



# Stakeholder Consultation on MoP (Annex VII - Inside Information)

Fields marked with \* are mandatory.

## Respondent's data

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\* Name and Surname of the contact person

*50 character(s) maximum*

Octav Baci

\* Email Address

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\* Please select the stakeholder category you represent

- Association of Energy Market Participants (AEMP)/ Individual Market Participants
- Inside Information Platform (IIP)

\* Name of organisation / company

*50 character(s) maximum*

IOGP Europe

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## Objective of the consultation

The aim of this consultation is to collect feedback from relevant parties on the update of the REMIT Manual of Procedures on data reporting, specifically Annex VII (Data fields for inside information reporting), Annex VIII (XML Schema for Inside Information Reporting) and the FAQs on REMIT fundamental data and inside information collection.

## **Target Group**

The guidance is being consulted with relevant parties for the disclosure and publication of inside information, in line with the requirements of Article 10(3) of the REMIT Implementing Regulation.

The EU Agency for the Cooperation of Energy Regulators (ACER) is consulting entities from the List of IIPs and AEMPs engaging in stakeholder activities for REMIT implementation.

## **Contact and Deadline**

The contact point for this consultation is [ana.tetuanblanco@acer.europa.eu](mailto:ana.tetuanblanco@acer.europa.eu).

The consultation will be open until 20 February 2026 17:00 (CET).

## **Background and scope of the consultation**

Article 10(3) of Commission Implementing Regulation (EU) No 1348/2014 stipulates that the Agency shall after consulting relevant parties establish procedures, standards and electronic formats based on established industry standards for reporting of information referred to in Articles 6, 8 and 9 of Commission Implementing Regulation (EU) No 1348/2014. Further to that, Article 10(1) specifies that market participants disclosing inside information shall provide web feeds in order to enable the Agency to collect this data efficiently. On this basis, in 2015 the Agency prepared the Manual of Procedures on transaction data, fundamental data and inside information reporting (MoP on data reporting).

Subsequently, the MoP has been revised multiple times. The present revision will result in publishing Version 10 of the MoP, specifically Annex VII and VIII, and Version 9 of the FAQ on REMIT fundamental data and inside information collection.

The update was brought about by an assessment of the level of harmonisation of the publication of inside information across different platforms and EU member states, undertaken by national regulatory authorities (NRAs) and ACER, with significant input from IIPs. The assessment identified key areas for improvement that the present update addresses.

The revision aims to clarify how to understand key terms of the guidance, update inside information reports and disclose overlapping unavailability events, and proposes a change in how the affected asset or unit is defined. The Agency elaborates on these updates individually below for convenience in responding to the consultation.

In total, there are six fields that are proposed to be updated. Specifically, to further clarify the existing guidance. At one instance, Field name (17) Affected asset or unit EIC code, there is also a proposal to change the cardinality and include an additional type of an EIC code.

## Implementation timeframe

Once the Agency receives and incorporates stakeholder feedback, it will publish the updated guidance documents.

Market participants and IIPs would then have 6 months after this publication to align their disclosure and publication mechanisms for inside information.

It is important to note that the ongoing revision of the REMIT secondary legislation does not concern the present update and this consultation, which are solely based on Commission Implementing Regulation (EU) No 1348/2014.

## Relevant documents

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Download MoP version 10:

[ACER\\_REMIT\\_MoP\\_on\\_data\\_reporting\\_V10\\_-\\_clean.docx](#)

Download MoP version 9 and 10 compared:

[ACER\\_REMIT\\_MoP\\_on\\_data\\_reporting\\_V9\\_vs\\_V10.docx](#)

Download FAQ version:

[FAQs\\_on\\_REMIT\\_Fundamental\\_Data\\_and\\_Inside\\_Information\\_V9.zip](#)

Download proposed Annex VIII of the MoP:

[MoP\\_Annex\\_VIII\\_Inside\\_Information\\_Schema.zip](#)

## **Proposed revisions of the Manual of Procedures on Data Reporting (MoP) and FAQ on REMIT Fundamental Data and Inside Information collection (FAQ)**

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### **1. Data Field (1) Message ID**

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The updated text provides clarifications on key terms used across the reporting guidance.

In particular, the terms that have been defined and clarified are: UMM thread ID, Version number, Message ID and Event.

Additionally, a visualisation has been added to facilitate the interpretation of the different terms that are used throughout the guidance and corresponding FAQ.

\* Do you have any specific feedback regarding the definitions provided under Data Field (1) Message ID?

- Yes
- No
- No opinion

\* Does the visualisation help to understand how the terms are related, used and differ?

- Yes
- No
- The visualisation does not provide additional information and I don't see the need to include it in the guidance.

## 2. Data Field (2) Event Status and FAQ 5.1.3.

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The current guidance on Data Field No (2) Event Status, specifically on the use of the status "Dismissed", appears to be interpreted differently among stakeholders. The new version of the MoP proposes to clarify that the status "Dismissed" refers to an event not to be taken into account anymore due to the fact that it was cancelled or withdrawn.

The revision aims at re-enforcing guidance currently present in FAQ 5.1.3, namely the immutability of versions published in the past, to clarify that the "Dismissed" status refers to the event rather than the published version and that previously published UMM versions are not to be amended with a "Dismissed" status after updating the event.

\* Do the changes provide enough clarification and harmonisation on how the term "Dismissed" in Field number (2) Event Status is used?

- Yes
- No
- No opinion

\* Please provide your feedback and suggestions (if any).

We consider that the proposed modification concerning the use of the term "Dismissed" does not enhance market transparency or integrity, and instead it ultimately increases the level of complexity for users when reviewing and interpreting unavailability information. To maintain clarity in published messages and ensure full transparency and market integrity, it is essential that only messages that have not been superseded and remain

valid are classified as “Active”.

Furthermore, the MoP should explicitly specify that the status change from “Active” to “Inactive” upon the event’s conclusion or expiry must occur automatically on the IIP side.

### 3. Data Field (3) Type of unavailability

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For gas unavailability events, the revised guidance text aims to clarify that the way market participants define the type of unavailability when disclosing UMM is without prejudice to the obligations set out in Gas Transparency Regulation (EU) 2024/1789.

The need for this clarification was raised by stakeholders who flagged a potential misinterpretation of how planned events are considered based on the definitions within the Gas Transparency Regulation 2024/1789 stipulating that planned interruptions shall be published at least 42 days in advance.

\* Do you have any specific feedback regarding the amendment of Data Field (3) Type of Unavailability?

- Yes
- No
- No opinion

\* Please indicate.

We acknowledge the aim of improving the differentiation between planned and unplanned events in line with the provisions of the Gas Transparency Regulation (EU) 2024/1789. To further strengthen alignment and support more consistent and accurate UMM submissions, we propose explicitly noting that unplanned events also cover situations triggered by adverse weather conditions.

From a gas market participant perspective, it is important to underline that the obligation under the Gas Transparency Regulation to publish planned interruptions at least 42 days in advance cannot be interpreted as an automatic or unconditional requirement for REMIT inside information disclosure with the same advance notice.

In practice, due to operational, contractual and organisational constraints, such advance notification is not always possible and, in certain cases, may even be restricted. We therefore support the clarification that the definition of the type of unavailability for REMIT purposes is without prejudice to obligations under the Gas Transparency Regulation.

### 4. Data Fields (9) Unavailable Capacity and (10) Available capacity, and FAQ 5.1.9.

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The additions to Data Field (10) Available capacity aim to clarify how to disclose overlapping events. The principles of how to disclose overlapping events are already part of the FAQ on Fundamental Data and Inside Information collection (Questions 5.1.9), and the proposed text includes direct references to this question, as

well as an elaborate example on how to report capacity values for overlapping unavailability events of the same electricity production asset. The example also explains that the value of Field (10) Available capacity of the most recent UMM - the one with the latest Publication Date and Time - can be used to determine the available capacity of the asset, in case of overlapping events.

For these reasons, the amended data fields are intended to highlight that:

- Data Field (9) Unavailable capacity refers to the capacity made unavailable by the event, with disregards to other events that may overlap.

- Data Field (10) Available capacity refers to the capacity of the facility that will not be affected, taking into account all events, i.e. the total capacity of the asset that will remain available.

\* Do you have any specific feedback regarding the definition of the data fields (9) Unavailable Capacity and (10) Available capacity?

- Yes, only for Data Field (9) Unavailable Capacity.
- Yes, only for Data Field (10) Available Capacity.
- Yes, for both Data Field (9) Unavailable Capacity and (10) Available Capacity.
- No

\* Provide your feedback

Within the gas schema, we believe that situations involving partially overlapping unavailability events require a degree of granularity that could be granted by the introduction of time-interval segmentation. The example provided in FAQ 5.1.9, representing the unavailability as a constant 40 MW from 11:00 to 13:00 would not reflect the real sequence of events. Instead, the correct disclosure should indicate 40 MW from 11:00 to 12:00 and 30 MW from 12:00 to 13:00, thereby offering a transparent and precise depiction of the overlapping impacts.

Furthermore, please note that the "Remarks" field cannot be automatically processed; therefore, its use should remain limited. Free-text descriptions should not be relied upon to convey information that is more appropriately captured through structured data fields.

\* Does the example provide enough clarification on how to report overlapping unavailability electricity events?

- Yes
- No
- No opinion

If you have any other concerns related to overlapping that may have not been taken into account, please raise them here.

## **5. Data Field (17) Affected Asset or Unit EIC Code and FAQ 4.1.14.**

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These two changes are the only ones that have an impact in the electronic format and therefore require an update of Annex VIII:

- The EIC code of the affected asset is proposed to be made mandatory, in line with the name that is already mandatory. The code allows for better precision in identifying the asset. The initial design of the format did not consider this as mandatory in order to allow market participants time to obtain codes for assets whose unavailability would constitute inside information (please see Question 4.1.14. in the FAQ that was also amended in line with this change).
- Allowing A-type EICs: Substations (coded with type A EIC) are a valid type of EIC defined by ENTSO-E definitions of EIC functions, applied for the Affected Asset or Unit EIC, that were previously restricted in both the guidance and electronic format of the field.

**Data Field Description**

No.	Field Identifier	Description	Applicability
17	Affected Asset or Unit EIC code	The EIC W, T, Z or <b>A</b> code of the resource object, timeline or measurement point.	<b>Mandatory</b>

\* Do you have any concerns on the applicability of the EIC of the affected asset or unit?

- Yes
- No
- No opinion

\* Please specify

We acknowledge the intention behind making the EIC a mandatory element in Inside Information disclosures, namely improving data consistency and supporting market analysis. However, we do consider that such an obligation would be counterproductive, as it could introduce practical barriers and undermine the timeliness and clarity of reporting.

The growing diversity of market assets makes a rigid EIC requirement unsuitable. As example, Non-standard physical assets, such as large-scale battery storage, industrial demand-response units, or specific grid components, which may lack an EIC or a straightforward process to obtain one. Another example is virtual or aggregated assets, especially demand-response portfolios, which do not correspond to a single physical EIC. Imposing one would prevent these resources from being properly reported, reducing transparency for the market.

Moreover, under REMIT Article 4, inside information may be published by entities other than the direct asset operator, including parent companies. In complex corporate groups, these units may not have immediate access to the asset's EIC, particularly in urgent situations. Requiring the code could therefore delay disclosures, running against the principle of prompt publication.

To be considered also that in many cases, the mandatory Market Participant name already ensures a sufficiently clear identification of the affected asset.

A mandatory EIC also does not work for inside information relating to new or not-yet-commissioned facilities. During early development stages, the asset is only a project and cannot have an assigned EIC, making the requirement of publication of intermediate steps unfeasible.

## Data protection

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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 on ACER's website and in [ACER's data protection notice](#).

## End of the Survey

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## Contact

[Contact Form](#)

