eurelectric

Response to ACER preconsultation on REMIT Delegated Regulation Guidance - data validation principles and processes and the mechanisms to identify errors

Eurelectric consultation response paper

June 2026

Contribution ID: 517098af-75fd-4d9a-b245-4470d709d609
Date: 29/05/2026 15:09:19

Delegated Regulation Guidance - the data validation principles and processes and the mechanisms to identify errors

Fields marked with * are mandatory.

Respondent's info

* First and last name

Edoardo Tosoni

* Email address

etosoni@eurelectric.org

* What type(s) of organisation do you represent?

(Select all that apply)

- [x] Association of Energy Market Participants (AEMP)
- [ ] Inside Information Platform (IIP)
- [ ] Organised Marketplace (OMP)
- [ ] Registered Reporting Mechanism (RRM)

* Name of the organization you represent

Eurelectric

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

I confirm

Stakeholders' Feedback

Background information

Under Article 9 of the Delegated Regulation on the authorisation and supervision of IIPs and RRMs, ACER is required to issue a guidance document within seven months of the Regulation's entry into force.

The Delegated Regulation Guidance must be developed after consulting relevant stakeholders and should cover the following areas:

(a) the technical process for the testing phase as referred to in Article 5(1);
(b) the application process for already registered IIPs and RRMs as referred to in Article 8(1);
(c) **the data validation principles and processes as referred to in Article 12(1) and (2) by providing technical specifications for the verification of data;**
(d) the security measures referred to in Article 13(1), point (d);
(e) the format of the report on unplanned downtime or disruption as referred to in Article 18(3);
(f) the flagging process set out in Article 24(4), if applicable;
(g) t**he mechanisms to identify completeness, omissions and obvious errors in inside information reports and data records as referred to in Article 23(1) for IIPs and Article 27(1) for RRMs;**
(h) the format of the annual report as referred to in Article 33(1).

Objective of the pre-consultation

The aim of this targeted pre-consultation is to collect feedback from relevant stakeholders on the **Delegated Regulation Guidance - specifically on the data validation principles and processes, as well as on the chapter concerning the mechanisms to identify completeness, omissions and obvious errors**. This is intended to facilitate RRMs' and IIPs' compliance with the new or updated requirements and processes introduced by the Delegated Regulation on the authorisation and supervision of IIPs and RRMs, and to ensure the continuity, reliability, and integrity of data flows and reporting processes under the REMIT framework.

Stakeholders are invited to provide clear, reasoned and sufficiently detailed feedback, including practical examples where relevant, in order to enable the Agency to properly assess the comments and, where appropriate, reflect them in the final guidance.

The deadline to reply to the consultation is 29/05/2026 17:00 (CET).

Agency's proposal

Please find attached the draft Delegated Regulation Guidance chapters for consultation (the data validation principles and processes, as well as on the chapter concerning the mechanisms to identify errors.).

(Please note that the remaining chapters of the Delegated Regulation Guidance will be circulated for consultation over the coming months.)

_DRAFT__DA_Guidance_Validation_Completeness.docx

Please provide your feedback on the shared draft Delegated Regulation Guidance on the data validation principles and processes.

1. Data validation principles (Section 2.1)

As a general comment, validation requirements should primely focus on technical consistency, completeness and compliance with ACER specifications, without extending to substantive assessments of the content submitted by market participants.
In particular, it is important to clarify the notion of “reflecting the true information provided by the IIP or RRM client”. Especially to prevent this principle from increasing the requests from IIP/RRMs to market participants or, even more importantly, delaying the publication of inside information.

2. Pre-submission validation requirements (Section 2.2):

Completeness and data quality checks (Section 2.2.1)

These checks should not jeopardise the timely publication of the inside information submitted by market participants. Specifically, the goal should be to allow market participants to continue their operations without incurring REMIT breaches.
To this end, we recommend that IIP/RRMs (i) publish the inside information without modifying its content and without delay, (ii) subsequently perform the checks on data validation, asking for the needed changes always after publication without blocking it - as per REMIT DR Art.24(4) -, (iii) not establish a constant flow of requests from market participants in reaction to ACER’s updates of the validation rules. As to the last point (iii), automated notification systems should support efficient communication but should not create de facto real-time operational management obligations for market participants.

Data corruption detection (Section 2.2.2)

Authentication and identity verification (Section 2.2.3)

3. Handling invalid data prior to submission (Section 2.3)

Detection of invalid data (Section 2.3.1)

Overall, validation systems should not exceed the validation rules formally established by ACER and should remain operationally feasible, particularly for inside information publication.
It is also important to define a proper scope of what is intended by “incorrect data”, always to avoid the unwarranted delay of publication.
For example, values compliant with predefined technical parameters or accepted lists should not automatically be considered invalid due to potential substantive inconsistencies.
If “incorrect data” refers to the consistency checks for logical coherence, to avoid overburdening all parties involved with a potentially high number of checks, we suggest that sample checks carried out by ACER after submission would be more effective.

Data correction and client’s notification (Section 2.3.2)

Most importantly, we find the indication that “the IIP or RRM should inform the client that the data has not been reported to the Agency due to the identified error, and that this may result in a breach of Article 8 of REMIT” to go beyond the responsibility and authority of IIP/RRMs. The submission responsibility lies with market participants, who must remain free to submit the data they deem appropriate.
Otherwise, there would be an excessive risk of impeding the publication of inside information on the grounds of a simple misalignment of data fields with ACER’s requirements.
Hence, under REMIT DR Art.24(4), it is fundamental that market participants can always continue sending the data flows to IIP/RRMs. Specifically, IIPs should not block the publication of information even when further clarifications may be required from the IIP client.
Moreover, while automated notification systems can support efficient communication, it is important that real-time reporting by IIP/RRMs does not turn into inevitably complex real-time management activities for market participants.
Furthermore, the requirement that feedback from IIP/RRMs to their clients and resubmission of the corrected records from the latter to the former take place “within the specified timeframe set in the recast REMIT Implementing Regulation” would be operationally unachievable. It would indeed entail elaborating, submitting, verifying and correcting a vast amount of data. We therefore recommend that the verification and correction processes remain split from and not subject to reporting and publication timelines.

Register of invalid data (Section 2.3.3)

4. Post-submission processes and Agency interaction (Section 2.4)

Receipt handling (Section 2.4.1)

Error handling post-submission (Section 2.4.2)

It is important to note that the requirement of ten working days from the date of the receipt issuance by ACER for amending an error attributable to the IIP/RRM’s client would go beyond the legal REMIT provisions. Instead, timeframes for post-submission corrections should remain proportionate and operationally achievable, taking into account the complexity and volume of reported data. We therefore recommend that market participants are enabled to proceed with the corrections within reasonable, operationally feasible timeframes.
The automated notification scheme must design functionalities in the same systems used to publish inside information and to send data to RRMs.

Client notification systems (Section 2.4.3)

Correction of validated records with data quality issues (Section 2.4.4)

The notion of IIP/RRMs being “aware that the inside information record or data report is not compliant with the Agency’s manuals” raises questions as to the circumstances in which IIP/RRMs would in fact be aware of this type of noncompliance. Specifically, it is important to avoid any implication that IIP/RRMs would be responsible for verifying the factual correctness of the information provided by market participants. Any obligations imposed on IIP/RRMs should remain fully consistent with their technical intermediary role within the REMIT reporting framework. Validation obligations should remain proportionate and should not evolve into supervisory functions exceeding the technical role assigned to IIP/RRMs.

Please provide your feedback on the shared draft Delegated Regulation Guidance on the mechanisms to identify completeness, omissions and obvious errors.

1. Validation mechanisms (Section 3.1)

Technical data quality validation (Section 3.1.1)

Field level validation rules (Section 3.1.2)

It would be extremely useful to assess and discuss the detail of the validation rules in the “REMIT Validation Rules document” referred to in this Guidance. It would especially help understand the complexity of managing the validation process.
To this aim, it is important that ACER will communicate new validation rules and amendments at the earliest possible stage and ensure that the “REMIT Validation Rules document” is sufficiently detailed and transparent.

Monitoring and detection of missing data (Section 3.1.3)

Monitoring obligations based on historical reporting patterns should remain proportionate, not automatically triggering assumptions of irregularities. Hence, they should be limited to detecting significant anomalies, such as a complete absence of reporting like in the example provided by ACER.

2. Proportionality and consistency (Section 3.2).

General feedback on the draft Delegated Regulation Guidance

The proposed framework should remain aligned with the operational realities of REMIT data reporting and inside information publication, while ensuring a balanced allocation of responsibilities among market participants, RRMs and IIPs. IIP/RRMs should primarily be regarded as technical intermediaries responsible for the technical integrity, transmission and validation of data with respect to ACER specifications, whereas the substantive accuracy and regulatory qualification of the information remain under the responsibility of the market participant.
In consistency with this background, IIP/RRMs should not make any modification to the data submitted by market participants (without the consent of the market participant), or refuse publication and reporting where

the information complies with ACER technical specifications. From a market participant's perspective, the IIP user interface should reasonably tackle all technical validations as part of the submission process. As per REMIT DR Art.24(4), publication of inside information cannot under any circumstance be delayed by validation checks. Any verification or clarification process must occur after publication to safeguard market transparency and operational continuity. Validation obligations should remain proportionate and should not evolve into supervisory functions exceeding the technical role assigned to IIP/RRMs.
Validation systems should not exceed the validation rules formally established by ACER and should remain operationally feasible, particularly for inside information publication. Similarly, IIP/RRMs should not be expected to identify additional forms of noncompliance after records have successfully passed all mandatory validation checks and have been accepted by the Agency.

Contact

Contact Form

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 Integrity

Contact:
Edoardo TOSONI, Senior Advisor - Wholesale Markets –
etosoni@eurelectric.org

Dépôt legal: D/2026/12.105/26

Union of the Electricity Industry - Eurelectric aisbl
Boulevard de l'Impératrice, 66 – bte 2 - 1000 Brussels, Belgium
Tel: + 32 2 515 10 00 - VAT: BE 0462 679 112 • www.eurelectric.org
EU Transparency Register number: 4271427696-87