



Targeted consultation on assessing the usefulness of ISO 20022 standard for REMIT Exposure data reporting

Fields marked with * are mandatory.

Respondent's data

* Name and Surname of the contact person

50 character(s) maximum

Octav Baci

* Email Address

oba@iogp.org

* Please select the Stakeholder you represent

- Market Participant (MP)
- Registered Reporting Mechanism (RRM)
- Transmission System Operator (TSO)
- Distribution System Operator (DSO)
- Storage System Operator (SSO)
- LNG System Operator (LSO)
- Other type of organisation (please specify)

* Please specify "Other type of organisation"

AEMP

* Name of organisation / company

50 character(s) maximum

IOGP Europe

* Country where the organisation/company has its registered address

- EU-27
- Other country

* Please specify the EU Member State

- Austria
- 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

Objective

The aim of this Public Consultation is to collect feedback from all interested parties on the potential benefits of applying the ISO 20022 standard to the new Exposure XSD reporting format.

Target Group

Interested stakeholders, including but not limited to Market Participants (MPs), Registered Reporting Mechanisms (RRMs), Transmission System Operators (TSOs), Distribution System Operators (DSOs), Storage System Operators (SSOs), and LNG System Operators (LSOs).

Contact and Deadline

The contact point for this public consultation is remit@acer.europa.eu.

The Agency invites all interested stakeholders to provide comments to this Consultation Paper by 09/02/2026 17:00 (CET).

Background of Public Consultation

In 2024, the [revision](#) of [REMIT](#) (Regulation on Wholesale Energy Market Integrity and Transparency) introduced new data reporting requirements, including the obligation (under REMIT Article 8 "Data Collection") to report exposure data, which provides an indication of the market participants exposure to price movements in wholesale energy markets. In August 2025 the European Commission launched a [Public Consultation](#) on amending the already existent Implementing Regulation (EU) 1348/2014 on data reporting, which will set out further details on the framework for reporting data to Agency for the Cooperation of Energy Regulators (ACER).

While the Implementing Regulation is not yet adopted, ACER is seeking to consult at this early stage on the high-level design principles of the potential reporting format. In particular, as exposure data is a new and distinct reporting stream under REMIT, ACER will implement a new electronic template 'Exposure XSD' for its reporting, as set out in the revised REMIT and the recast REMIT Implementing Regulation.

Within this context, ACER is exploring whether a common framework for exchanging data, i.e. ISO 20022, could be applied to the 'Exposure XSD' reporting format, with the aim of making the reporting process simpler and more interoperable. As a new reporting stream, the Exposure XSD is as a suitable candidate that may benefit from the use of an existing standard. Thus, it is the only reporting format covered by this consultation, and no changes to existing REMIT reporting formats are being considered. Once the amended Implementing Regulation enters into force, further targeted consultations will follow on technical specifications and reporting guidance.

The harmonisation of reporting standards is also aligned with the pillars presented in the [EC's Affordable Energy Action Plan \(COM/2025/79\)](#) communicated as part of the [Clean Industrial Deal](#). The Affordable Energy

Action Plan highlights the need to enhance cooperation between national energy and financial regulators and between ACER and ESMA on data sharing.

Scope of this Consultation

ACER is exploring whether the 'ISO 20022 standard', a common framework for exchanging data, could be applied to the 'Exposure XSD' reporting format, with the aim of making the reporting process simpler and more interoperable. As a new reporting stream, the Exposure XSD is as a suitable candidate that may benefit from the use of an existing standard.

Stakeholders are invited to share their views on the potential benefits of applying the ISO 20022 standard to the Exposure XSD reporting format. Based on the input received, ACER will assess whether to proceed with adopting the ISO 20022 standard for the Exposure XSD electronic format.

Out of scope: Technical specifications and detailed guidance on how to report exposure data in line with the recast REMIT Implementing Regulation will be addressed in a separate consultation, to be launched after the recast Implementing Regulation is published in the Official Journal of the European Union.

Remarks

It is important to underline that the Exposure schema, while prepared following ISO 20022 principles, is not a formally registered ISO 20022 message and does not have regulatory status.

The schema shall maintain conceptual alignment with ISO 20022 through:

- the use of standard ISO-like simple data types (e.g. Max35Text, ISODateTime),
- adoption of the Document / Message Wrapper pattern,
- consistent application of ISO-aligned labelling (different approach than other current schemas that are more easily readable),
- reuse of ISO 20022 components and data type patterns wherever applicable.

Exposure - Overall Structure

In order to ensure consistency with existing ISO 20022 standards, several core data types and identifiers have been directly reused or adapted from the ISO 20022 data dictionary:

- Business Application Header (BAH) design principles reused for Document and GroupHeader1.
- Date and Time Types: ISODateTime, ISOMonthYear, aligned with ISO 20022 core type definitions.
- Identifier Types: EICIdentifier (based on ISO 20022 repository pattern for EIC codes), ACEIdentifier adapted for REMIT-specific participant codes. **To maintain cross-data harmonisation, the LEI code is also included.**

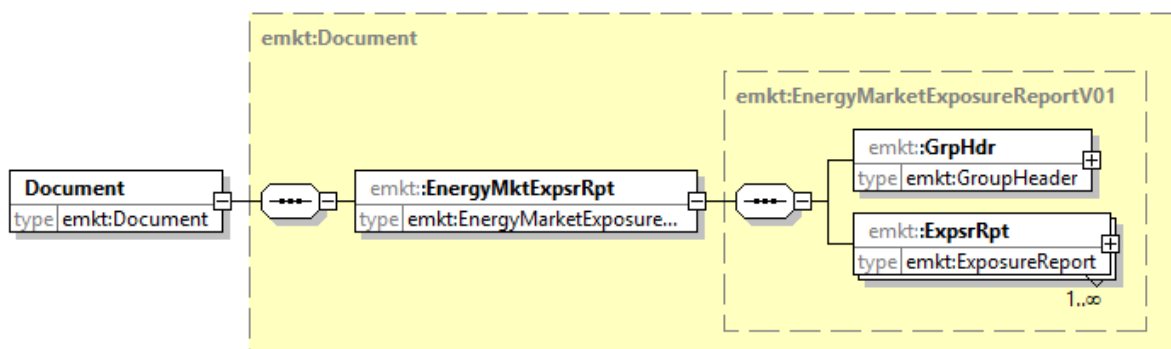
- Text Types: Max35Text, Max140Text, following the standard ISO 20022 length-restricted text structures.
- Unit of Measure: UnitOfMeasure10Code, created in line with ISO 20022 unit of measure codelist methodology.

The schema defines the message: EnergyMarketExposureReportV01, encapsulated within the root element Document, consistent with the ISO 20022 design pattern.

The message consists of two principal sections:

- GrpHdr (GroupHeader) - a standard header providing message-level metadata and identification,
- ExpsrRpt (ExposureReport) - a repeating section representing the exposure report for each market participant.

Each exposure report (ExposureReport) includes all reportable commodities for a given participant, represented by a list of Exposure Detail elements.



* Regarding the overall schema structure?

- Agree
- Don't agree
- No opinion

Respondents may use the space below to provide any additional remarks or observations they deem relevant.

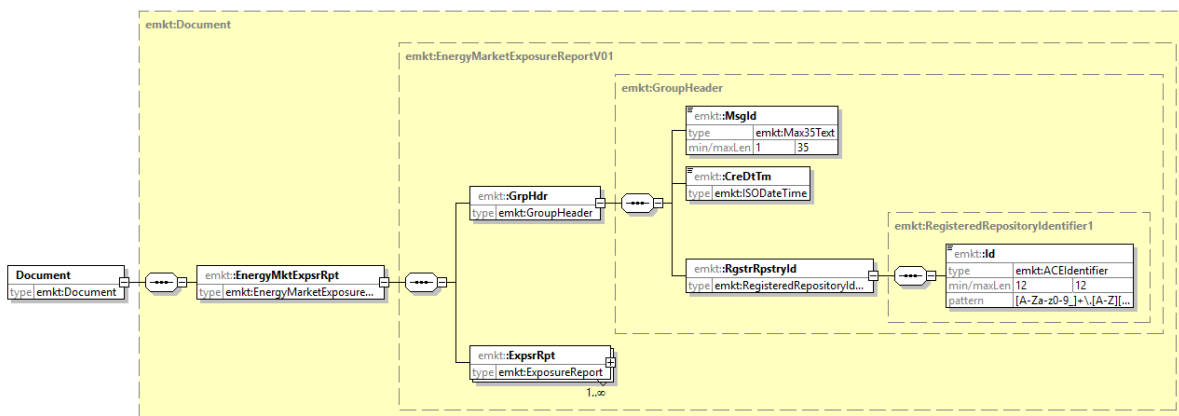
- We appreciate the confirmation that the formal registration of the ISO 20022 message will not be required. In case ISO 20022 registration needs will arise in the future, further analysis and an appropriate implementation timeline would be necessary.
- Although the Exposure schema is developed on “ISO 20022 like” approach it is therefore essential that all the needed information for successful data reporting activities are clearly documented in ACER’s documentation (the sole authoritative reference). The naming convention used should also be consistent with Exposure reporting requirements and REMIT language: GroupHeader should reflect a list of Market Participants rather than an actual set of group information at corporate level and “RgstrRptstryld” should refer to RRM in order to create unnecessary confusion.

Disclaimer: The example schema used for this consultation has been prepared based on the draft REMIT Implementing Regulation published for feedback by the European Commission in August 2025. Technical specifications and detailed guidance on how to report exposure data in line with the recast REMIT Implementing Regulation will be addressed in a separate consultation, to be launched after the recast Regulation is published in the Official Journal of the European Union.

EnergyMktExpsrRpt - Group Header (GrpHdr)

Aligned with the ISO 20022 Group Header component, this structure carries identification and creation metadata. It contains:

- MsgId (Max35Text) – unique identifier of the message,
- CreDtTm (ISODatetime) – creation timestamp,
- RgstrRpstryId (RegisteredRepositoryIdentifier) – identifier of the registered reporting repository (ACER code).



* Regarding the ISO format-related attributes of the "GrpHdr" field?

- Agree
- Don't agree
- No opinion

Respondents may use the space below to provide any additional remarks or observations they deem relevant.

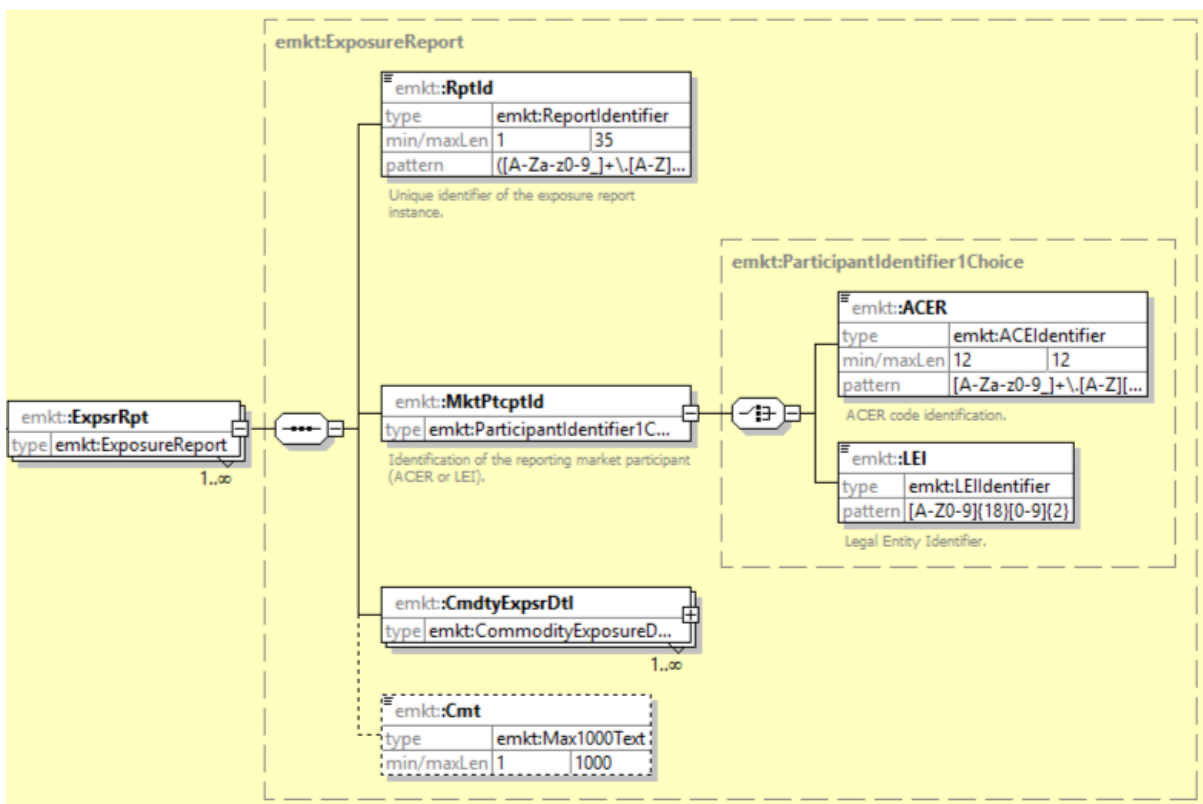
•Please refer to the comment already provided with reference to the Overall Structure for what concerns the needed consistencies with reference to GroupHeader and RgstrRpstryId fields.

Disclaimer: The example schema used for this consultation has been prepared based on the draft REMIT Implementing Regulation published for feedback by the European Commission in August 2025. Technical specifications and detailed guidance on how to report exposure data in line with the recast REMIT Implementing Regulation will be addressed in a separate consultation, to be launched after the recast Regulation is published in the Official Journal of the European Union.

EnergyMkrtExpsrRpt - Exposure Report (ExpsrRpt)

Represents the exposure report for a single market participant. It includes:

- RptId: Identifier of the Report.
- MktPtctId (ParticipantIdentifier1Choice) - unique identifier of the market participant. Can be provided as:
 - ACER (ACEIdentifier) - ACER code identifying the market participant,
 - LEI (LEIIdentifier) - optional Legal Entity Identifier.
- CmdtyExpsrDtl (Commodity Exposure Detail) - detailed breakdown of exposures, e.g. by commodity, delivery area, delivery month.
- Cmt (Max512Text) - comment for the report.



* Regarding the ISO format-related attributes of the "ExpsrRpt" field?

- Agree
- Don't agree
- No opinion

Respondents may use the space below to provide any additional remarks or observations they deem relevant.

• In line with present answer, we look forward to receiving from ACER fully comprehensive documentation, aligned with all elements needed for a successful data reporting.

Disclaimer: The example schema used for this consultation has been prepared based on the draft REMIT Implementing Regulation published for feedback by the European Commission in August 2025. Technical

specifications and detailed guidance on how to report exposure data in line with the recast REMIT Implementing Regulation will be addressed in a separate consultation, to be launched after the recast Regulation is published in the Official Journal of the European Union.

ISO 20022 Data Field Labelling

Do you agree with the overall adoption of standardized ISO 20022-aligned data field labelling for the reporting of the Exposure XSD electronic format (e.g. NrgyCmnty, DlvryMnth [ISOMonthYear], ActnTp)?

* Regarding the adoption of standardised ISO-aligned data field labelling?

- Agree
- Don't agree
- No opinion

Respondents may use the space below to provide any additional remarks or observations they deem relevant.

•As previously noted, while the Exposure schema has been designed “ISO 20022 like” it becomes material for ACER’s documentation to be clear and complete.

Final Remarks

* Overall, would you see merits in harmonising the electronic format of Exposure with ISO principles?

- Yes
- No
- No opinion

Respondents may use the space below to provide any additional remarks or observations they deem relevant.

* Based on your view would you identify any risks if this format is aligned to ISO principles?

- Yes
- No
- No opinion

Respondents may use the space below to provide any additional remarks or observations they deem relevant.

•As previously noted, while the Exposure schema has been designed “ISO 20022 like” it becomes material for ACER’s documentation to be clear and complete.

Confidentiality and data protection

Confidentiality

The Agency will make public the number of responses received in the scope of this public consultation, the names of the respondents (except those with a valid reason for not having their identity disclosed), and all non-confidential responses. The aggregated replies may form part of the publicly available document. Please indicate clearly in your response to this Public Consultation any part that you consider confidential and do not wish to have publicly disclosed including a valid reason.

* ACER evaluates and may publish the received input. Do you consent that the submitted input is published?

- Yes, ACER may publish the submitted replies and the name of my company
- Yes, ACER may publish the submitted replies anonymously
- No, ACER may not publish the submitted replies

* Does your submission contain confidential information?

- Yes
- No

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

ACER will not publish personal data.

End of the Survey

Contact

remit@acer.europa.eu

