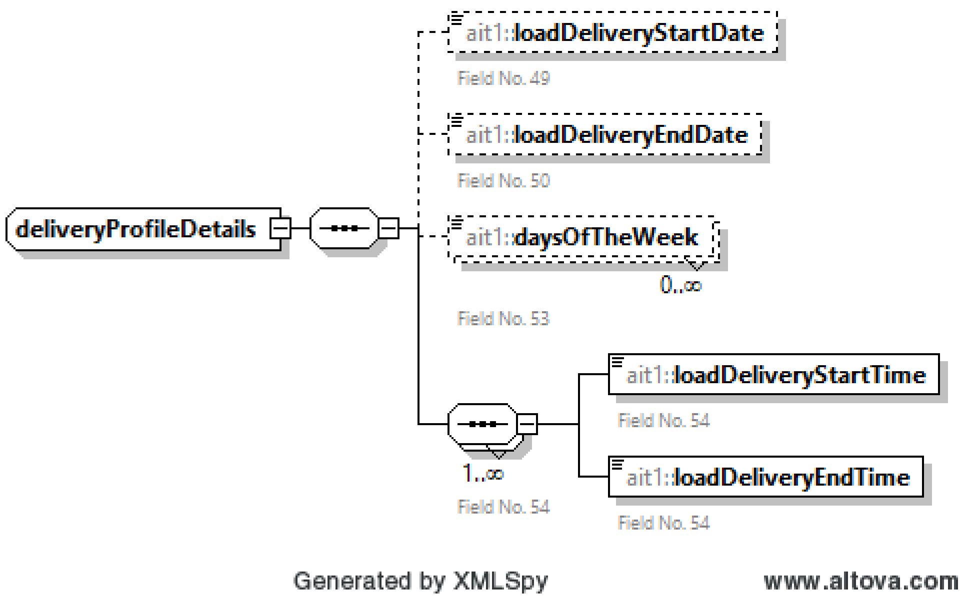
* Do you agree with the proposed reporting guidance for field Load delivery intervals?
- Agree
- Do not agree
- No opinion

Electronic format:

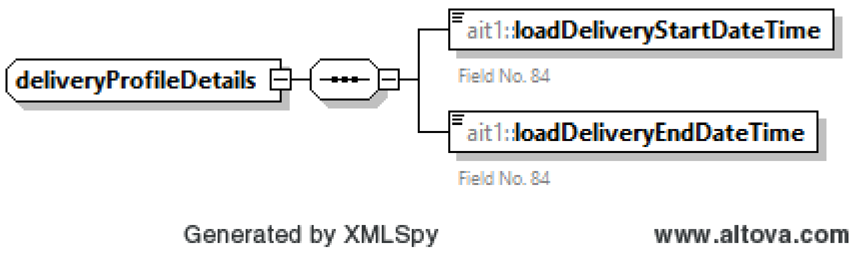
The structure of the Load delivery interval fields (84) in the existing schema is proposed to be a single, mandatory and repeatable sequence structure leading to two mandatory fields to report the load delivery start and end date and times (in "datetime" format).

Field Days of the week (field 53 in the old REMIT IR text) has been removed as it is not included in the recast REMIT IR text.

Current structure of the deliveryProfileDetails type:



Proposed structure of the deliveryProfileDetails type:



Schema attributes:

```
<xs:complexType name="deliveryProfileDetails">
	<xs:sequence>
		<xs:element name="loadDeliveryStartDateTime" type="ait1:dateTimeRestriction">
			<xs:annotation>
				<xs:documentation>Field No. 84</xs:documentation>
			</xs:annotation>
		</xs:element>
		<xs:element name="loadDeliveryEndDateTime" type="ait1:dateTimeRestriction">
			<xs:annotation>
				<xs:documentation>Field No. 84</xs:documentation>
			</xs:annotation>
		</xs:element>
	</xs:sequence>
</xs:complexType>
```

* Do you agree with the proposed schema implementation of field Load delivery intervals (in deliveryProfileDetails type), including the restrictions on the reporting of midnight as end time of the delivery profile?

- ○ Agree
- ○ Do not agree
- ◉ No opinion

Data field (87) Price/time interval quantity

<u>Reporting guidance:</u>

Please provide any feedback and/or use cases for the reporting of price/time interval quantity especially in light of the proposed solution for the reporting of the delivery profile when reporting transactions in the xml record.

* Do you agree with the proposed reporting guidance for field Price/time interval quantity?

- Agree
- Do not agree
- No opinion (selected)

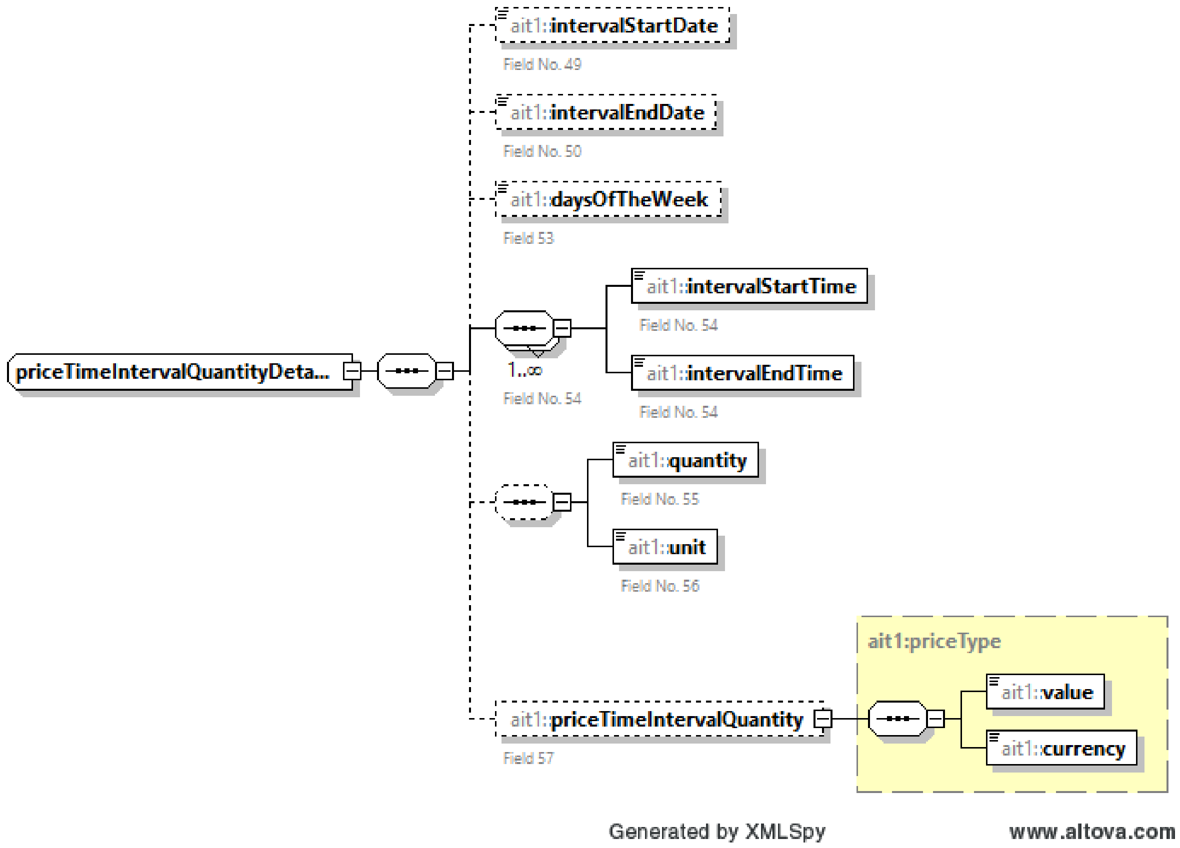
Electronic format:

The Price/time interval quantity fields in the existing schema (under the priceIntervalQuantityDetails structure in both OrderList and TradeList sections) have been simplified:

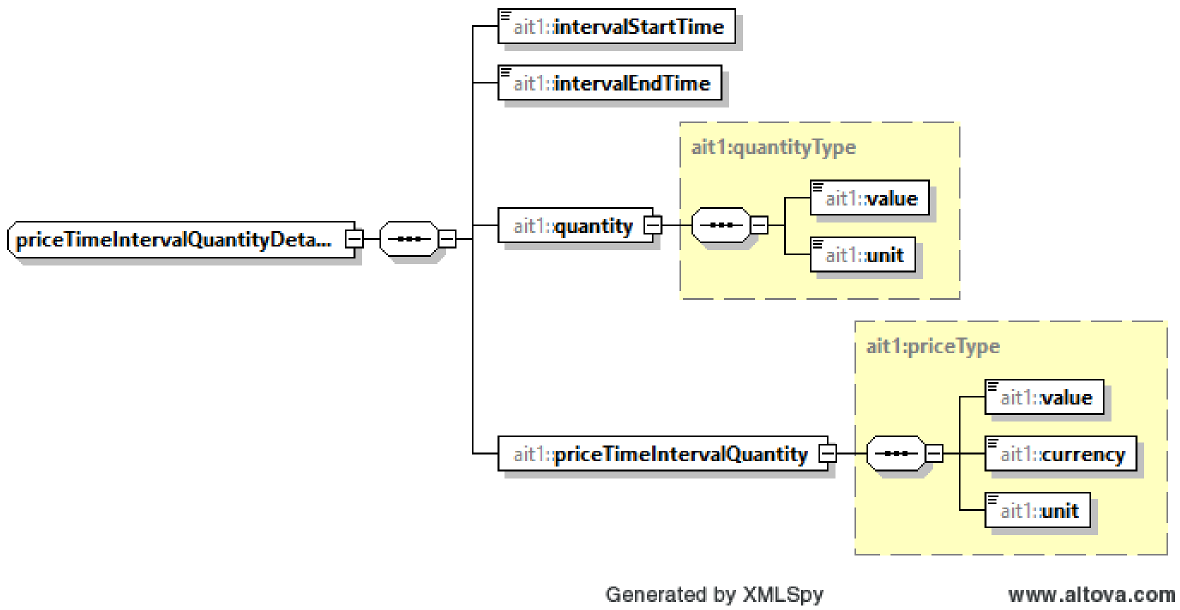
1. Fields intervalStartTime and intervalEndTime are now part of the main sequence structure under priceTimeIntervalQuantityDetails and enforced with a "datetime" restriction.
2. As a result of 1, optional fields intervalStartDate and intervalEndDate have been removed (now consolidated into fields intervalStartTime and intervalEndTime respectively).
3. Field Quantity (55) is now implemented in a sequence structure leading to two fields to report the quantity's value and unit.
4. Sequence structure of priceTimeIntervalQuantity field now includes a third field to report the price unit.
5. Field Days of the week (field 53 in the old REMIT IR text) has been removed here as well as it is not included in the recast REMIT IR text.

This new structure enforces the reporting of quantity and price details in a single interval at a time. It is also implemented in the OrderList (fullRecordData sub-section) and TradeList sections of the schema.

Current structure of the priceTimeIntervalQuantityDetails type:



Proposed structure of the priceTimeIntervalQuantityDetails type:



Schema attributes:

```
<xs:complexType name="priceTimeIntervalQuantityDetails">
    <xs:sequence>
```

```
            <xs:element name="intervalStartTime" type="ait1:dateTimeRestriction"/>
            <xs:element name="intervalEndTime" type="ait1:dateTimeRestriction"/>
            <xs:element name="quantity" type="ait1:quantityType"/>
            <xs:element name="priceTimeIntervalQuantity" type="ait1:priceType"/>
        </xs:sequence>

<xs:complexType name="quantityType">
        <xs:sequence>
            <xs:element name="value" type="ait1:number"/>
            <xs:element name="unit" type="ait1:quantityUnitType"/>
        </xs:sequence>
</xs:complexType>

<xs:complexType name="priceType">
        <xs:sequence>
            <xs:element name="value" type="ait1:number"/>
            <xs:element name="currency" type="ait1:currencyCodeType"/>
            <xs:element name="unit" type="ait1:quantityUnitType"/>
        </xs:sequence>
</xs:complexType>
```

* Do you agree with the proposed schema implementation of the priceTimeIntervalQuantityDetails type?

- ○ Agree
- ○ Do not agree
- ● No opinion

Chapter 6.8 Lifecycle information

This section focuses on the guidance and implementation of Data Field (88) Action type as proposed in the revised Annex I to the TRUM in relation to lifecycle events of order and trade records.

Data Field (88) Action type

Reporting guidance:

For the proposed reporting guidance, please refer to the draft Annex I to the TRUM.

Respondents are invited to provide general feedback on reporting lifecycle events of orders as described in Annex I to the TRUM, including modification and cancellation of orders with regards to the application of:

- Action type N
- Action type M
- Action type C
- Action type E

General feedback may also be provided on reporting lifecycle events of trades as described in Annex I to the TRUM, including modification and cancellation of trades with regards to the application of:

- Action type N
- Action type M
- Action type C
- Action type E

* Do you agree with the proposed reporting guidance for lifecycle events for orders via the allowed values for field Action type?

- ○ Agree
- ○ Do not agree
- ◉ No opinion

* Do you agree with the proposed reporting guidance for lifecycle events for trades via the allowed values for field Action type?

- ○ Agree
- ○ Do not agree
- ◉ No opinion

<u>Electronic format:</u>

The implementation of the Action type (88) field in the existing schema consists of a single mandatory field in the OrderList and TradeList sections.

This structure has been revised significantly for the new OrderList section. This section is now restructured into a sequence of the following mandatory fields:

1. RecordSeqNumber
2. idOfMarketParticipant
3. orderId
4. buySellIndicator
5. organisedMarketPlaceIdentifier
6. transactionTime
7. contractInfo
8. A choice structure between:
    - fullRecordData: this sub-section includes the remainder fields of section OrderList which, combined with 1 to 7 in the list above complete the list of fields for the reporting of orders. This

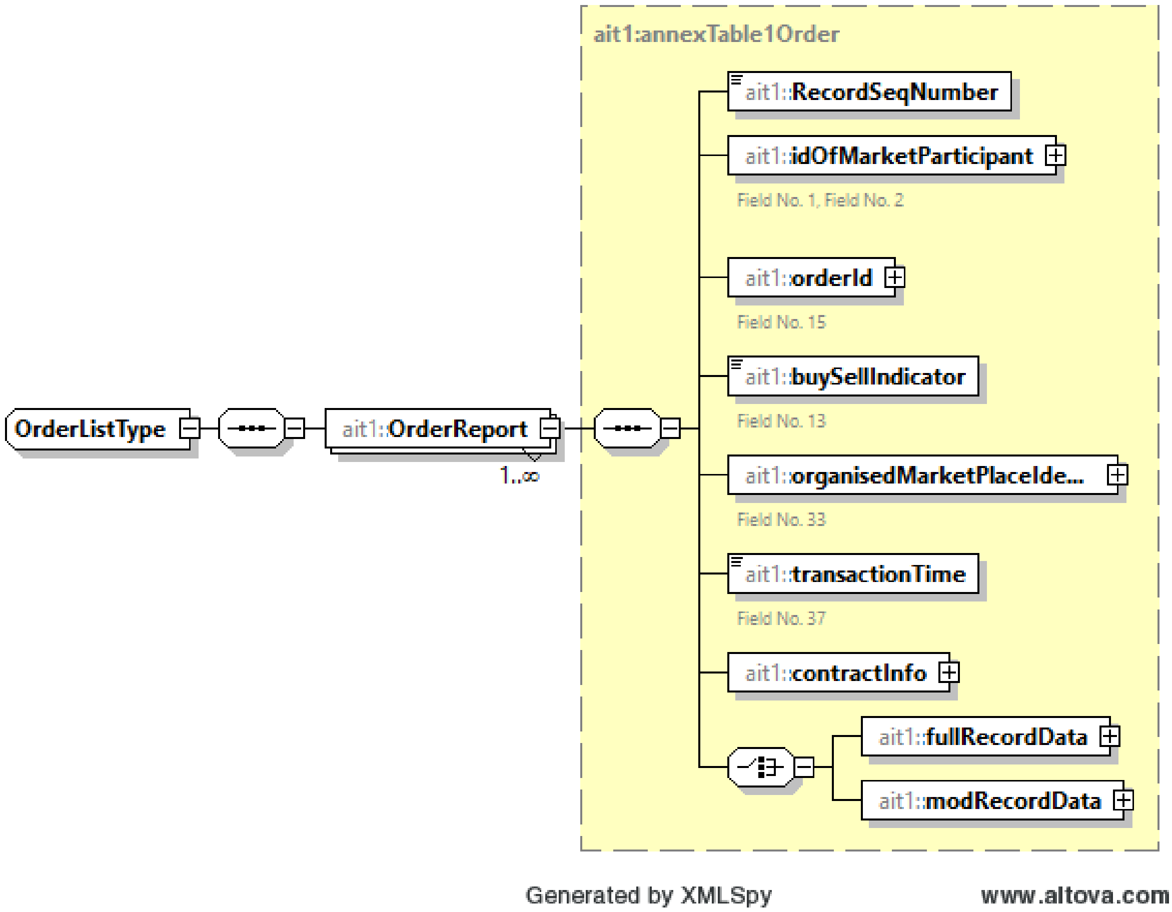
sub-section, which includes the mandatory Action type field, is foreseen to report new records (Action type 'N'), their modifications ('M') and cancellations ('C') as well as any errors ('E') in the records submitted.

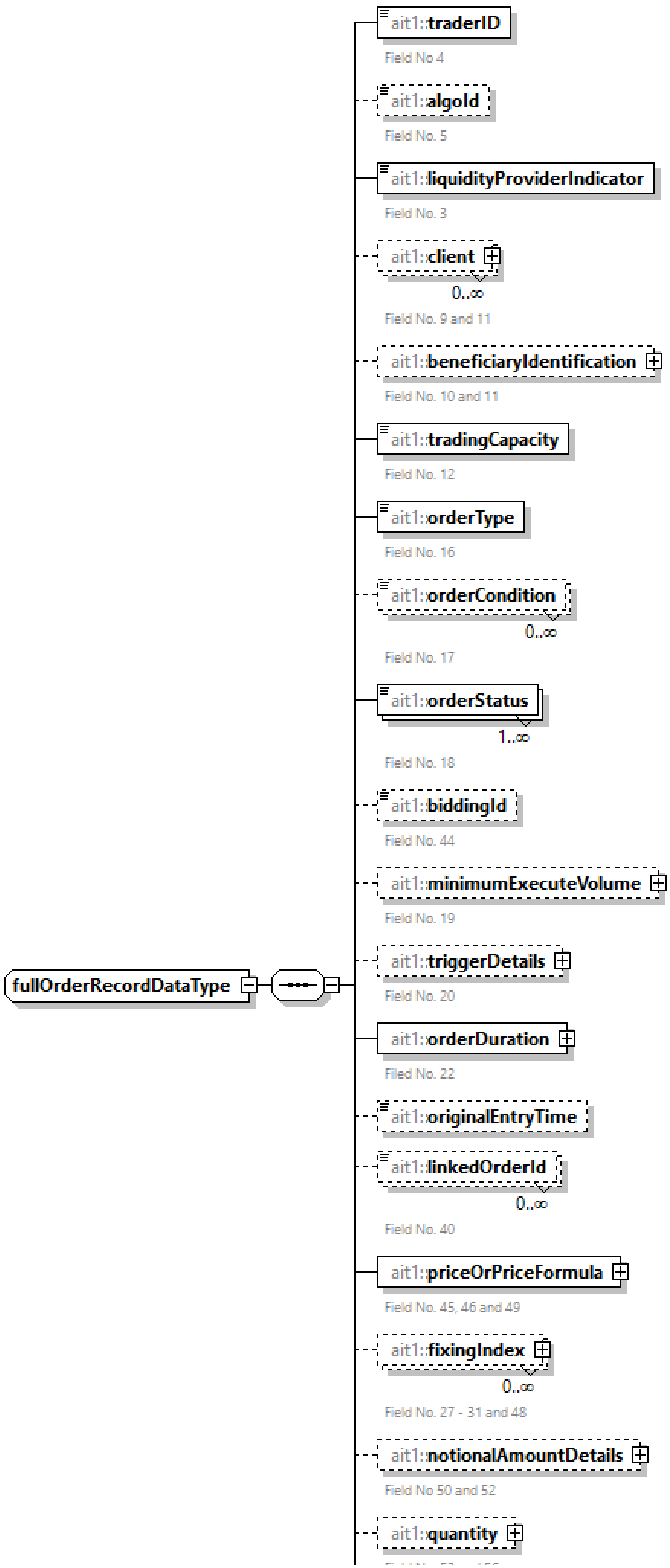
- modRecordData: this sub-section consists of a small subset of the fullRecordData fields and is only foreseen for the reporting of modifications or cancellations of fields Price (45 and 49), Quantity (53 and 56) and Total notional contract quantity (54). The allowed values in the Action type field implemented in this sub-section are therefore restricted to 'M' and 'C'.

The implementation of the Action type field in the TradeList section of the schema has not been revised.

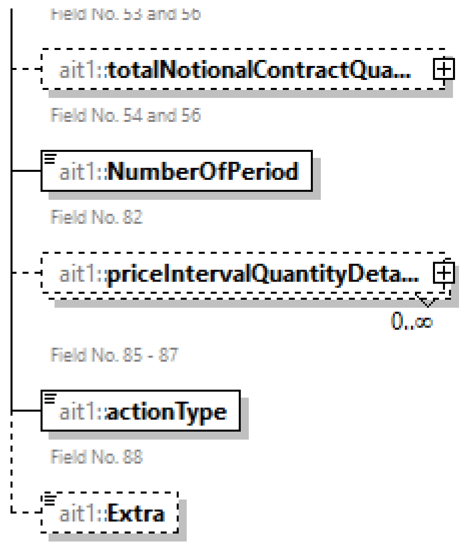
In addition, a separate Action type field has been implemented in a new, optional section of the schema named errorFileActionList (under complex type fileActionType). This section allows to error out complete files to facilitate the bulk correction of records.

Proposed structure of the OrderList section, fullRercordData and modRecordData sub-sections:

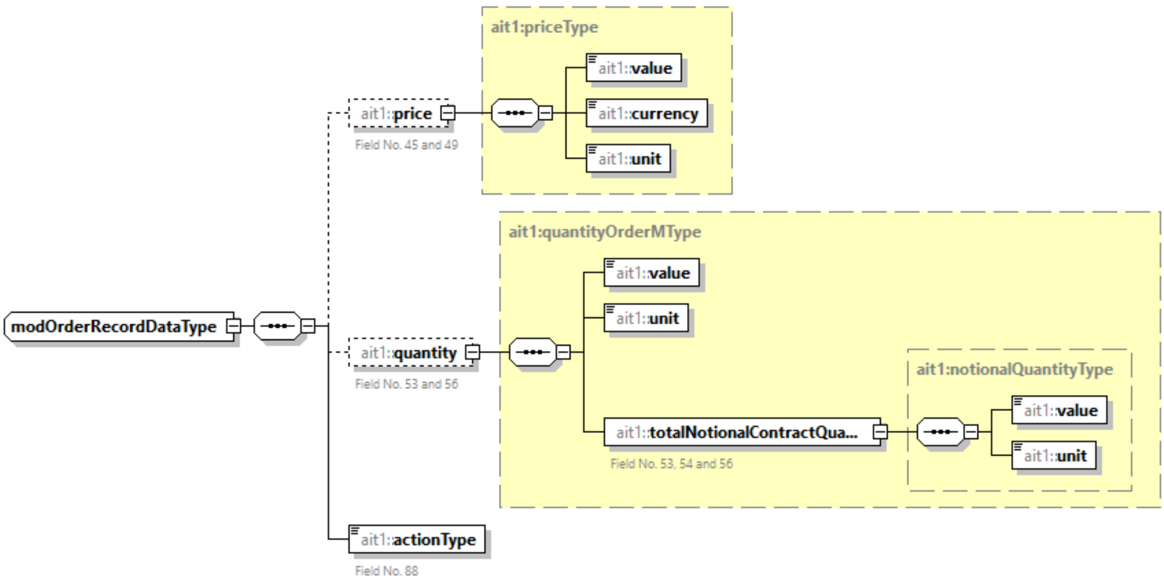




fullOrderRecordDataType
ait1::traderID
Field No 4
ait1::algoId
Field No. 5
ait1::liquidityProviderIndicator
Field No. 3
ait1::client
0..∞
Field No. 9 and 11
ait1::beneficiaryIdentification
Field No. 10 and 11
ait1::tradingCapacity
Field No. 12
ait1::orderType
Field No. 16
ait1::orderCondition
0..∞
Field No. 17
ait1::orderStatus
1..∞
Field No. 18
ait1::biddingId
Field No. 44
ait1::minimumExecuteVolume
Field No. 19
ait1::triggerDetails
Field No. 20
ait1::orderDuration
Filed No. 22
ait1::originalEntryTime
ait1::linkedOrderId
0..∞
Field No. 40
ait1::priceOrPriceFormula
Field No. 45, 46 and 49
ait1::fixingIndex
0..∞
Field No. 27 - 31 and 48
ait1::notionalAmountDetails
Field No 50 and 52
ait1::quantity

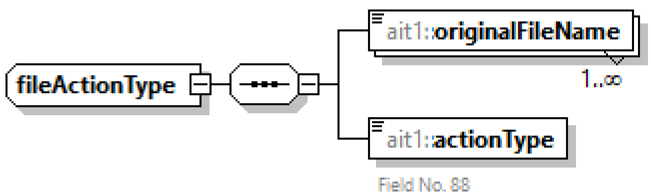


Generated by XMLSpy www.altova.com



Generated by XMLSpy www.altova.com

Proposed structure of the fileActionType type:



Generated by XMLSpy www.altova.com

Schema attributes:

```
<xs:complexType name="annexTable1Order">
    <xs:sequence>
```

```xml
            <xs:element name="RecordSeqNumber" type="ait1:RecordSeqNumberType"/>
            <xs:element name="idOfMarketParticipant" type="ait1:participantType1">
                <xs:annotation>
                    <xs:documentation>Field No. 1, Field No. 2 </xs:documentation>
                </xs:annotation>
            </xs:element>
            <xs:element name="orderId" type="ait1:orderIdType">
                <xs:annotation>
                    <xs:documentation>Field No. 15</xs:documentation>
                </xs:annotation>
            </xs:element>
            <xs:element name="buySellIndicator" type="ait1:buySellIndicatorType">
                <xs:annotation>
                    <xs:documentation>Field No. 13</xs:documentation>
                </xs:annotation>
            </xs:element>
            <xs:element name="organisedMarketPlaceIdentifier" type="ait1:organisedMarketPlaceType">
                <xs:annotation>
                    <xs:documentation>Field No. 33</xs:documentation>
                </xs:annotation>
            </xs:element>
            <xs:element name="transactionTime" type="ait1:dateTimeRestriction">
                <xs:annotation>
                    <xs:documentation>Field No. 37</xs:documentation>
                </xs:annotation>
            </xs:element>
            <xs:element name="contractInfo" type="ait1:contractInfoType"/>
            <xs:choice>
                <xs:element name="fullRecordData" type="ait1:fullOrderRecordDataType"/>
                <xs:element name="modRecordData" type="ait1:modOrderRecordDataType"/>
            </xs:choice>
        </xs:sequence>
    </xs:complexType>

    <xs:complexType name="fileActionType">
        <xs:sequence>
            <xs:element name="originalFileName" type="ait1:fileNameType" maxOccurs="unbounded"/>
            <xs:element name="actionType" type="ait1:actionTypesType" fixed="E">
                <xs:annotation>
                    <xs:documentation>Field No. 88</xs:documentation>
                </xs:annotation>
            </xs:element>
        </xs:sequence>
```

</xs:complexType>

* Do you agree with the proposed schema implementation of Action type field?
  - Agree
  - Do not agree
  - No opinion (selected)

Additional feedback

Please provide any additional feedback related to proposed revision of the reporting guidance and electronic formats under Table 1 or other elements not included in the survey. You may upload support materials.

On the Algorithm ID, Eurelectric welcomes ACER's effort to design the new Algorithm ID field without requiring a hardly achievable level of detail (e.g., such that a unique ID would be mapped to a unique combination of model parameters).
However, while we appreciate that the Guidance does not refer to the identification of "strategies", we still maintain concerns on the requirement of a prefix to derive the general purpose of the algorithm. Same as for the identification of algorithmic strategies, these concerns are primarily about proportionality, because identifying the purpose would not give valuable information for market oversight under Article 5a of REMIT II. But concerns are also about feasibility, as the purposes cannot always be distinguished in a clear-cut manner anyway. Fundamentally, algorithms are embedded in the Market Participants' processes without a clear-cut distinction between the categories that ACER is proposing in the TRUM (asset management, vs. risk management, or other options).
We therefore recommend a simple ID to identify the algorithm involved in a transaction with limited or no human intervention, to assist ACER in matching transactions with algorithms as needed without an ill-defined characterisation of the algorithm's purpose.

On liquidity provision, we take note of the introduction of this new reporting requirement in the IR through this new field in Table1 and draw attention to the fact that the notion of "liquidity provider" derives from a commercial practice involving a contractual agreement between a trader and an OMP to perform services related to market liquidity. This definition therefore depends on contractual arrangements with the OMP. It excludes broader liquidity providing behaviors (e.g. proprietary market making, informal activity).
In addition, we may consider that the proposed concept does not fully reflect the practical operation of wholesale energy trading. Liquidity provision is inherently context-dependent and may evolve according to market conditions. In many cases, it may not be possible to distinguish such activity in a clear and objective manner from ordinary proprietary trading undertaken on a participant's own account. As a result, the proposed field gives rise to a significant risk of inconsistent interpretation and misreporting.
If ACER requires the flagging of individual orders placed through the framework of a liquidity provision agreement, we strongly recommend that the relevant OMP should report this as it is responsible for reporting orders posted on its platform. OMPs are parties to the liquidity support agreements with traders and have all the relevant information to flag individual orders accordingly.
We therefore recommend amending the TRUM to clarify that this field (3) should be filled by OMPs when reporting orders as well as the field description: "The field identifies whether the order was submitted to the trading venue as part of a [liquidity service to this trading venue]"

Please upload your file(s) with the following naming convention: "[Name of the organization you represent]_REMITTable1".

End of survey

Contact

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ACER
European Union Agency for the Cooperation of Energy Regulators

ACER consultation: Revision of REMIT reporting (Table 2)

Fields marked with * are mandatory.

Respondent's data

* First and last name of the respondent:

Edoardo Tosoni

* Email Address:

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* Please select the type of organisation you represent:

- [x] Market Participant (MP)
- [ ] Organised Marketplace (OMP)
- [ ] Registered Reporting Mechanism (RRM)
- [ ] Association of Energy Market Participants (AEMP)
- [ ] Transmission System Operator (TSO)
- [ ] National Regulatory Authority (NRA)
- [ ] Other

* Name of organisation:

Eurelectric

* As an MP, you are involved in transactions related to:

(Select all that apply)

- [x] Electricity

- [ ] Natural gas
- [ ] Not applicable

* Please specify the country of registration:

- (x) EU-27
- ( ) Other country

* Please specify the EU Member State:

- ( ) Austria
- (x) Belgium
- ( ) Bulgaria
- ( ) Croatia
- ( ) Cyprus
- ( ) Czechia
- ( ) Denmark
- ( ) Estonia
- ( ) Finland
- ( ) France
- ( ) Germany
- ( ) Greece
- ( ) Hungary
- ( ) Ireland
- ( ) Italy
- ( ) Latvia
- ( ) Lithuania
- ( ) Luxembourg
- ( ) Malta
- ( ) Netherlands
- ( ) Poland
- ( ) Portugal
- ( ) Romania
- ( ) Slovak Republic
- ( ) Slovenia
- ( ) Spain
- ( ) Sweden

Confidentiality and data protection

By taking part in this survey you confirm to have read the Data Protection Notice on External Webinars / Online Events and the Data Protection Notice on Interactions with Stakeholders.

Introduction to the survey

Regulation (EU) No 1227/2011 of the European Parliament and of the Council on wholesale energy market integrity and transparency (REMIT) establishes a framework to ensure the integrity and transparency of wholesale energy markets across the Union.

In 2024, REMIT was revised, introducing new and updated data reporting requirements. These changes were further specified in Commission Implementing Regulation (EU) No 2026/256 (recast REMIT Implementing Regulation) which sets out detailed rules on data reporting obligations, market participant registration, inside information disclosure, and monitoring procedures to ensure consistent enforcement of REMIT across EU wholesale energy markets.

In light of this, ACER will amend the Transaction Reporting User Manual (TRUM) and the related electronic formats to reflect the updated REMIT reporting framework. This consultation is part of this update process and will feed into the final outcome with the objective to gather practical feedback on specific aspects of transaction reporting, including data field definitions, reporting structures and technical implementation, to support the update of the TRUM and the associated reporting formats.

Respondents are invited to provide their input based on their experience and expertise on the current market reality, reporting practices and systems.

The purpose of this survey is to gather feedback on proposed changes in relation to the reporting under Table 2 of the Annex to the recast REMIT Implementing Regulation for non-standard contracts. This survey is intended to be used for providing feedback on non-standard contracts to be reported on a continuous basis and non-standard contracts to be reported on a periodic basis pursuant to Article 3(a) and Article 4(2), respectively, of the recast REMIT Implementing Regulation.

The survey is organised in the following sections, in line with the Table 2 related requirements in the TRUM:

1. Chapter 2 on Supply contracts to be reported on a continuous basis (new)
2. Chapter 3 on Supply contracts to be reported on a periodic basis (new)
3. Chapter 7.2 on Contract details
4. Chapter 7.3 on Fixing index details
5. Chapter 7.4 on Option details
6. Chapter 7.5 on Delivery profile
7. Chapter 7.6 on Lifecycle information (Annex I to the TRUM)
8. Additional feedback

The consultation provides proposals for each regulatory novelty as follows:

- Overview of proposed new reporting guidance related to the change

- Implementation of the change in the new electronic format (schema)

Respondents have the possibility of providing feedback on any point not addressed in the survey in the section "Additional feedback" (8).

How to complete the survey:

In support of the survey, the following material is available to the respondent:

- Draft TRUM (v8.0)
- Draft Annex I to the TRUM on reporting lifecycle events
- XML schema definition (XSD) file containing the new electronic format.
- Excel file providing a comparison between the existing and the new formats, highlighting the changes being introduced, their rationale, the legal text from which the change is derived (where applicable) and the section of the survey where the change is featured.

Respondents are encouraged to read the TRUM (and annex) document provided and to consult both the XSD and the Excel file available while answering the questions in the survey to better understand the context and purpose of each change.

While the questions in section "Chapter 2 of the TRUM (New)" are structured for respondents to provide direct feedback on the TRUM sections covered in this chapter, the remaining questions of the survey are structured per data field. In each case, a question on the reporting guidance or on the electronic format (schema implementation) or both is foreseen at the end of the data field section. Respondents should select one of the three options available ("Agree", "Do not agree" and "No opinion"), complementing their answer with additional remarks where relevant. In case the option "Do not agree" is selected, additional remarks must be provided in order to advance to the next section.

Contact and deadline:

The contact point for this consultation is REMIT.Consultations@acer.europa.eu.

The deadline to reply to the consultation is 12/06/2026 17:00 (CET).

Supporting material

You may download here the relevant documents to support completing the survey.

TRUM (v8.0)

ACER_REMIT_TRUM_v8.0_DRAFT_v1_for_consultation.docx

Annex I to the TRUM

[ACER_REMIT_TRUM_ANNEX_I_v1.0_DRAFT_v1_for_consultation.docx]

Table 2 XSD

[draft1.0_REMITTable2_V3.xsd]

Excel model

[REMITTable2_V3_Model__Consultation_.xlsx]

Chapter 2 of the revised TRUM

The newly introduced Chapter 2 of the revised TRUM aims to provide reporting guidance on supply contracts reported on a continuous basis.

Respondents are invited to provide feedback on Chapter 2.2 describing the reporting requirements for non-standard contracts traded bilaterally by focusing on the key features of non-standard contracts and by addressing specific types of contracts such Power Purchase Agreements (PPAs) and LNG portfolio-type contracts. The draft revised guidance in this chapter is partially based on the currently available TRUM v7.0 and its Annexes, as well as the FAQs on REMIT transaction reporting (17th ed.).

Chapter 2.2. Reporting scenarios related to non-standard contracts

- [ ] Chapter 2.2.1. Features of a non-standard contract
- [x] Chapter 2.2.2. Power Purchase Agreements
- [ ] Chapter 2.2.3. LNG Portfolio-type contracts

2.2.2. Power Purchase Agreements

Overall, we welcome the balanced systematisation of data entry categories as it (i) facilitates implementation in automated systems (ii) without leaning towards the overstandardisation of nonstandard contracts which, especially in the case of PPAs, include a wide variety of bespoke agreements. With reference to the specific fields, we provide comments and recommendations for further improvement.

On the PPA definition, Eurelectric appreciates ACER's efforts to clarify when market participants have to report Table 2 transactions as PPAs by using (i) the legal definition under Art. 2(77) Regulation (EU) 2024/1747 with the addition of (ii) a set of criteria that may characterise PPAs such as: longer term delivery period; direct link to one or more generation plant(s); power generator or distributor as a seller; off-taker or distributor as a buyer; predefined commercial conditions.
An additional remark, however, is that such description of PPAs only focuses on the contractual relationship between a power generator and an off-taker (a customer, a supplier, etc.). But such contracts may also belong to more global contractual framework involving customers, aggregators and suppliers. It would therefore be good to provide clear guidance on what needs to be reported in these different situations.

Chapter 3 of the revised TRUM

The newly introduced Chapter 3 of the revised TRUM aims to provide reporting guidance on transactions relating to the supply or storage of electricity or the supply of natural gas to a single consumption unit with a technical capability to consume 600 GWh/year or more, unless concluded on an OMP.

Respondents are invited to provide feedback on the proposed reporting requirements for transactions reportable on a periodic basis in line with Article 4(2) of the recast REMIT Implementing Regulation.

Chapter 3 Supply contracts to be reported on a periodic basis

Chapter 7.2 Contract details

This section focuses on the changes introduced to the transaction reporting regime in the following fields:

- Data Field (12) Contract type
- Data Field (14) Linked transaction ID
- Data Field (15) Type of generation asset
- Data Field (16) Underlying mechanisms
- Data Field (17) Type of Power Purchase Agreement (PPA)
- Data Field (18) Delivery terms
- Data Field (19) Price or price formula
- Data Field (20) Notional amount
- Data Field (21) Notional currency
- Data Field (22) Annual contracted volume
- Data Field (23) Total notional contract quantity

Data Field (12) Contract type

Reporting guidance:

The data field identifies the type of contract that is reported in Table 2 as a non-standard contract. In the revised draft guidance, Value ‘OT’ for 'Other' is proposed to be deleted under this field. If disagreeing with the proposal, respondents are invited to provide feedback on use cases when none of the accepted values listed for Data Field (12) would be considered applicable, hence, value 'OT' for 'Other' needs to be reported in this field.

* Do you agree with the proposed cancellation of value 'OT' in Data Field (12)?

- Agree
- Don't agree
- (x) No opinion

Electronic format:

The implementation of the contractType field has not changed in the new schema. The field remains a stand alone, mandatory field.

```
<xs:element name="contractType" type="ait2:contractTypeType">
    <xs:annotation>
      <xs:documentation>Field No. 12</xs:documentation>
    </xs:annotation>
</xs:element>
```

Data Field (14) Linked transaction ID (NEW)

Reporting guidance:

The newly introduced Data Field (14) identifies the linked transaction that is associated to the reported bilateral contract. The proposed guidance aims to clarify the (non-exhaustive) list of scenarios when the linked transaction ID is considered applicable.

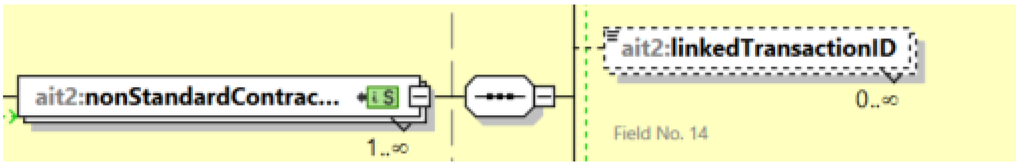
* Do you agree with the proposed reporting guidance for Data Field (14)?

- Agree
- (x) Don't agree
- No opinion

Please explain (optional)

As a general remark, the rationale of this new field is not entirely clear. The definition of “link between contracts” is not precise enough to be implemented. If two operations are linked, most of the time they occur in the same contract and then they are already linked in the actual REMIT reporting framework.
We would also like to underline that a specific field already exists to identify executions that is associated with a specific contract (field 32).
We have reservations about the proposed “Linked transaction ID” requirement in its current form, because the linkage appears operationally complex for bilateral and non-standard contract reporting. In principle, we understand the supervisory objective of linking economically related contracts. However, in practice, the proposed approach risks creating a reporting obligation that is highly complex to implement, difficult to operationalise consistently across counterparties, and potentially disproportionate to the incremental surveillance benefit.
In particular, the field appears to require reporting parties to identify and maintain linkages across multiple scenarios such as multi-leg option/spread/swap strategies, bundled corporate PPAs, sleeved structures and mirrored buy/sell legs. For complex structures, this may involve multiple cross-references, changing identifiers over time, and dependencies on information that may not be available, aligned or static at the point of reporting. This creates a material risk of inconsistent population, broken linkages and increased reconciliation issues between counterparties.
Our concern is therefore that the field may reduce data quality rather than improving it, because firms may be required to populate a linkage in circumstances where the relationship is commercially clear but operationally difficult to codify in a standardised, reportable way.

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional repeatable field to improve the data collection for PPA contracts, signaling the generation asset responsible for producing the energy

```
<xs:element name="linkedTransactionID" type="ait2:uniqueTransactionIdentifierType" minOccurs="0" maxOccurs="unbounded">
    <xs:annotation>
        <xs:documentation>Field No. 14</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Linked transaction ID?

- ○ Agree
- ○ Don't agree
- ● No opinion

Data Field (15) Type of generation asset (NEW)

Reporting guidance:

The newly introduced Data Field (15) is applicable to Power Purchase Agreements (PPA) identifying the underlying generation asset that is responsible for producing the energy to be delivered. The proposed guidance aims to define the list of accepted values applicable for this field.

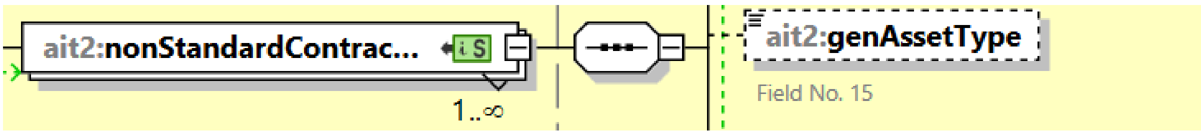
* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (15)?

- ( ) Agree
- (•) Don't agree
- ( ) No opinion

* If not agreed, please provide an alternative:

> We recommend including an “Other” category (similarly to Data Field 17) to ensure market participants can always find a category for entering their PPA, without undermining their compliance.

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional field to improve the data collection for PPA contracts, signaling the generation asset responsible for producing the energy

```
<xs:element name="genAssetType" type="ait2:typeGenAssetType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 15</xs:documentation>
    </xs:annotation>
</xs:element>

<xs:simpleType name="typeGenAssetType">
    <xs:restriction base="xs:string">
        <xs:enumeration value="SLR"/>
        <xs:enumeration value="HDR"/>
        <xs:enumeration value="ONW"/>
        <xs:enumeration value="OFW"/>
        <xs:enumeration value="BIM"/>
        <xs:enumeration value="NUC"/>
        <xs:enumeration value="FOS"/>
```

<xs:enumeration value="PFL"/>
<xs:enumeration value="HRE"/>
</xs:restriction>
</xs:simpleType>

* Do you agree with the overall schema structure for the Type of generation asset?

- ( ) Agree
- ( ) Don't agree
- (•) No opinion

Data Field (16) Underlying mechanisms (NEW)

Reporting guidance:

The newly introduced Data Field (16) identifies the mechanism or schemes impacting the formation of the contract. The field is considered particularly applicable for PPAs that may benefit from specific regulatory, financial, or certification schemes. The proposed guidance aims to define the list of accepted values applicable for this field.

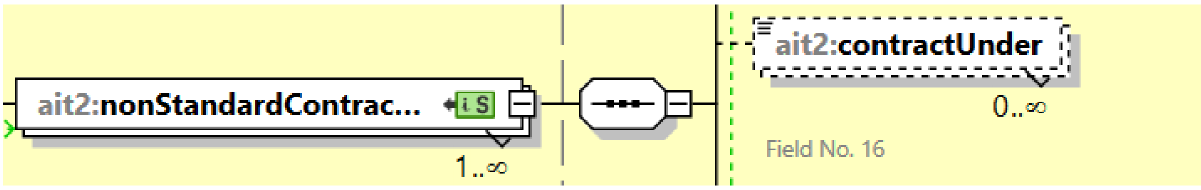
* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (16)?

- ( ) Agree
- (•) Don't agree
- ( ) No opinion

* If not agreed, please provide an alternative:

> As a general comment on underlying mechanisms, the relevance of this field for market surveillance is not fully evident. Further examples would help understand the exact aim of this field, and what should be reported. For example, it is unclear why this information should be recorded only for PPAs whereas governmental subsidies also apply to other activities in the energy sector.
> It should also be clarified whether the underlying mechanisms refer to the asset (e.g., the asset receives GOs when producing) or the contract (e.g., GOs are part of the contract being reported). GO definitions should also clarify the requirements when GOs are sold at different times than power but end up to the same consumer.
> From the operational standpoint, the information to be entered in this field should remain simple enough to avoid excessive operational burden for collecting underlying mechanism details from counterparties (which may cause delays). It is also advised to ensure the maximum entry length in Data Field (16) enables entering multiple coexisting mechanisms, where applicable.

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional repeatable field to improve the data collection for PPA contracts, signaling the mechanism impacting the formation of the contract.

```
<xs:element name="contractUnder" type="ait2:contractUnderlyingType" minOccurs="0" maxOccurs="
unbounded">
    <xs:annotation>
        <xs:documentation>Field No. 16</xs:documentation>
    </xs:annotation>
</xs:element>

<xs:simpleType name="contractUnderlyingType">
    <xs:restriction base="xs:string">
        <xs:enumeration value="SUB"/>
        <xs:enumeration value="REL"/>
        <xs:enumeration value="GOO"/>
    </xs:restriction>
</xs:simpleType>
```

* Do you agree with the overall schema structure for the Underlying mechanisms?

- ○ Agree
- ○ Don't agree
- ◉ No opinion

Data Field (17) Type of Power Purchase Agreement (PPA) (NEW)

<u>Reporting guidance:</u>

The newly introduced Data Field (17) identifies the contractual structure of a PPA by specifying how the electricity delivery and the related payments are structured. The proposed guidance aims to define the list of accepted values applicable for this field.

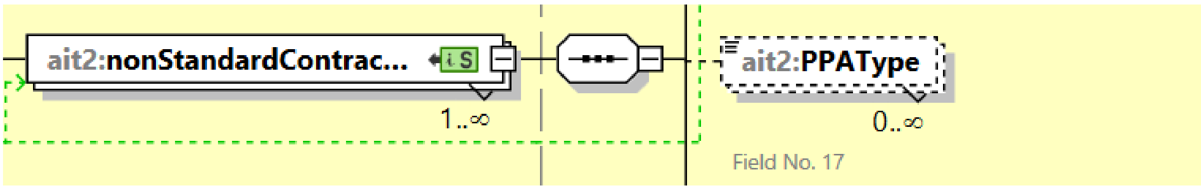
* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (17)?

- ○ Agree
- ◉ Don't agree
- ○ No opinion

* If not agreed, please provide an alternative:

> In principle, we would not see a need for this field, which may bring reporting complexity while most likely not covering the wide variety of possible contractual arrangements.
> To cope with this variety, it is crucial to maintain the the “Other” category, to ensure the exhaustiveness of the list without undermining the compliance of market participants.

<u>Electronic format:</u>



New field in the legal text of the recast REMIT IR, implemented as an optional repeatable field to improve the data collection for PPA contracts, signaling the contractual structure of the PPA.

```
<xs:element name="PPAType" type="ait2:PPATypeType" minOccurs="0" maxOccurs="unbounded">
    <xs:annotation>
        <xs:documentation>Field No. 17</xs:documentation>
    </xs:annotation>
</xs:element>

<xs:simpleType name="PPATypeType">
    <xs:restriction base="xs:string">
        <xs:enumeration value="PN"/>
        <xs:enumeration value="PC"/>
        <xs:enumeration value="BL"/>
        <xs:enumeration value="PP"/>
        <xs:enumeration value="PF"/>
        <xs:enumeration value="FH"/>
        <xs:enumeration value="DP"/>
        <xs:enumeration value="OT"/>
    </xs:restriction>
</xs:simpleType>
```

* Do you agree with the overall schema structure for the Type of Power Purchase Agreement (PPA)?

- ○ Agree
- ○ Don't agree
- ◉ No opinion

Data Field (18) Delivery terms (NEW)

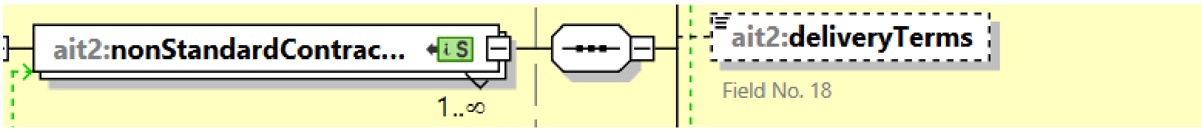
Reporting guidance:

The newly introduced Data Field (18) is applicable for contracts for the supply of LNG (typically LNG portfolio type contracts as described in TRUM chapter 2.2.3), and it shall identify the terms of the delivery as specified in the contract by referring to the respective Incoterms. The proposed guidance aims to define the list of accepted values applicable for this field.

* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (18)?

- [ ] Agree
- [ ] Don't agree
- [x] No opinion

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional field to improve the data collection for LNG contracts, signaling the terms of delivery.

```
<xs:element name="deliveryTerms" type="ait2:deliveryTermsType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 18</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Delivery terms?

- [ ] Agree
- [ ] Don't agree
- [x] No opinion

Data Field (19) Price or price formula

Reporting guidance:

The data field identifies the agreed price per unit of energy. If the contract includes a price formula the formula shall be reported in this field. The proposed reporting guidance aims to clarify how to report complex price formulas under Data Field (19).

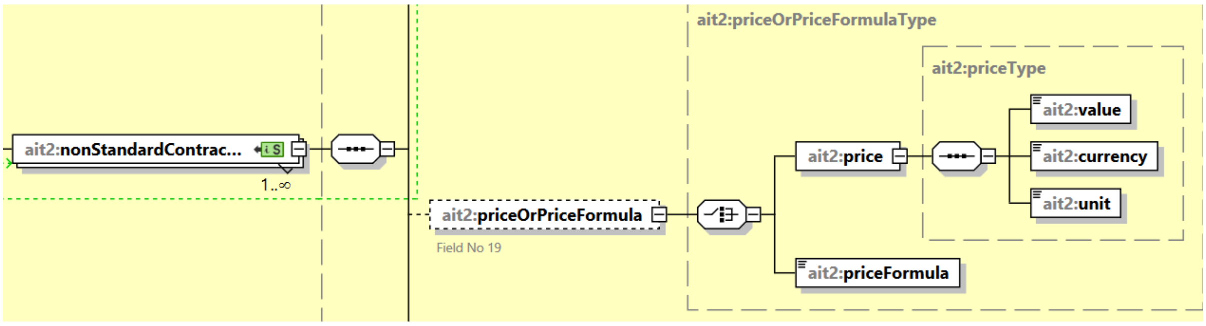
* Do you agree with the proposed reporting guidance for Data Field (19)?

- [ ] Agree
- [x] Don't agree
- [ ] No opinion

* If not agreed, please provide an alternative:

We welcome that ACER has kept this entry as free-text for price formulas (though possibly the admitted length could be incresed from 1,000 characters to avoid practical challenges even in slightly complex cases, e.g., a three-year contract with a different price formula each year).
It would also be useful to explore possibilities to provide ACER's validation tools, without which firms might need to build costly internal solutions. Even reporting deadlines may be at risk if formula validation becomes manual (leading to non-compliance and penalties).
Additional complexity due to multiple PPAs across jurisdictions should also be avoided.

Electronic format:



Optional field present in the existing Table 2 format and with the only change of the expansion of the priceType complex type (also included in optionStrikePrice and notionalAmount) to include the quantityUnitType subfield to improve the price reporting details.

```
<xs:element name="priceOrPriceFormula" type="ait2:priceOrPriceFormulaType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No 19</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Price or price formula?

- [ ] Agree
- [ ] Don't agree
- [x] No opinion

Data Field (20) Notional amount

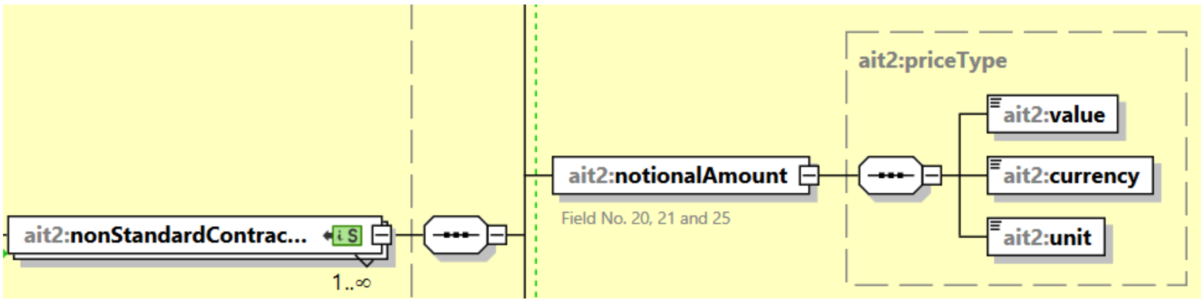
Reporting guidance:

The data field identifies the notional amount of the contract. The revised guidance requirements propose to report always an estimation in this field if there is no outright price.

* Do you agree with the proposed reporting guidance for Data Field (20)?

- Agree
- Don't agree
- No opinion

Electronic format:



Optional field in the existing Table 2 format, reimplemented as a mandatory field with the expansion of the priceType complex type (also included in optionStrikePrice and priceOrPriceFormula) to include the quantityUnitType subfield to improve the price reporting details.

```
<xs:element name="notionalAmount" type="ait2:priceType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 20, 21 and 25</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Notional amount?

- Agree
- Don't agree
- No opinion

Data Field (21) Notional currency

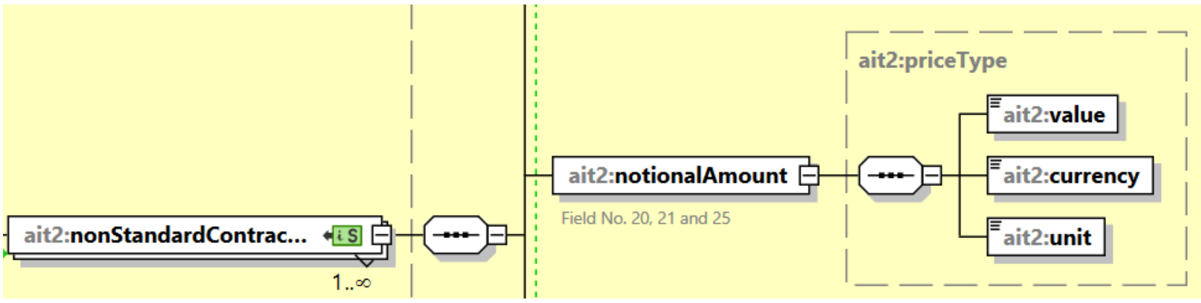
Reporting guidance:

The data field identifies the currency for the notional value of the contract. The revised list of currencies proposes to introduce Turkish lira.

* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (21)?

- Agree
- Don't agree
- No opinion (selected)

Electronic format:



Mandatory field present in the existing Table 2 format (also included in optionStrikePrice and notionalAmount), reimplemented with changes in the values, by the removal of outdated (BGN, HRK) and unused currencies (EUX, GBX, OTH), and introduction of the TRY currency.

```
<xs:element name="currency" type="ait2:currencyCodeType">
    <xs:annotation>
        <xs:documentation>Currency Value</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Notional currency?

- Agree
- Don't agree
- No opinion (selected)

* Do you agree with the proposed allowed values for the reporting of the Notional currency? (removal of values “OTH”, "BGN", "GBX", "EUX", “HRK”, and addition of “TRY”)

- Agree
- Don't agree
- No opinion (selected)

Data Field (22) Annual contracted volume (NEW)

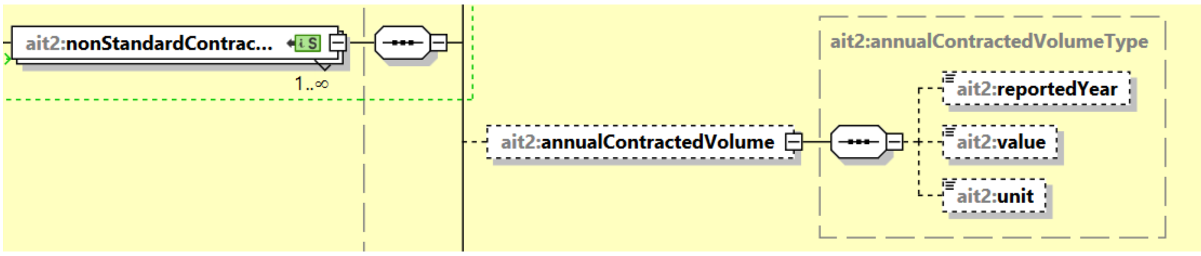
Reporting guidance:

The newly introduced Data Field (22) indicates the annual contracted volume as agreed between the counterparties for the total amount of energy to be delivered in the next calendar year under the framework of the bilateral contract reported already in Table 2. The proposed reporting guidance indicates that the annual contracted volumes are typically agreed as part of the Annual Delivery Programmes related to LNG portfolio-type contracts.

* Do you agree with the proposed reporting guidance for Data Field (22)?

- ○ Agree
- ○ Don't agree
- ● No opinion

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional field to improve the data collection for LNG contracts, signaling the annual contracted volume, its unit, and the year of reference.

<xs:element name="annualContractedVolume" type="ait2:annualContractedVolumeType" minOccurs="0"/>

* Do you agree with the overall schema structure for the Annual contracted volume?

- ○ Agree
- ○ Don't agree
- ● No opinion

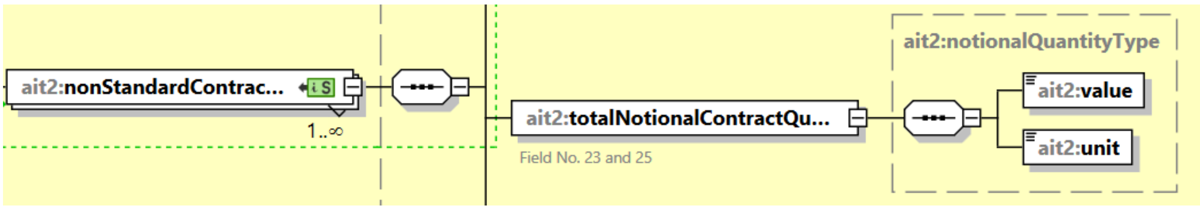
Data Field (23) Total notional contract quantity

Reporting guidance:

There are no changes foreseen in the reporting guidance for this field.

Other comments on Data Field (23) (optional)

Electronic format:



Optional field in the existing Table 2 format, reimplemented as a mandatory field.

```
<xs:element name="totalNotionalContractQuantity" type="ait2:notionalQuantityType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 18</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Total Notional Contract Quantity?

- Agree
- Don't agree
- No opinion

Chapter 7.3 Fixing index details

This section focuses on the changes introduced to the transaction reporting regime in the following field:

- Data Field (36) Settlement method

Data Field (36) Settlement method

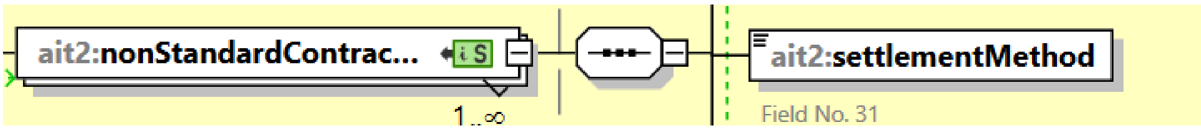
Reporting guidance:

The data field identifies the type of settlement for the bilateral contract. The revised list of accepted values intend to reflect the type of settlement method and whether the parties had an option over the settlement method.

* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (36)?

- Agree
- Don't agree
- No opinion

Electronic format:



Mandatory field in the existing Table 2 format, reimplemented with a split of the value "O" into "P_OP" and "C_OP" to improve the physical/cash optionality reporting data.

```
<xs:element name="settlementMethod" type="ait2:settlementMethodType" default="P">
    <xs:annotation>
        <xs:documentation>Field No. 31</xs:documentation>
    </xs:annotation>
</xs:element>

<xs:simpleType name="settlementMethodType">
    <xs:restriction base="xs:string">
        <xs:enumeration value="P"/>
        <xs:enumeration value="C"/>
        <xs:enumeration value="P_OP"/>
        <xs:enumeration value="C_OP"/>
    </xs:restriction>
</xs:simpleType>
```

* Do you agree with the overall schema structure for the Settlement method?

- ○ Agree
- ○ Don't agree
- ◉ No opinion

Chapter 7.4 Option details

<u>Reporting requirements:</u>

There are no changes foreseen in the reporting guidance for the data fields related to option details. Nevertheless, respondents are invited to provide feedback on the reporting of details of non-standard option contracts they propose to be revised / further clarified in the guidance.

Feedback on reporting option details (optional)

Chapter 7.5 Delivery profile

This section focuses on the changes introduced to the transaction reporting regime in the following field:

- Data Field (49) Number of periods
- Data Field (50) Load type

Data Field (49) Number of periods [NEW]

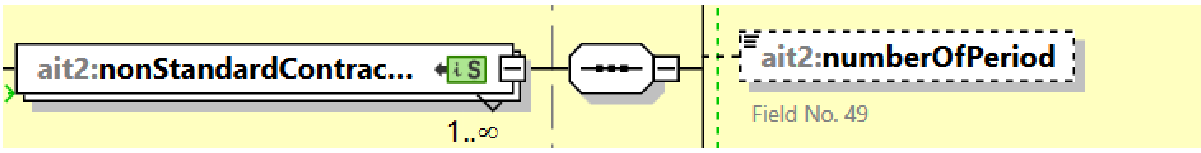
Reporting guidance:

The data field represents the calculated number of time units the quantity is delivered based on the delivery profile, using an hourly resolution. It reflects the total count of distinct hourly periods over which deliveries occur within the bilateral contract’s timeframe. This field is only applicable for non-standard contracts with a fixed delivery profile.

* Do you agree with the proposed reporting guidance for Data Field (49)?

- ○ Agree
- ○ Don't agree
- ◉ No opinion

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional field to improve the reporting of the delivery profile.

```
<xs:element name="numberOfPeriod" type="ait2:restrictedDecimal" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 49</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Number of periods?

- ○ Agree
- ○ Don't agree
- ◉ No opinion

Data Field (50) Load type

Reporting guidance:

The data field identifies the load type of the contract that is reported in Table 2 as a non-standard contract. In the revised draft guidance, Value ‘OT’ for 'Other' is proposed to be deleted under this field. If disagreeing with the proposal, respondents are invited to provide feedback on use cases when none of the accepted values listed for Data Field (50) would be considered applicable, hence, value 'OT' for 'Other' needs to be reported in this field.

* Do you agree with the proposed cancellation of value 'OT' in Data Field (50)?
  - Agree
  - Don't agree
  - No opinion (selected)

Electronic format:

The implementation of the loadType field has not changed in the new schema. The field remains a stand alone, optional field.

```
<xs:element name="loadType" type="ait2:contractloadType" minOccurs="0">
        <xs:annotation>
            <xs:documentation>Field No. 50</xs:documentation>
       </xs:annotation>
</xs:element>
```

Chapter 7.6 Lifecycle information

This section focuses on the guidance of Data Field (51) Action type as proposed in the revised Annex I to the TRUM in relation to lifecycle events of bilateral contracts.

Data Field (51) Action type

Reporting guidance:

For the proposed reporting guidance, please refer to the draft Annex I to the TRUM.

Respondents are requested to provide general feedback on reporting lifecycle events of bilateral contracts as described in Chapter 6 in the draft Annex I to the TRUM, by focusing on Chapter 6.2.3 on invalidating a wrongly submitted contract in particular.

* Do you agree with the proposed guidance described in Chapter 6.2.3 on Invalidating a wrongly submitted contract?

- ○ Agree
- ○ Don't agree
- ● No opinion

Electronic format:

The implementation of the actionType field has not changed in the new schema. The field remains a stand alone, mandatory field.

```
<xs:element name="actionType" type="ait2:actionTypesType">
    <xs:annotation>
        <xs:documentation>Field No. 51</xs:documentation>
    </xs:annotation>
</xs:element>
```

Additional feedback

Please provide any additional feedback related to proposed revision of the reporting guidance and electronic formats under Table 2 or other elements not included in the survey. You may upload support materials.

Please upload your file(s) using the following filename format: [Name of the organisation you represent]_REMIT T2

End of survey

Contact

REMIT.Consultations@acer.europa.eu

Exposure reporting

Scope

Chapter 2.2 states that only market participants obliged to report records of their transactions under Article 8 of REMIT can be subject to the obligation to report information about their exposures. Chapter 3.1 further defines the scope of position reporting by reference to the definition of wholesale energy products under Article 2(4)(a) and 2(4)(b) of REMIT.

Article 5(1)(b) of the Recast REMIT Implementing Regulation exempts from transaction reporting transactions relating to the physical delivery of electricity produced by a single production unit with a capacity equal to or less than 10 MW, or by production units with a combined capacity equal to or less than 10 MW, unless concluded on OMPs. It is unclear whether positions resulting from such exempt contracts, which qualify as wholesale energy products within the meaning of Article 2(4)(a) of REMIT but are not reportable transactions, should be included in the calculation of trading positions for exposure reporting purposes and, by extension, in the 600 GWh yearly threshold assessment.

This ambiguity has a practical consequence for market participants holding bilateral physical supply contracts with small producers below the 10 MW threshold. Including such positions would bring into the exposure reporting perimeter activity that is expressly excluded from transaction reporting, which appears inconsistent with the coupling logic established in Chapter 2.2.

We request that ACER clarify explicitly whether positions resulting from contracts exempt under Article 5(1)(b) of the Recast IR are in or out of scope for both the threshold assessment and the quarterly position report.

Moreover, it is clearly explained that day-ahead and intraday timeframes shall not be taken into consideration for the sake of position reporting. We suggest clarifying the same about balancing volumes, as forecasting imbalances over a 18-months horizon would also be impractical. We understand that ACER is in fact aiming to capture a different concept from the BRP, such as settings where Market Participants sell on market energy they have not produced but for which an agreement exists with a producer. These settings may cover very different situations, including sales for future deliveries, or feed in tariffs schemes.

In forecast reporting, consumption related to customers should include all types of customers, regardless of whether they resell power or not.

Derivative positions

We suggest that the terms “position” and “exposure” be clearly defined upfront and used consistently throughout the text. This is to avoid ambiguities when users follow the guidance on the derivatives and forecasts sides of exposure reporting.

As to “non-standard contracts that include flexibility, such as those with variable delivery options, it may be necessary to provide estimations on the traded volume when transposing it to the relevant 18-month delivery window”, we recommend ACER to accept the Market Participants’ own estimation methodologies.

Forecasts of production and consumption

Eurelectric welcomes that (i) REMIT IR recognises forecasts as a particular category of information that should not be part of regular reporting and that (ii) ACER acknowledges that forecasts are by nature uncertain and prone to frequent variability.

This notwithstanding, our concerns about the reporting of forecasts remain in spite of the addition of the “(at request)” tag to the data fields of the exposure-reporting template. In fact, our concerns have not been about the frequency of the reporting but more fundamentally about the unsuitability of using a template for forecasts.

Reporting a single-figure forecast would lead to inevitable ambiguity. This is already reflected by the multiple expressions of the Guidance (such as “best estimate” or “expectation”) which are either undefined or inherently steer towards an unwarranted statistical interpretation.

We understand that forecasts are not requested with a prescriptive hedge ratio in mind. Nevertheless, we find that mandating the reporting of a single figure out of a range of plausible values would disregard the firms’ risk-management choices by still presuming some kind of matching between physical forecasts and derivative positions.

As result, any single-figure forecast would be prone to severe misinterpretation risk, if not illustrated at the same time by an expert. We therefore recommend removing the forecast data fields from the exposure-report template, replacing them with a bilateral interlocution in which ACER (i) monitors the Market Participant’s derivative positions and (ii) in case of need for market surveillance, engages with the market participant for receiving tailored and circumstantiated explanations on the forecasts.

This bilateral interlocution would give Market Participants the chance to explain their forecasts in the first place, avoiding a cumbersome sequence of (1) ACER’s request and Market Participant provision of single-figure forecasts, (2) misinterpretation of the single-figure forecast, (3) request for clarification by ACER and methodology illustration by the

Market Participant (i.e., the collaborative approach would more simply and directly involve only step (3), when needed by ACER based on observation of the derivative positions).

As to the mode with which ACER may issue the forecast requests, it is very important to preserve confidentiality. We therefore strongly recommend approaching the selected Market Participants in a bilateral way through a formal confidential request, after duly informing the NRAs. The reasoning for the request should also be included. We are indeed concerned about any asymmetrical rules and practices as well as a lack of information regarding the reasons for and objectives of the request. The criteria and/or methodology used for selecting which Market Participants receive the ad hoc requests should be clarified and disclosed to all Market Participants. It is crucial to keep in mind the burden and complexity for Market Participants for such reporting.

We find that our recommendations properly reflect the upon-request nature of the forecasts under Art.6(4) of the recast REMIT IR by recognising that they are sensitive quantities, as opposed to treating them as simple determined information.

In addition to the above fundamental concerns on the request of forecasts, we note that the guidance further specifies, by reference to Chapter 2.3, that the cut-off date and 18-month delivery window applicable to position reporting shall equally apply to forecast estimates, meaning forecasts must reflect best estimates as of the last day of the relevant reference quarter.

However, the guidance does not clarify the temporal scope of such a request, specifically whether it may cover past reference quarters or applies to future quarters only. As the guidance itself acknowledges in Chapter 4, forecasts are best estimates based on information available at a given point in time and cannot be accurately reconstructed after the fact. Requiring market participants to provide historical forecasts for past reference quarters would therefore impose a continuous data storage obligation, in anticipation of a potential request, that is neither explicitly required nor proportionate given the ad-hoc nature of the reporting.

We therefore invite ACER to confirm that the forecast reporting obligation is prospective in nature, meaning that once a request is received, it applies to reference quarters following the date of the request, and not to past reference quarters. This approach would be consistent with the ad-hoc character of the obligation as set out in Chapter 4 and would avoid placing a burden on market participants that is not supported by the current text of the guidance.

Chapter 6 Feedback on lifecycle reporting

Chapter 6 and Data Field (16) indicate that correcting an erroneous exposure report requires both submission of a corrected report using Action type "E" and the opening of a contingency through the RRM. This two-step process is more burdensome than the approach established for REMIT transaction reporting, where corrected, cancelled or modified reports can be submitted directly through the RRM without additional formalities.

This added procedural layer may in practice discourage prompt voluntary correction. Therefore, we recommend that ACER align the correction process with the existing transaction reporting framework, allowing market participants to submit a corrected report directly via their RRM using Action type "E" without a separate contingency requirement. Where ACER considers a contingency procedure warranted, for example in cases of systemic or repeated errors, this could be provided for as an exception rather than a general rule.

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent a total of +3500 companies in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:
- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

WG Financial Regulation & Market Intregrity

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