



ACER consultation: Revision of REMIT reporting (Table 1 LNG and Annex III to the TRUM)

Fields marked with * are mandatory.

Respondent data:

* First and last name of the respondent:

Octav Baci

* Email address:

oba@iogp.org

* Please select the type of organisation you represent:

- 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:

IOGP Europe

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

- Electricity
- Natural gas

Not applicable

* Please specify the country of registration:

- EU-27
- Other country

* EU-27:

- 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

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 reporting LNG market and trade data.

The survey is organised in line with the sections of the draft Annex III to the TRUM and Table 1 of the Annex to the recast REMIT Implementing Regulation:

1. Chapter 2 on Reporting obligation
2. Chapter 3 on Type of LNG market data
3. Chapter 4.1 on Parties to the contract
4. Chapter 4.3 on Contract details
5. Chapter 4.4 on Transaction details
6. Chapter 4.5 on Details of LNG market and trade data
7. Chapter 4.6 on Optionality details
8. Chapter 4.7 on Delivery profile
9. Chapter 4.8 on Lifecycle information
10. 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" (10).

How to complete the survey:

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

- Draft Annex III to the TRUM on reporting LNG market and trade data
- XML Schema Definition (XSD) file containing the new electronic format
- Excel file 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 draft Annex III to the TRUM 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 the proposed implementation.

While the questions in sections "Chapter 2 on Reporting obligation" and "Chapter 3 on Type of LNG market data" are structured for respondents to provide direct feedback on the TRUM Annex III sections covered in these chapters, 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.

Draft Annex III to the TRUM on reporting LNG market and trade data

[ACER_REMIT_TRUM_ANNEX_III_v1.0_DRAFT_v1_for_consultation.docx](#)

XML Schema Definition (XSD) file containing the new electronic format

[draft1.0_REMITTable1LNG_V1.xsd](#)

Excel file 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

[REMITTable1LNG_V1_Model_Consultation.xlsx](#)

Chapter 2 Reporting obligation

Chapter 2 aims to describe the reporting obligations related to LNG market data.

Respondents are invited to provide feedback on the proposed guidance on the definition of LNG market data and the related reporting obligation with regard to:

- Lifecycle reporting
- Timing of reporting
- Reporting channel and format

Chapter 2 Reporting obligation

- 2.1. LNG market data
- 2.2. Lifecycle reporting of the LNG market data
- 2.3. Timing of reporting
- 2.4. Reporting channel and format

2.1 LNG market data

WORDING ISSUES:

Since these documents are designed to bring LNG Market Data within the REMIT reporting framework — previously governed by a separate structure — full terminological alignment with REMIT is a prerequisite for coherent and consistent implementation. Specific comments are provided below, but as a general observation, the language throughout should systematically reflect REMIT concepts, definitions, and structural logic.

A particular concern relates to the term "executions," which appears in two distinct regulatory contexts without adequate differentiation. This ambiguity stems from the document's dual scope, covering both the reporting obligation under Article 8 of REMIT and that under Article 3(a)(i) of the revised Commission Implementing Regulation. In the first context, "executions" refers to invoice executions — i.e. prices and quantities of non-standard Table 2 contracts under the standard REMIT reporting framework. In the second, the same term is used to denote firm delivery within LNG market data reporting based on long-term portfolio contracts.

To resolve this, we recommend that "execution" be reserved exclusively for the fixing of price and quantity as reflected in the invoice, while "cargo nomination" should be used to describe the determination of the cargo's delivery point into the EU. This distinction would prevent the conflation of commercial execution with operational nomination processes and ensure conceptual clarity throughout the document.

Additionally, having regard to the definition of "transaction" under Article 2(14) of the Implementing Regulation, we recommend replacing that term with "trades" wherever it has been used in the document in a manner inconsistent with that definition. This would eliminate a further source of interpretive ambiguity and ensure terminological consistency. Should ACER prefer an alternative formulation, any terminology that clearly distinguishes between the two concepts would be equally acceptable.

INCONSISTENCY IN THE EXAMPLE PROVIDED:

Finally, we have identified an inconsistency in the "Contract Date" field. In the XLS file

ANNEX_II_v6_LNG_DRAFT_v1, within sheet 5.02(c), the Contract Date, which, as the contract signing date, must remain unchanged, is incorrectly reported in the seller side column as 31/06/2027 instead of 31/06/2026.

2.3 Timing of reporting

GENERAL CONSIDERATIONS:

Now that LNG market data reporting is no longer linked to the urgency of the market correction mechanism, we believe the definition of "real-time" reporting warrants reconsideration. The current requirement places a disproportionate administrative burden on market participants, with adverse effects on data quality that are difficult to mitigate on a sustained basis.

In any case, could you please confirm that an LNG MP's is responsible to report real time to the RRM and not directly to ACER? It is important to keep in mind that an MP could not be liable for time failure of the RRM.

WORDING:

In Section 2.3 of the Guidance, in the second recital, the second bullet point states that LNG market data related to transactions shall be reported at the time when the "final agreement is reached between the counterparties, (confirmation) and not at the time when the transaction is formally signed (as this may take place several days or weeks after the counterparties mutually confirm the deal to each other)." In this regard, we would recommend the removal of the term "confirmation" from the text in the second bullet point, as in LNG business a "confirmation" is formally exchanged between counterparties only at the time of the formal signature (which typically occurs several time after the agreement).

2.4 Reporting channel and format

The document should make explicit, in all relevant sections, that the LNG Table 1 schema constitutes a departure from the standard Table 1 schema established under REMIT reporting obligations.

If we have understood correctly that Table 1 is to be split into two distinct tables — the existing standard table and a new LNG-specific one — we strongly recommend that all references throughout the document specify which Table 1 is being referred to, for example by adopting a consistent label such as "Table 1 LNG." This would prevent confusion and ensure that the distinction between the two schemas is unambiguous across all reporting contexts.

Chapter 3 Type of LNG market data

Chapter 3 of Annex III aims to provide guidance on the type of transactions to be considered as LNG market data and the related reporting requirements.

Respondents are invited to provide feedback on the proposed guidance with regard to the type of contracts typical for LNG trading, the reporting requirements related to multiple cargo transactions, the type of transactions excluded from the reporting, the scope of reportable LNG bids and offers, definitions of the delivery terms, and the described reporting scenarios.

Chapter 3 Type of LNG market data

- 3.1. Type of contracts typical for LNG trading
- 3.2. How to report multiple cargo transactions
- 3.3. Type of transactions excluded from the reporting of LNG market data
- 3.4. Scope of reportable LNG bids and offers
- 3.5. Delivery terms definition: DES vs FOB
- 3.6. Reporting scenarios

3.1 Type of contracts typical for LNG trading

We would welcome confirmation that in-tank transactions remain excluded from LNG market data reporting, consistently with the current guidance. Any references to in-tank transactions in the examples should be treated as drafting errors.

More broadly, the scope of LNG market data reporting appears to have been extended compared to the existing framework, without this being explicitly flagged. In-tank transactions, previously carved out from real-time reporting obligations, now appear to fall within the definition of spot transactions and would therefore become reportable. A similar issue arises for cargo swaps, which no longer feature among the transaction types explicitly excluded. Both points require clarification.

It is also unclear from the text whether LNG transactions executed on OMPs fall within the scope of LNG market data reporting. Several passages seem to suggest either that LNG transactions cannot be executed on OMPs, or that they are excluded from this framework. We consider this approach inconsistent with the general REMIT reporting architecture. Under Implementing Regulation (EU) 2026/256, where LNG activities are conducted on OMPs, reporting responsibility should rest with the OMP — as applies to other energy products. The guidance should confirm this explicitly.

Regarding Chapter 3.4, the inclusion of bids and offers submitted via OMPs within the LNG-specific reporting scope risks creating ambiguity. We request confirmation that such bids and offers are already captured by the general REMIT order book reporting obligations applicable to OMPs, and do not generate any additional or duplicative obligation for LNG market participants.

Finally, we question the continued inclusion of communications to entities influencing price formation within the scope of reportable bids and offers. If this provision is intended to refer to communications submitted to Price Reporting Agencies, we consider it inconsistent with the definition of bids and offers and with the concept of orders to trade more broadly. The regulatory framework for LNG benchmarks is built on real transaction data — a communication to a PRA does not constitute an order to trade, nor does it meet the requirement that only firm bids and offers are reportable. Within a harmonised REMIT reporting framework, this rationale no longer holds. If the underlying information is still considered necessary, we would suggest it be obtained directly from the relevant pricing agencies rather than through additional reporting obligations on LNG market participants.

3.3 Type of transactions excluded from the reporting of LNG market data

As a structural point, this section would be more logically placed at the beginning of the document, under Chapter 2. Moving it earlier would give the reader a clear picture of the applicable exclusions upfront, significantly improving the overall readability and flow of the guidance.

On substance, we would welcome examples clarifying what is meant by "transactions at virtual storages" and confirmation of whether this wording is intended to capture in-tank transactions in the Spanish market.

More broadly, the exclusion list as currently drafted appears to represent a narrowing of scope relative to the existing framework, without this being explicitly flagged. Transaction types that were previously carved out — most notably in-tank transactions and cargo swaps — no longer appear on the updated list and would therefore become reportable under the revised framework. We do not consider this to be an intended policy change, and we would ask that the exclusion list be reviewed accordingly.

In our view, the list should clearly identify all transaction types that are either already covered by general REMIT reporting obligations — including OMP order book reporting — or not intended to fall within LNG-specific reporting. This would eliminate duplication, prevent interpretative uncertainty, and ensure continuity with the current framework. A more explicit and comprehensive treatment of exclusions would be a straightforward improvement that significantly reduces the risk of unintended scope changes going unnoticed.

3.4 Scope of reportable LNG bids and offers

As noted under Section 3.1, bids and offers submitted via OMPs are already captured by the general REMIT order book reporting obligations applicable to OMPs. The inclusion of OMP-related bids and offers within the LNG-specific reporting scope under this section should not, in our view, create any additional or duplicative obligation for LNG market participants. Explicit confirmation of this from ACER would be welcome.

A related gap in the current drafting concerns LNG transactions actually concluded on OMPs, which do not appear to be covered by the table on page 6. While OMP-traded LNG volumes remain limited today, this is likely to change as market liquidity develops. We recommend that OMP orders either be incorporated into the table directly or, at minimum, that the text explicitly confirm that LNG transactions executed on OMPs fall within this reporting framework under the responsibility of the OMP — consistently with the general REMIT architecture.

On the reporting of bids and offers communicated to entities impacting price formation, clarification is needed as to whether this provision is intended to capture submissions to Price Reporting Agencies. If so, it is not clear that such communications are consistent with the definition of bids and offers under REMIT, nor with the principle that only firm bids and offers are reportable. If the underlying information is nonetheless considered necessary, we would suggest sourcing it directly from the relevant pricing agencies rather than imposing an additional reporting layer on LNG market participants.

3.5 Delivery terms definition: DES vs FOB

Scenario 2 of the consultation document — covering a spot-type transaction where the delivery point changes from a non-EU to an EU terminal — illustrates a broader principle worth making explicit: a transaction that does not specify any EU delivery at the time of the original agreement is not reportable under REMIT at that point. Reportability is triggered only when EU delivery is subsequently agreed. We wish to confirm that this same logic applies to FOB contracts concluded without any EU delivery specification, consistently with the framework set out in Section 3.5 of the ACER guidance.

To make this clearer for market participants, we would suggest complementing Section 3.5 with a concise summary matrix cross-referencing delivery terms — DES and FOB — against the presence or absence of an EU delivery specification at the time of contracting. Such a matrix would provide a straightforward, accessible overview of the applicable reportability rules and reduce the risk of inconsistent interpretation across MPs.

3.6 Reporting scenarios

We have identified certain textual inconsistencies in the document which are highlighted in the enclosed version.

Chapter 4.1 Parties to the contract

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

- Data Field (1) ID of the market participant
 - Data Field (2) Type of code used in field 1
 - Data Field (4) ID of the trader
 - Data Field (6) ID of the other market participant (counterparty)
 - Data Field (7) Type of code used in field 6
 - Data Field (8) Reporting entity ID
 - Data Field (10) Beneficiary ID
 - Data Field (11) Type of code used in field 9 and field 10
 - Data Field (12) Trading capacity of the market participant or counterparty in field 1
 - Data Field (13) Buy/sell indicator
-

Data Field (1) ID of the market participant

Reporting guidance:

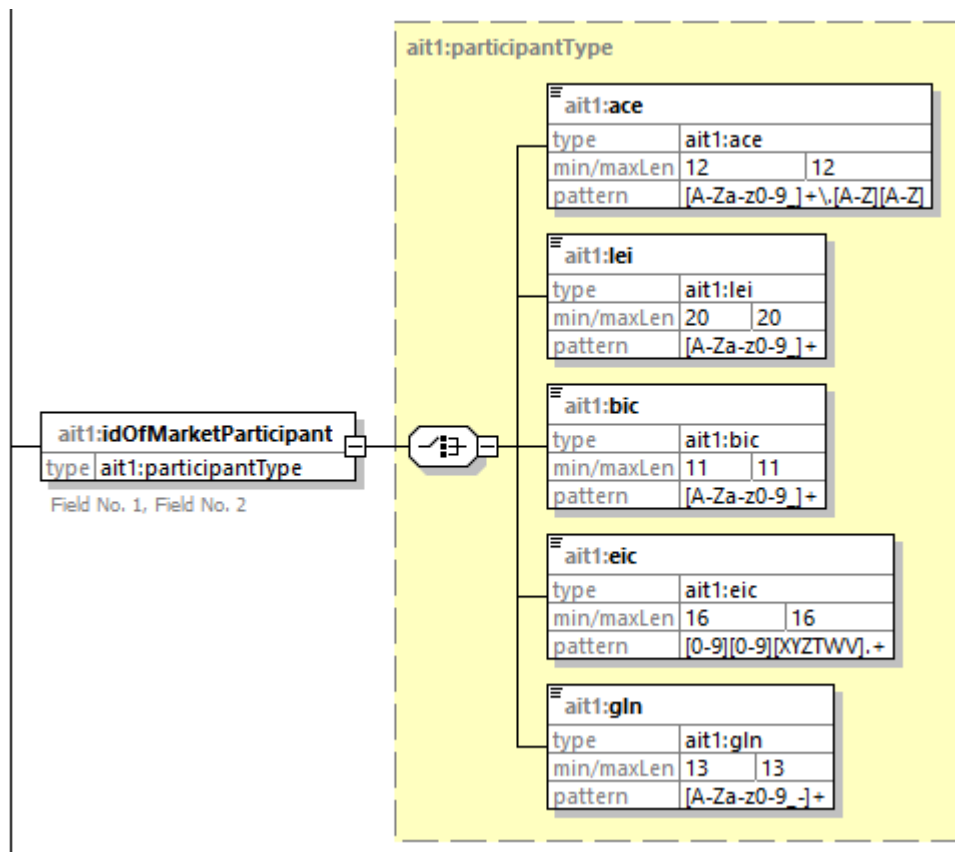
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

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

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

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

```
<xs:complexType name="participantType">
  <xs:choice>
    <xs:element name="ace" type="ait1:ace"/>
    <xs:element name="lei" type="ait1:lei"/>
    <xs:element name="bic" type="ait1:bic"/>
    <xs:element name="eic" type="ait1:eic"/>
    <xs:element name="gln" type="ait1:gln"/>
  </xs:choice>
</xs:complexType>
```

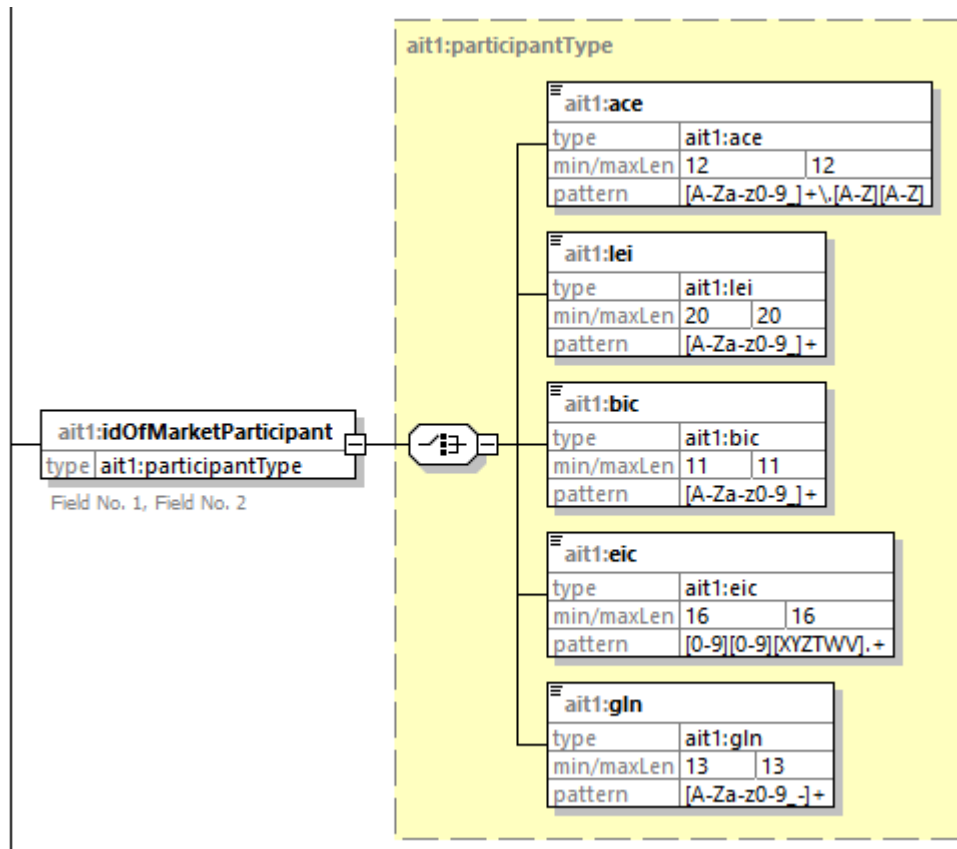
* Do you agree with the proposed implementation in the schema of the reporting of the ID of the market participant?

- Agree
- Don't agree

Data Field (2) Type of code used in field 1

Electronic format:

Proposed structure:



Schema attributes:

```

<xs:complexType name="participantType">
  <xs:choice>
    <xs:element name="ace" type="ait1:ace"/>
    <xs:element name="lei" type="ait1:lei"/>
    <xs:element name="bic" type="ait1:bic"/>
    <xs:element name="eic" type="ait1:eic"/>
    <xs:element name="gln" type="ait1:gln"/>
  </xs:choice>
</xs:complexType>

<xs:simpleType name="ace">
  <xs:restriction base="xs:string">

```

```
<xs:maxLength value="12"/>
<xs:minLength value="12"/>
<xs:pattern value="[A-Za-z0-9_]+\.[A-Z][A-Z]"/>
</xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="lei">
  <xs:restriction base="xs:string">
    <xs:maxLength value="20"/>
    <xs:minLength value="20"/>
    <xs:pattern value="[A-Za-z0-9_]+"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="bic">
  <xs:restriction base="xs:string">
    <xs:maxLength value="11"/>
    <xs:minLength value="11"/>
    <xs:pattern value="[A-Za-z0-9_]+"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="eic">
  <xs:restriction base="xs:string">
    <xs:maxLength value="16"/>
    <xs:minLength value="16"/>
    <xs:pattern value="[0-9][0-9][XYZTWV].+"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="gln">
  <xs:restriction base="xs:string">
    <xs:maxLength value="13"/>
    <xs:minLength value="13"/>
    <xs:pattern value="[A-Za-z0-9_-]+"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Type of code used in field 1?

- Agree
- Don't agree
- No opinion

Data Field (4) ID of the trader

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

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

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:

ait1:traderID	
type	ait1:traderCode
min/maxLen	1 100
pattern	[A-Za-z0-9_]+

Field No. 4

Schema attributes:

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

```
<xs:simpleType name="traderCode">
  <xs:restriction base="xs:string">
    <xs:minLength value="1"/>
    <xs:maxLength value="100"/>
    <xs:pattern value="[A-Za-z0-9_ ]+"/>
  </xs:restriction>
</xs:simpleType>
```

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

- Agree
- Don't agree

- No opinion

Data Field (6) ID of the other market participant (counterparty)

Reporting guidance:

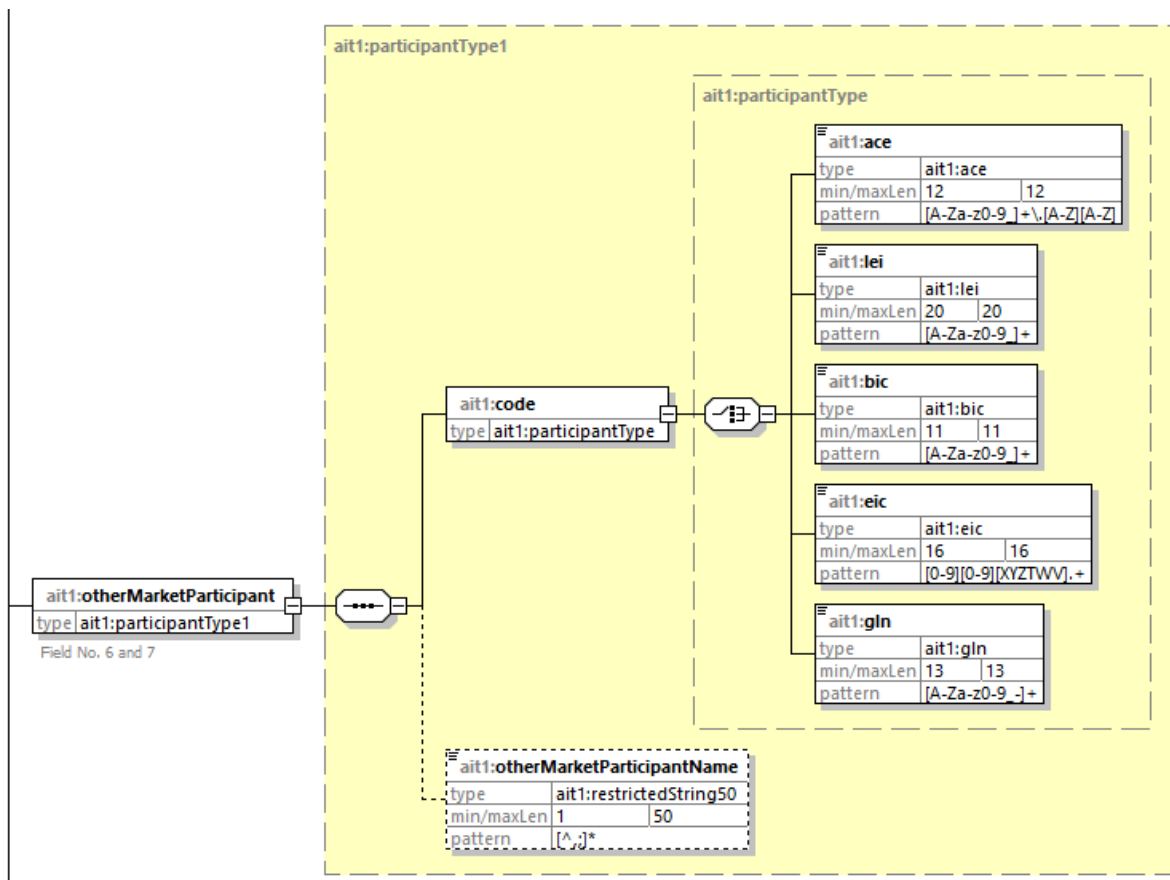
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the ID of the other market participant (counterparty)?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```

<xs:element name="otherMarketParticipant" type="ait1:participantType1">
  <xs:annotation>
    <xs:documentation>Field No. 6 and 7
    </xs:documentation>
  </xs:annotation>
</xs:element>

<xs:complexType name="participantType1">
  <xs:sequence>
    <xs:element name="code" type="ait1:participantType"/>
    <xs:element name="otherMarketParticipantName" type="ait1:restrictedString50" minOccurs="0"/>
  </xs:sequence>
</xs:complexType>

<xs:complexType name="participantType">
  <xs:choice>
    <xs:element name="ace" type="ait1:ace"/>
    <xs:element name="lei" type="ait1:lei"/>
    <xs:element name="bic" type="ait1:bic"/>
    <xs:element name="eic" type="ait1:eic"/>
    <xs:element name="gln" type="ait1:gln"/>
  </xs:choice>
</xs:complexType>

<xs:simpleType>
  <xs:restriction base="ait1:restrictedString50">
    <xs:maxLength value="50"/>
    <xs:pattern value="[A-Za-z0-9._%+-]+@[A-Za-z0-9.-]+\.[A-Za-z]{2,}"/>
  </xs:restriction>
</xs:simpleType>

```

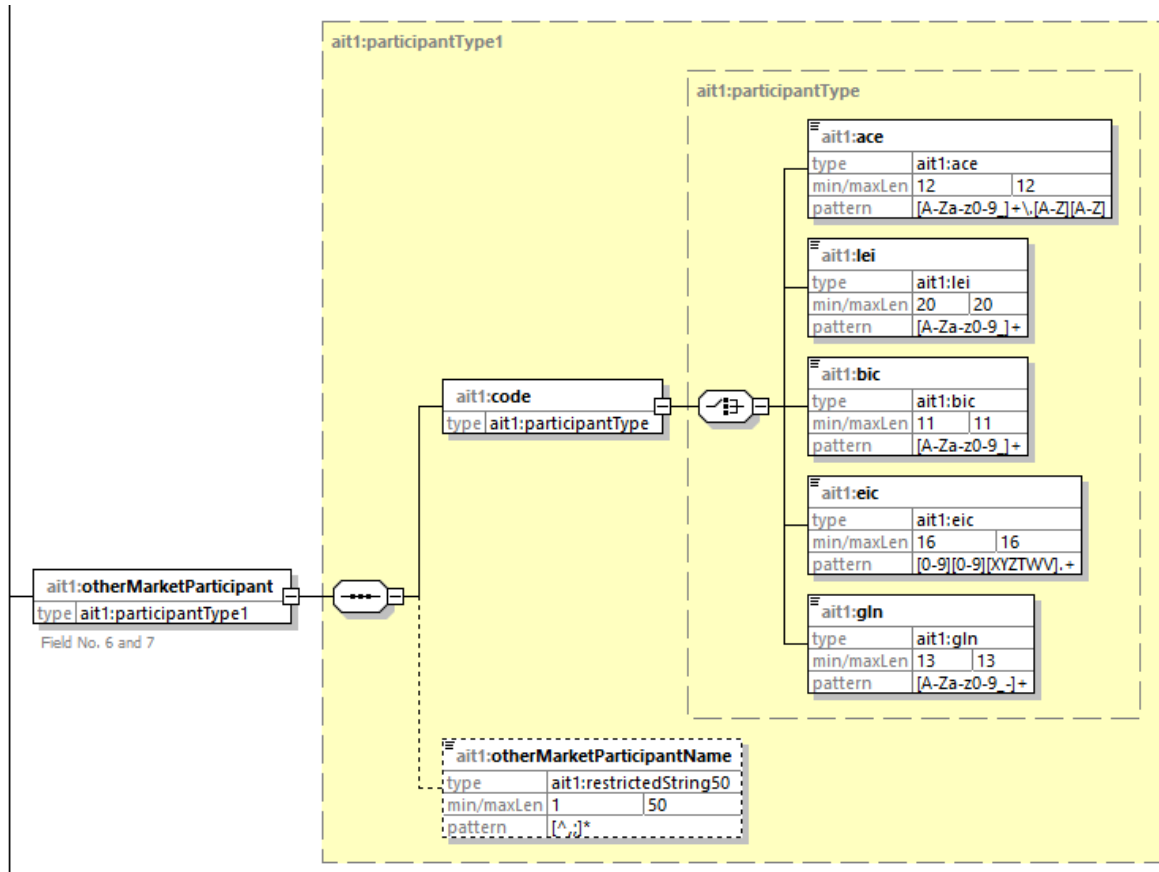
* Do you agree with the proposed implementation in the schema of the reporting of the ID of the other market participant (counterparty)?

- Agree
- Don't agree
- No opinion

Data Field (7) Type of code used in field 6

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:complexType name="participantType">
  <xs:choice>
    <xs:element name="ace" type="ait1:ace"/>
    <xs:element name="lei" type="ait1:lei"/>
    <xs:element name="bic" type="ait1:bic"/>
    <xs:element name="eic" type="ait1:eic"/>
    <xs:element name="gln" type="ait1:gln"/>
  </xs:choice>
</xs:complexType>

<xs:simpleType name="ace">
  <xs:restriction base="xs:string">
    <xs:maxLength value="12"/>
    <xs:minLength value="12"/>
    <xs:pattern value="[A-Za-z0-9_]+\.[A-Z][A-Z]"/>
  </xs:restriction>
</xs:simpleType>

<xs:simpleType name="lei">
```

```
<xs:restriction base="xs:string">
  <xs:maxLength value="20"/>
  <xs:minLength value="20"/>
  <xs:pattern value="[A-Za-z0-9_]+"/>
</xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="bic">
  <xs:restriction base="xs:string">
    <xs:maxLength value="11"/>
    <xs:minLength value="11"/>
    <xs:pattern value="[A-Za-z0-9_]+"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="eic">
  <xs:restriction base="xs:string">
    <xs:maxLength value="16"/>
    <xs:minLength value="16"/>
    <xs:pattern value="[0-9][0-9][XYZTWV].+"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="gln">
  <xs:restriction base="xs:string">
    <xs:maxLength value="13"/>
    <xs:minLength value="13"/>
    <xs:pattern value="[A-Za-z0-9_-]+"/>
  </xs:restriction>
</xs:simpleType>
```

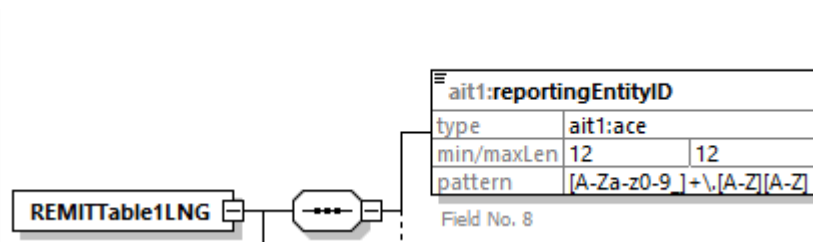
* Do you agree with the proposed implementation in the schema of the reporting of the Type of code used in field 6?

- Agree
- Don't agree
- No opinion

Data Field (8) Reporting entity ID

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="reportingEntityID" type="ait1:ace">
  <xs:annotation>
    <xs:documentation>Field No. 8</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="ace">
  <xs:restriction base="xs:string">
    <xs:maxLength value="12"/>
    <xs:minLength value="12"/>
    <xs:pattern value="[A-Za-z0-9_]+\.[A-Z][A-Z]"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Reporting entity ID?

- Agree
- Don't agree
- No opinion

Data Field (10) Beneficiary ID

Reporting guidance:

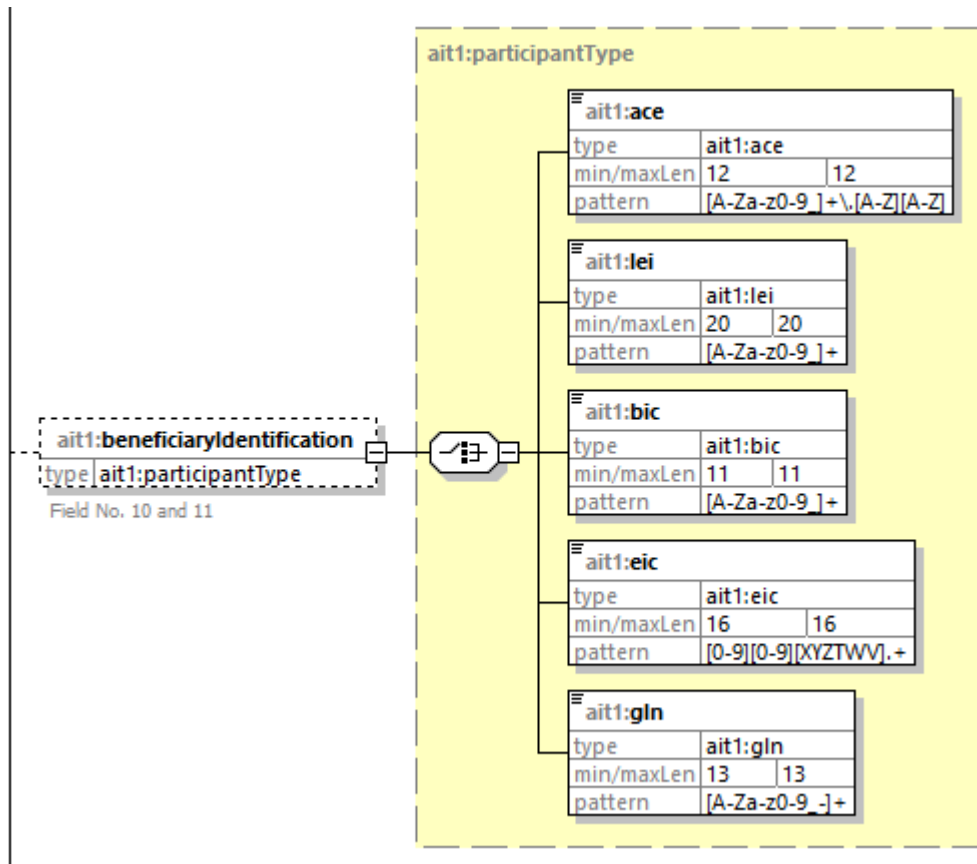
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

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

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

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

```
<xs:complexType name="participantType">  
  <xs:choice>  
    <xs:element name="ace" type="ait1:ace"/>  
    <xs:element name="lei" type="ait1:lei"/>  
    <xs:element name="bic" type="ait1:bic"/>  
    <xs:element name="eic" type="ait1:eic"/>  
    <xs:element name="gln" type="ait1:gln"/>  
  </xs:choice>  
</xs:complexType>
```

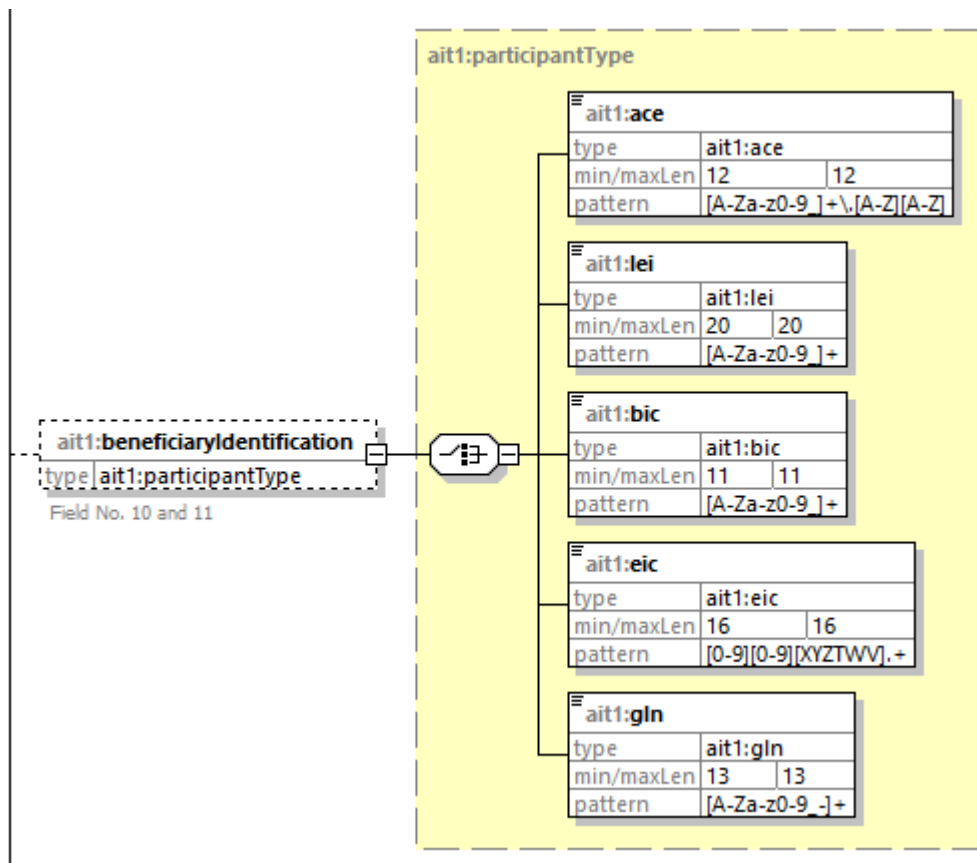
* Do you agree with the proposed implementation in the schema of the reporting of the Beneficiary ID?

- Agree
- Don't agree
- No opinion

Data Field (11) Type of code used in field 9 and in field 10

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:complexType name="participantType">
  <xs:choice>
    <xs:element name="ace" type="ait1:ace"/>
    <xs:element name="lei" type="ait1:lei"/>
    <xs:element name="bic" type="ait1:bic"/>
    <xs:element name="eic" type="ait1:eic"/>
    <xs:element name="gln" type="ait1:gln"/>
  </xs:choice>
</xs:complexType>
```

```
<xs:simpleType name="ace">
  <xs:restriction base="xs:string">
    <xs:maxLength value="12"/>
    <xs:minLength value="12"/>
    <xs:pattern value="[A-Za-z0-9_]+\.[A-Z][A-Z]"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="lei">
  <xs:restriction base="xs:string">
    <xs:maxLength value="20"/>
    <xs:minLength value="20"/>
    <xs:pattern value="[A-Za-z0-9_]+"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="bic">
  <xs:restriction base="xs:string">
    <xs:maxLength value="11"/>
    <xs:minLength value="11"/>
    <xs:pattern value="[A-Za-z0-9_]+"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="eic">
  <xs:restriction base="xs:string">
    <xs:maxLength value="16"/>
    <xs:minLength value="16"/>
    <xs:pattern value="[0-9][0-9][XYZTWV].+"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="gln">
  <xs:restriction base="xs:string">
    <xs:maxLength value="13"/>
    <xs:minLength value="13"/>
    <xs:pattern value="[A-Za-z0-9_-]+"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Type of code used in field 9 and in field 10?

Agree

- Don't agree
- No opinion

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

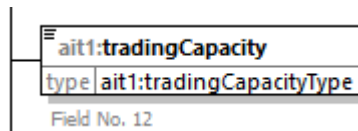
Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

- * Do you agree with the proposed guidance for the reporting of the Trading capacity of the market participant or counterparty in field 1?
- Agree
 - Don't agree
 - No opinion

Electronic format:

Proposed structure:



Schema attributes:

```

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

```

<xs:simpleType name="tradingCapacityType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="P"/>
    <xs:enumeration value="A"/>
  </xs:restriction>
</xs:simpleType>
  
```

* Do you agree with the proposed implementation in the schema of the reporting of the Trading capacity of the market participant or counterparty in field 1?

- Agree
- Don't agree
- No opinion

Data Field (13) Buy/sell indicator

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Buy/sell indicator?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="buySellIndicator" type="ait1:buySellIndicatorType">
  <xs:annotation>
    <xs:documentation>Field No. 13</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="buySellIndicatorType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="B"/>
    <xs:enumeration value="S"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Buy/sell indicator?

- Agree
- Don't agree
- No opinion

Chapter 4.3 Contract details

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

- Data Field (24) Contract name
 - Data Field (25) Contract type
 - Data Field (27) Fixing index or reference price
 - Data Field (28) Fixing index types
 - Data Field (29) Fixing index sources
 - Data Field (30) Index fixing interval
 - Data Field (31) Fixing frequency
 - Data Field (33) Organised marketplace ID/OTC
-

Data Field (24) Contract name

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Contract name?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:

ait1:contractName	
type	ait1:contractNameType
min/maxLen	1 200

Field No. 24

Schema attributes:

```
<xs:element name="contractName" type="ait1:contractNameType">  
  <xs:annotation>  
    <xs:documentation>Field No. 24</xs:documentation>  
  </xs:annotation>  
</xs:element>
```

```
<xs:simpleType name="contractNameType">  
  <xs:restriction base="xs:string">  
    <xs:minLength value="1"/>  
    <xs:maxLength value="200"/>  
  </xs:restriction>  
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Contract name?

- Agree
- Don't agree
- No opinion

Data Field (25) Contract type

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to propose additional type of contracts to be included in this field but not covered under the currently proposed list of values.

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

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

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

```
<xs:simpleType name="contractTypeType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="SWG"/>
    <xs:enumeration value="FW"/>
    <xs:enumeration value="FU"/>
    <xs:enumeration value="SP"/>
    <xs:enumeration value="SW"/>
    <xs:enumeration value="OT"/>
    <xs:enumeration value="SO"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Contract type?

- Agree
- Don't agree
- No opinion

Data Field (27) Fixing index or reference price

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

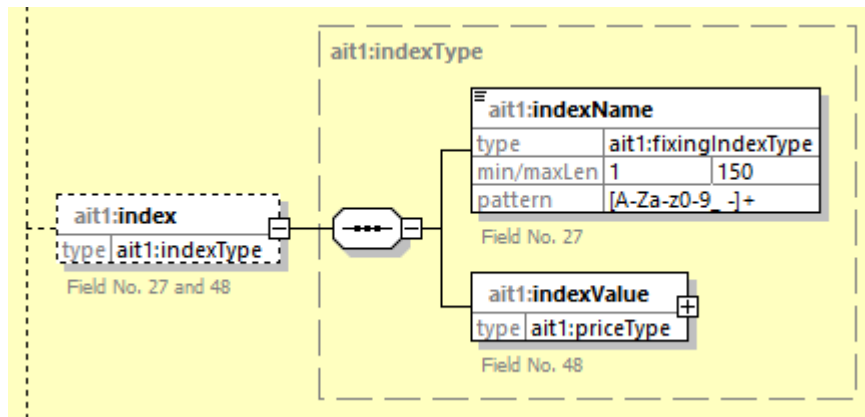
* Do you agree with the proposed guidance for the reporting of the Fixing index or reference price?

- Agree

- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```

<xs:element name="index" type="ait1:indexType" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 27 and 48</xs:documentation>
  </xs:annotation>
</xs:element>

```

```

<xs:complexType name="indexType">
  <xs:sequence>
    <xs:element name="indexName" type="ait1:fixingIndexType">
      <xs:annotation>
        <xs:documentation>Field No. 27 </xs:documentation>
      </xs:annotation>
    </xs:element>
    <xs:element name="indexValue" type="ait1:priceType">
      <xs:annotation>
        <xs:documentation>Field No. 48</xs:documentation>
      </xs:annotation>
    </xs:element>
  </xs:sequence>
</xs:complexType>

```

```

<xs:simpleType name="fixingIndexType">
  <xs:restriction base="xs:string">

```

```

    <xs:minLength value="1"/>
    <xs:maxLength value="150"/>
    <xs:pattern value="[A-Za-z0-9_ -] +"/>
  </xs:restriction>
</xs:simpleType>

```

* Do you agree with the proposed implementation in the schema of the reporting of the Fixing index or reference price?

- Agree
- Don't agree
- No opinion

Data Field (28) Fixing Index types

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM. The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

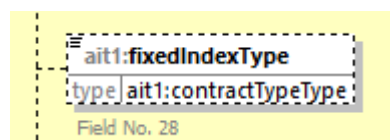
Respondents are invited to provide use cases when the value 'OT' would be applicable. Otherwise it may be removed from the list of accepted values upon publication.

* Do you agree with the proposed guidance for the reporting of the Fixing index types?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```

<xs:element name="fixedIndexType" type="ait1:contractTypeType" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 28</xs:documentation>
  </xs:annotation>
</xs:element>

```

```
</xs:annotation>
</xs:element>

<xs:simpleType name="contractTypeType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="SWG"/>
    <xs:enumeration value="FW"/>
    <xs:enumeration value="FU"/>
    <xs:enumeration value="SP"/>
    <xs:enumeration value="SW"/>
    <xs:enumeration value="OT"/>
    <xs:enumeration value="SO"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Fixing index types?

- Agree
- Don't agree
- No opinion

Data Field (29) Fixing index sources

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

* Do you agree with the proposed guidance for the reporting of the Fixing index sources?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:

ait1:fixingIndexSource	
type	ait1:restrictedString
min/maxLen	1 100
pattern	[A-Za-z0-9_]+

Field No. 29

Schema attributes:

```
<xs:element name="fixingIndexSource" type="ait1:restrictedString" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 29</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="restrictedString">
  <xs:restriction base="xs:string">
    <xs:minLength value="1"/>
    <xs:maxLength value="100"/>
    <xs:pattern value="[A-Za-z0-9_]+"/>
  </xs:restriction>
</xs:simpleType>
```

- * Do you agree with the proposed implementation in the schema of the reporting of the Fixing index sources?
- Agree
- Don't agree
- No opinion

Data Field (30) Index fixing interval

Reporting guidance:

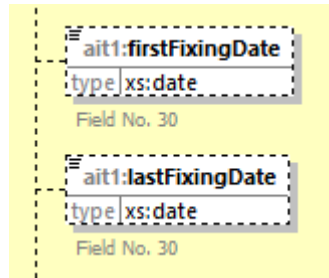
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

- * Do you agree with the proposed guidance for the reporting of the Index fixing interval?
- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<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>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Index fixing interval?

- Agree
- Don't agree
- No opinion

Data Field (31) Fixing frequency

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

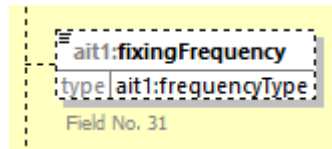
The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

* Do you agree with the proposed guidance for the reporting of the Fixing frequency?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="fixingFrequency" type="ait1:frequencyType" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 31</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="frequencyType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="D"/>
    <xs:enumeration value="W"/>
    <xs:enumeration value="M"/>
    <xs:enumeration value="Q"/>
    <xs:enumeration value="S"/>
    <xs:enumeration value="A"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Fixing frequency?

- Agree
- Don't agree
- No opinion

Data Field (33) Organised marketplace ID/OTC

Reporting guidance:

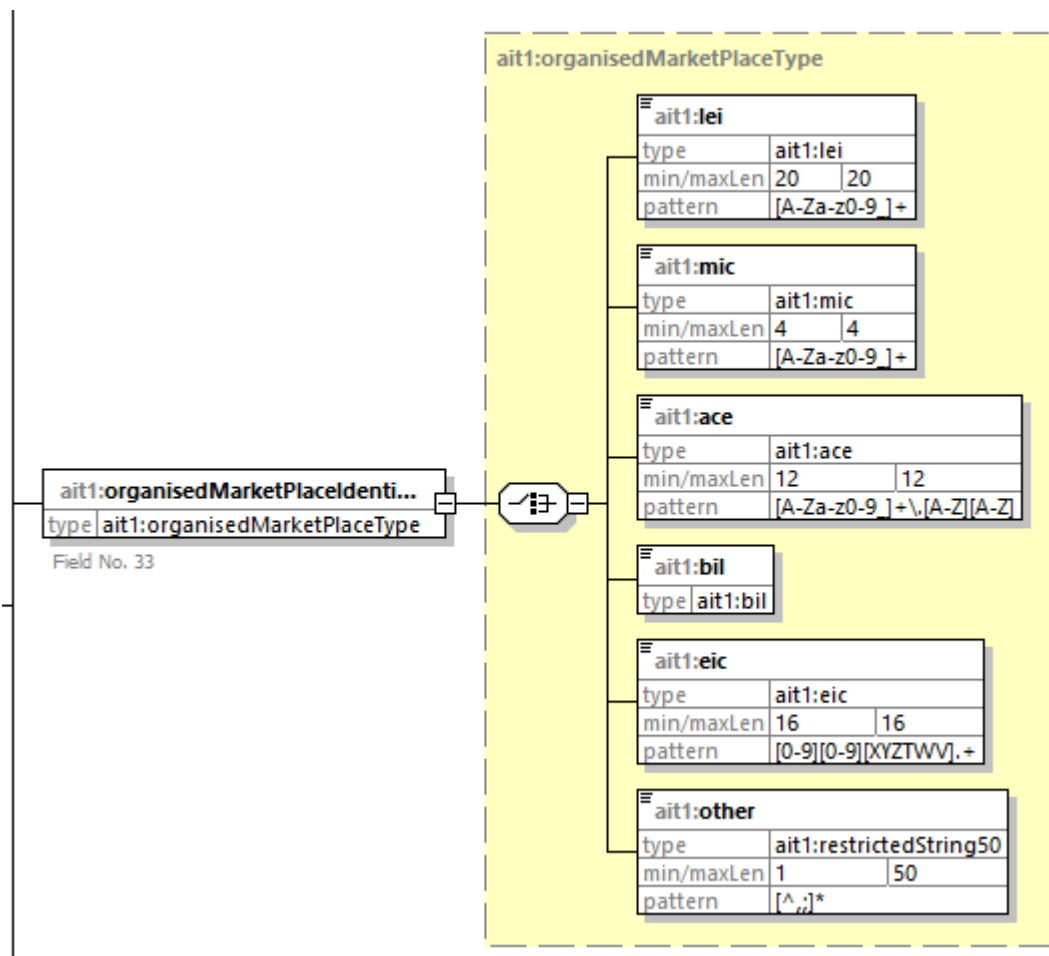
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Organised marketplace ID/OTC?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="organisedMarketPlacelIdentifier" type="ait1:organisedMarketPlaceType">
  <xs:annotation>
    <xs:documentation>Field No. 33</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:complexType name="organisedMarketPlaceType">
```

```

<xs:choice>
  <xs:element name="lei" type="ait1:lei"/>
  <xs:element name="mic" type="ait1:mic"/>
  <xs:element name="ace" type="ait1:ace"/>
  <xs:element name="bil" type="ait1:bil"/>
  <xs:element name="eic" type="ait1:eic"/>
  <xs:element name="other" type="ait1:restrictedString50"/>
</xs:choice>
</xs:complexType>

```

```

<xs:simpleType name="lei">
  <xs:restriction base="xs:string">
    <xs:maxLength value="20"/>
    <xs:minLength value="20"/>
    <xs:pattern value="[A-Za-z0-9_]+"/>
  </xs:restriction>
</xs:simpleType>

```

```

<xs:simpleType name="mic">
  <xs:restriction base="xs:string">
    <xs:maxLength value="4"/>
    <xs:minLength value="4"/>
    <xs:pattern value="[A-Za-z0-9_]+"/>
  </xs:restriction>
</xs:simpleType>

```

```

<xs:simpleType name="ace">
  <xs:restriction base="xs:string">
    <xs:maxLength value="12"/>
    <xs:minLength value="12"/>
    <xs:pattern value="[A-Za-z0-9_]+\.[A-Z][A-Z]"/>
  </xs:restriction>
</xs:simpleType>

```

```

<xs:simpleType name="bil">
  <xs:restriction base="xs:string">
    <xs:enumeration value="XBIL"/>
  </xs:restriction>
</xs:simpleType>

```

```

<xs:simpleType name="eic">
  <xs:restriction base="xs:string">
    <xs:maxLength value="16"/>
  </xs:restriction>
</xs:simpleType>

```

```

        <xs:minLength value="16"/>
        <xs:pattern value="[0-9][0-9][XYZTWV].+"/>
    </xs:restriction>
</xs:simpleType>

<xs:simpleType name="restrictedString50">
    <xs:restriction base="xs:string">
        <xs:maxLength value="50"/>
        <xs:minLength value="1"/>
        <xs:pattern value="^[^,;]*"/>
    </xs:restriction>
</xs:simpleType>

```

* Do you agree with the proposed implementation in the schema of the reporting of the Organised marketplace ID/OTC?

- Agree
 Don't agree
 No opinion

Chapter 4.4 Transaction details

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

- Data Field (37) Transaction timestamp
- Data Field (38) Unique transaction ID
- Data Field (39) Linked transaction ID
- Data Field (45) Price
- Data Field (46) Price formula
- Data Field (47) Price in EUR/MWh
- Data Field (48) Index value
- Data Field (49) Price currency and unit
- Data Field (50) Notional amount
- Data Field (51) Notional amount in EUR
- Data Field (52) Notional currency
- Data Field (54) Total notional contract quantity
- Data Field (55) Total notional contract quantity in MWh
- Data Field (56) Quantity unit for field 53 and 54
- Data Field (57) Termination date

Data Field (37) Transaction timestamp

Reporting guidance:

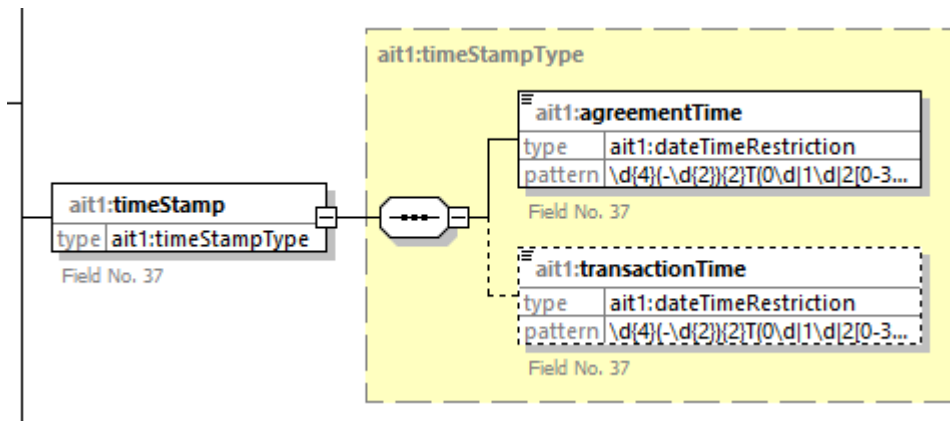
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

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

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

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

```
<xs:complexType name="timeStampType">
  <xs:sequence>
    <xs:element name="agreementTime" type="ait1:dateTimeRestriction">
      <xs:annotation>
        <xs:documentation>Field No. 37</xs:documentation>
      </xs:annotation>
    </xs:element>
    <xs:element name="transactionTime" type="ait1:dateTimeRestriction" minOccurs="0">
```

```
<xs:annotation>
  <xs:documentation>Field No. 37</xs:documentation>
</xs:annotation>
</xs:element>
</xs:sequence>
</xs:complexType>

<xs:simpleType name="dateTimeRestriction">
  <xs:restriction base="xs:dateTime">
    <xs:pattern value="\d{4}(-\d{2}){2}T(0\d|1\d|2[0-3]):[0-5]\d:[0-5]\d(\.\d{1,})?(Z|[+-]\d{2}:\d{2})"/>
  </xs:restriction>
</xs:simpleType>
```

- * Do you agree with the proposed implementation in the schema of the reporting of the Transaction timestamp?
- Agree
 - Don't agree
 - No opinion
-

Data Field (38) Unique transaction ID

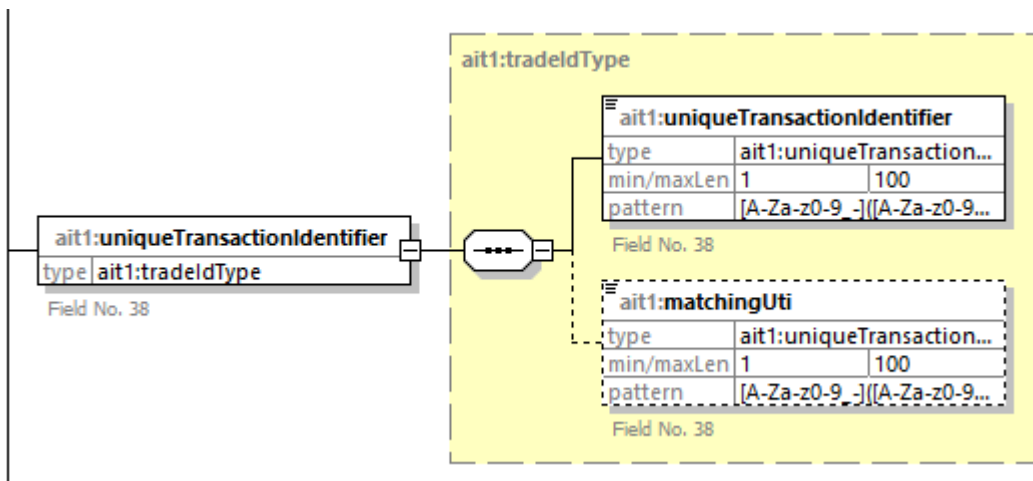
Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

- * Do you agree with the proposed guidance for the reporting of the Unique transaction ID?
- Agree
 - Don't agree
 - No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="uniqueTransactionIdentifier" type="ait1:traldeldType">
  <xs:annotation>
    <xs:documentation>Field No. 38</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:complexType name="traldeldType">
  <xs:sequence>
    <xs:element name="uniqueTransactionIdentifier" type="ait1:uniqueTransactionIdentifierType">
      <xs:annotation>
        <xs:documentation>Field No. 38</xs:documentation>
      </xs:annotation>
    </xs:element>
    <xs:element name="matchingUti" type="ait1:uniqueTransactionIdentifierType" minOccurs="0">
      <xs:annotation>
        <xs:documentation>Field No. 38</xs:documentation>
      </xs:annotation>
    </xs:element>
  </xs:sequence>
</xs:complexType>
```

```
<xs:simpleType name="uniqueTransactionIdentifierType">
  <xs:restriction base="xs:string">
    <xs:minLength value="1"/>
    <xs:maxLength value="100"/>
    <xs:pattern value="[A-Za-z0-9_-]([A-Za-z0-9_-]*[A-Za-z0-9_-])?"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Unique transaction ID?

- Agree
- Don't agree
- No opinion

Data Field (39) Linked transaction ID

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are also invited to provide feedback on cases when the LNG market data record related to an Execution (reported real time) would be reported earlier than the linked non-standard contract reported in T+10 in Table 2.

* Do you agree with the proposed guidance for the reporting of the Linked transaction ID?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:

ait1:linkedTransactionId	
type	ait1:uniqueTransaction...
min/maxLen	1 100
pattern	[A-Za-z0-9 _][A-Za-z0-9...

Field No. 39

Schema attributes:

```
<xs:element name="linkedTransactionId" type="ait1:uniqueTransactionIdentifierType" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 39</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="uniqueTransactionIdentifierType">
  <xs:restriction base="xs:string">
    <xs:minLength value="1"/>
  </xs:restriction>
</xs:simpleType>
```

```

    <xs:maxLength value="100"/>
    <xs:pattern value="[A-Za-z0-9_-]([A-Za-z0-9_-]*[A-Za-z0-9_-])?"/>
  </xs:restriction>
</xs:simpleType>

```

- * Do you agree with the proposed implementation in the schema of the reporting of the Linked transaction ID?
 - Agree
 - Don't agree
 - No opinion

Data Field (45) Price

Reporting guidance:

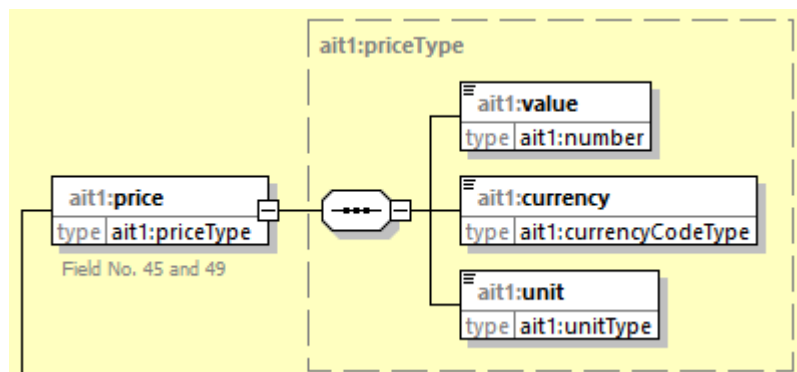
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

- * Do you agree with the proposed guidance for the reporting of the Price?
 - Agree
 - Don't agree
 - No opinion

Electronic format:

Proposed structure:



Proposed structure:

```

<xs:element name="price" type="ait1:priceType">

```

```

    <xs:annotation>
      <xs:documentation>Field No. 45 and 49</xs:documentation>
    </xs:annotation>
  </xs:element>

<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:unitType"/>
  </xs:sequence>
</xs:complexType>

<xs:simpleType name="number">
  <xs:restriction base="xs:decimal">
    <xs:totalDigits value="20"/>
    <xs:fractionDigits value="5"/>
  </xs:restriction>
</xs:simpleType>

<xs:simpleType name="currencyCodeType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="GBX"/>
    <xs:enumeration value="CHF"/>
    <xs:enumeration value="CZK"/>
    <xs:enumeration value="DKK"/>
    <xs:enumeration value="EUR"/>
    <xs:enumeration value="GBP"/>
    <xs:enumeration value="HUF"/>
    <xs:enumeration value="ISK"/>
    <xs:enumeration value="NOK"/>
    <xs:enumeration value="PCT"/>
    <xs:enumeration value="PLN"/>
    <xs:enumeration value="RON"/>
    <xs:enumeration value="SEK"/>
    <xs:enumeration value="USD"/>
    <xs:enumeration value="TRY"/>
  </xs:restriction>
</xs:simpleType>

<xs:simpleType name="unitType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="GWh"/>
  </xs:restriction>
</xs:simpleType>

```

```
<xs:enumeration value="KWh"/>
<xs:enumeration value="MWh"/>
<xs:enumeration value="cm"/>
<xs:enumeration value="GJ"/>
<xs:enumeration value="MMBtu"/>
<xs:enumeration value="Therm"/>
<xs:enumeration value="Btu"/>
</xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Price?

- Agree
- Don't agree
- No opinion

Data Field (46) Price formula

Reporting guidance:

Respondents are invited to provide feedback on the proposed price formula structure covering Data Fields 27, 28, 29, 30, 31, 46 and 48. In the electronic format, the price formula is proposed to be reported in the priceDetails section. For reporting the formula, the <formulaComponent> section is proposed to be used where the different components of the formula are expected to be reported in the relevant subfields. As an optional free text field <priceFormulaText> can also be used to specify the details of the formula in a description. For fixed-price transactions, only the <price> field is mandatory. For index-based transactions, the price formula should clearly indicate the relevant index or indices, as well as the fixed and variable components of the formula.

* Do you agree with the proposed guidance for the reporting of the Price formula?

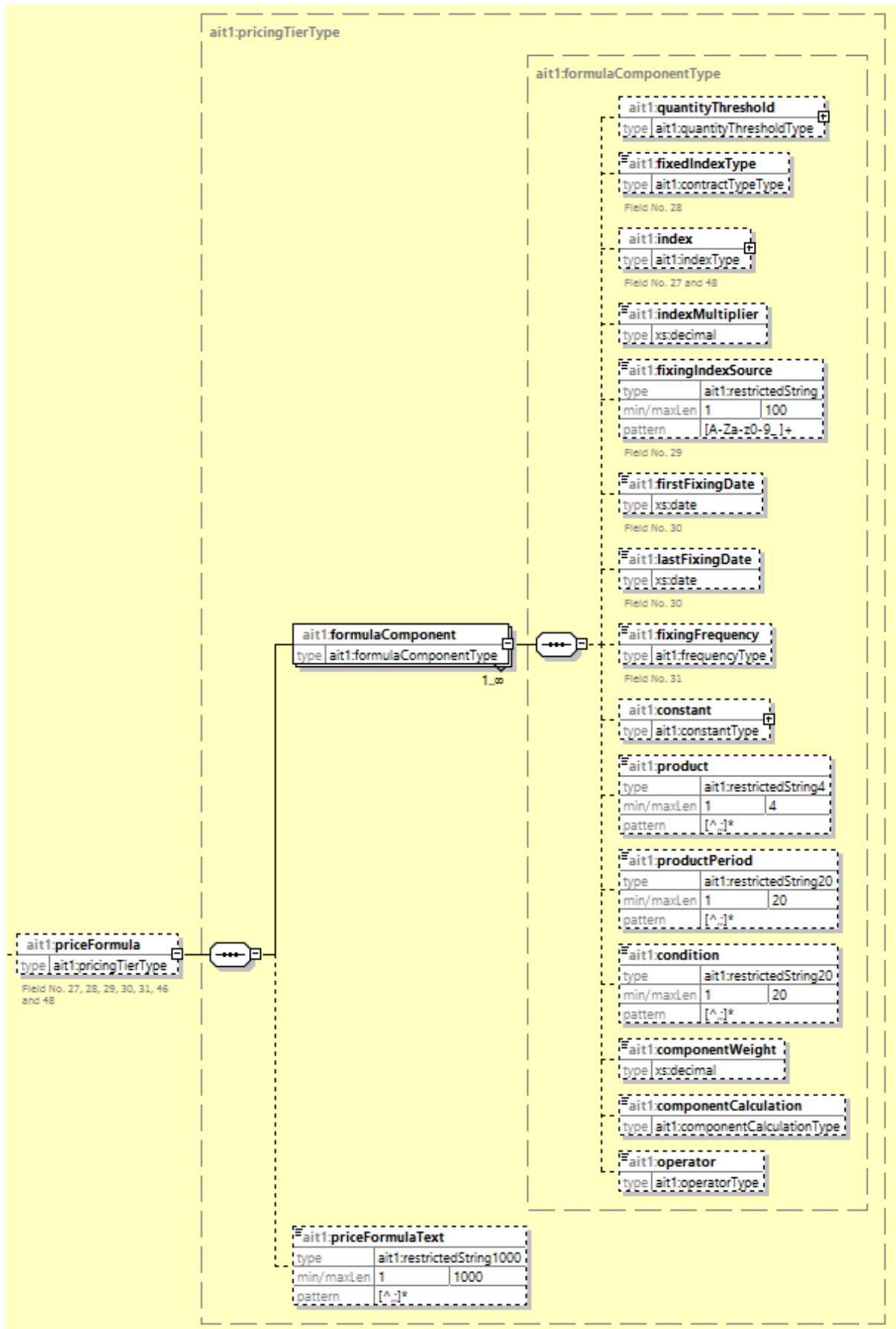
- Agree
- Don't agree
- No opinion

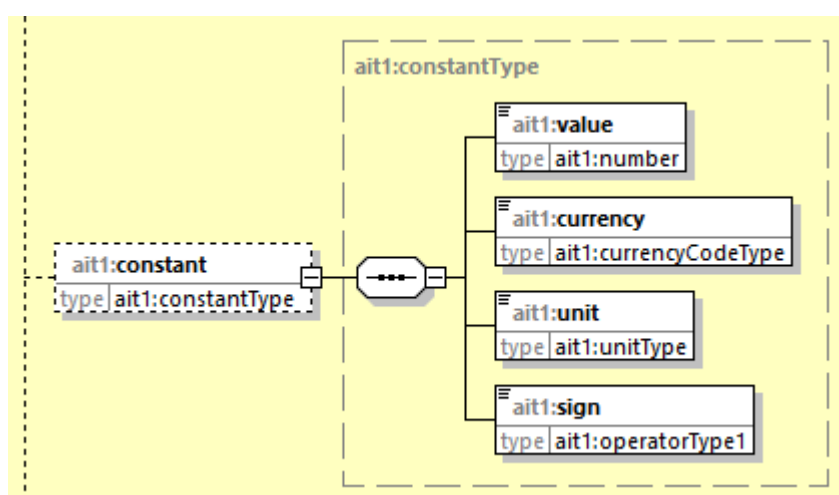
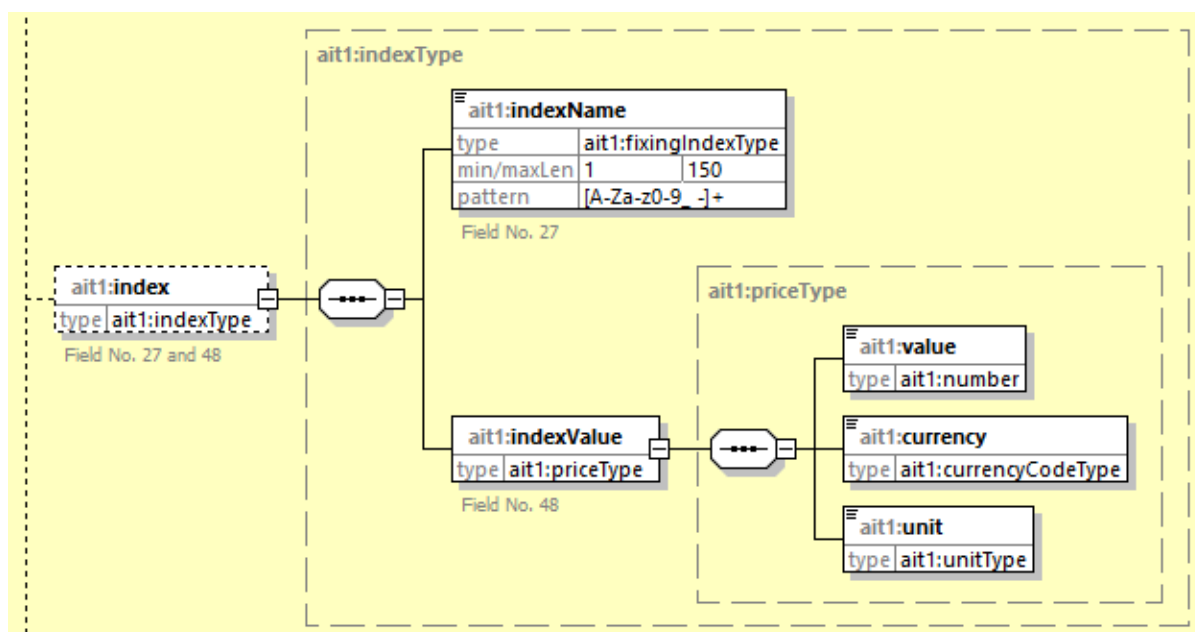
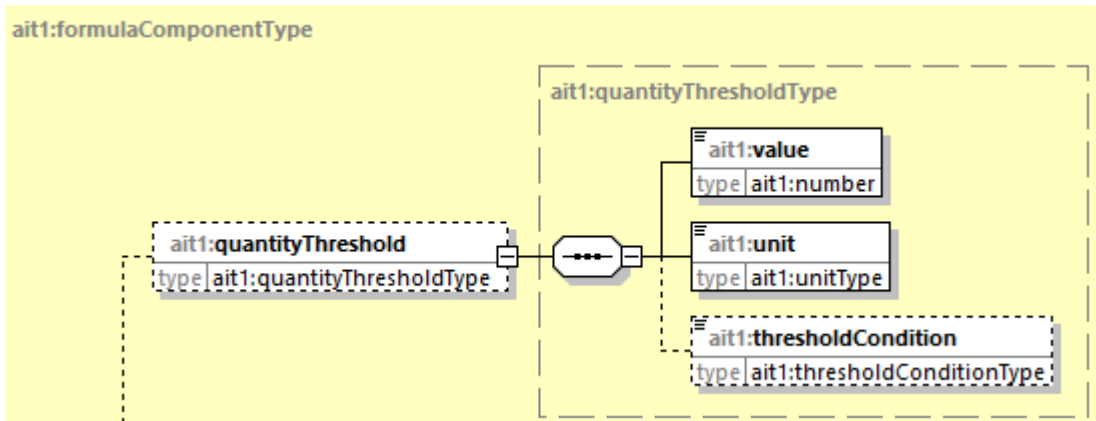
* If not agreed, please provide an alternative:

In field description it should be clarified in the text that where a price formula is complex but does not embed any optionality, the transaction retains its character as a spot LNG transaction and should accordingly be reported in Table 1.

Electronic format:

Proposed structure:





Schema attributes:

```
<xs:complexType name="priceDetailsType">
  <xs:element name="priceOrPriceFormula" type="ait1:priceOrPriceFormulaType">
    <xs:annotation>
      <xs:documentation>Field No. 27, 28, 29, 30, 31, 45, 46, 48 and 49</xs:documentation>
    </xs:annotation>
  </xs:element>
</xs:complexType>
```

```

        </xs:annotation>
    </xs:element>
</xs:complexType>

<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:pricingTierType" minOccurs="0">
            <xs:annotation>
                <xs:documentation>Field No. 27, 28, 29, 30, 31, 46 and 48</xs:documentation>
            </xs:annotation>
        </xs:element>
    </xs:sequence>
</xs:complexType>

<xs:complexType name="pricingTierType">
    <xs:sequence>
        <xs:element name="formulaComponent" type="ait1:formulaComponentType" maxOccurs="unbounded"/>
        <xs:element name="priceFormulaText" type="ait1:restrictedString1000" minOccurs="0"/>
    </xs:sequence>
</xs:complexType>

<xs:complexType name="formulaComponentType">
    <xs:sequence>
        <xs:element name="quantityThreshold" type="ait1:quantityThresholdType" minOccurs="0"/>
        <xs:element name="fixedIndexType" type="ait1:contractTypeType" minOccurs="0">
            <xs:annotation>
                <xs:documentation>Field No. 28</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="index" type="ait1:indexType" minOccurs="0">
            <xs:annotation>
                <xs:documentation>Field No. 27 and 48</xs:documentation>
            </xs:annotation>
        </xs:element>
        <xs:element name="indexMultiplier" type="xs:decimal" minOccurs="0"/>
        <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="constant" type="ait1:constantType" minOccurs="0"/>
    <xs:element name="product" type="ait1:restrictedString4" minOccurs="0"/>
    <xs:element name="productPeriod" type="ait1:restrictedString20" minOccurs="0"/>
    <xs:element name="condition" type="ait1:restrictedString20" minOccurs="0"/>
    <xs:element name="componentWeight" type="xs:decimal" minOccurs="0"/>
    <xs:element name="componentCalculation" type="ait1:componentCalculationType" minOccurs="0"/>
    <xs:element name="operator" type="ait1:operatorType" minOccurs="0">
        <xs:annotation>
            <xs:documentation/>
        </xs:annotation>
    </xs:element>
</xs:sequence>
</xs:complexType>

<xs:simpleType name="thresholdConditionType">
    <xs:restriction base="xs:string">
        <xs:enumeration value="UP_TO"/>
        <xs:enumeration value="ABOVE"/>
    </xs:restriction>
</xs:simpleType>

<xs:simpleType name="contractTypeType">
    <xs:restriction base="xs:string">
        <xs:enumeration value="SWG"/>
    </xs:restriction>
</xs:simpleType>

```

```

        <xs:enumeration value="FW"/>
        <xs:enumeration value="FU"/>
        <xs:enumeration value="SP"/>
        <xs:enumeration value="SW"/>
        <xs:enumeration value="OT"/>
        <xs:enumeration value="SO"/>
    </xs:restriction>
</xs:simpleType>

<xs:simpleType name="frequencyType">
    <xs:restriction base="xs:string">
        <xs:enumeration value="D"/>
        <xs:enumeration value="W"/>
        <xs:enumeration value="M"/>
        <xs:enumeration value="Q"/>
        <xs:enumeration value="S"/>
        <xs:enumeration value="A"/>
    </xs:restriction>
</xs:simpleType>

<xs:complexType name="constantType">
    <xs:sequence>
        <xs:element name="value" type="ait1:number"/>
        <xs:element name="currency" type="ait1:currencyCodeType"/>
        <xs:element name="unit" type="ait1:unitType"/>
        <xs:element name="sign" type="ait1:operatorType1"/>
    </xs:sequence>
</xs:complexType>

<xs:simpleType name="number">
    <xs:restriction base="xs:decimal">
        <xs:totalDigits value="20"/>
        <xs:fractionDigits value="5"/>
    </xs:restriction>
</xs:simpleType>

<xs:simpleType name="currencyCodeType">
    <xs:restriction base="xs:string">
        <xs:enumeration value="GBX"/>
        <xs:enumeration value="CHF"/>
        <xs:enumeration value="CZK"/>
        <xs:enumeration value="DKK"/>
        <xs:enumeration value="EUR"/>
    </xs:restriction>
</xs:simpleType>

```

```

    <xs:enumeration value="GBP"/>
    <xs:enumeration value="HUF"/>
    <xs:enumeration value="ISK"/>
    <xs:enumeration value="NOK"/>
    <xs:enumeration value="PCT"/>
    <xs:enumeration value="PLN"/>
    <xs:enumeration value="RON"/>
    <xs:enumeration value="SEK"/>
    <xs:enumeration value="USD"/>
    <xs:enumeration value="TRY"/>
  </xs:restriction>
</xs:simpleType>

<xs:simpleType name="unitType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="GWh"/>
    <xs:enumeration value="KWh"/>
    <xs:enumeration value="MWh"/>
    <xs:enumeration value="cm"/>
    <xs:enumeration value="GJ"/>
    <xs:enumeration value="MMBtu"/>
    <xs:enumeration value="Therm"/>
    <xs:enumeration value="Btu"/>
  </xs:restriction>
</xs:simpleType>

<xs:simpleType name="operatorType1">
  <xs:restriction base="xs:string">
    <xs:enumeration value="PLUS"/>
    <xs:enumeration value="MINUS"/>
  </xs:restriction>
</xs:simpleType>

<xs:simpleType name="componentCalculationType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="PLUS"/>
    <xs:enumeration value="MINUS"/>
    <xs:enumeration value="MULTIPLIED_BY"/>
    <xs:enumeration value="DIVIDED_BY"/>
  </xs:restriction>
</xs:simpleType>

<xs:simpleType name="operatorType">

```

```
<xs:restriction base="xs:string">
  <xs:enumeration value="OR"/>
  <xs:enumeration value="PLUS"/>
  <xs:enumeration value="MINUS"/>
  <xs:enumeration value="AVERAGE"/>
</xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="restrictedString1000">
  <xs:restriction base="xs:string">
    <xs:maxLength value="1000"/>
    <xs:minLength value="1"/>
    <xs:pattern value="^[^,;]*"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Price formula?

- Agree
- Don't agree
- No opinion

Data Field (47) Price in EUR/MWh

Reporting guidance:

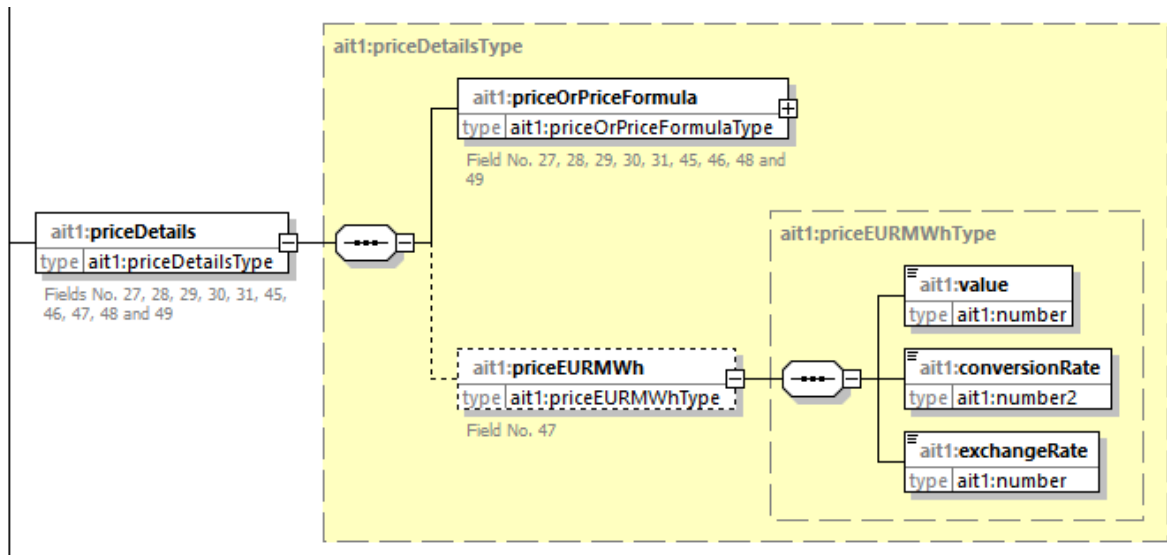
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Price in EUR/MWh?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:complexType name="priceEURMWhType">
  <xs:sequence>
    <xs:element name="value" type="ait1:number"/>
    <xs:element name="conversionRate" type="ait1:number2"/>
    <xs:element name="exchangeRate" type="ait1:number"/>
  </xs:sequence>
</xs:complexType>
```

```
<xs:simpleType name="number">
  <xs:restriction base="xs:decimal">
    <xs:totalDigits value="20"/>
    <xs:fractionDigits value="5"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="number2">
  <xs:restriction base="xs:decimal">
    <xs:totalDigits value="20"/>
    <xs:fractionDigits value="6"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Price in EUR/MWh?

- Agree
- Don't agree
- No opinion

Data Field (48) Index value

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

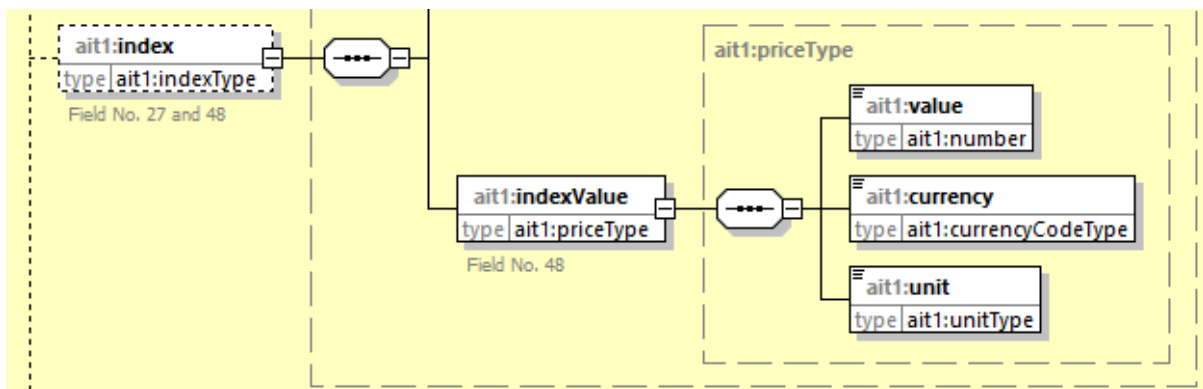
The proposed requirements shall be consulted together with those described under Data Field (46) Price formula.

* Do you agree with the proposed guidance for the reporting of the Index value?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="index" type="ait1:indexType" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 27 and 48</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:complexType name="indexType">
  <xs:element name="indexValue" type="ait1:priceType">
    <xs:annotation>
      <xs:documentation>Field No. 48</xs:documentation>
    </xs:annotation>
  </xs:element>
```

```
</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:unitType"/>
```

```
  </xs:sequence>
```

```
</xs:complexType>
```

```
<xs:simpleType name="number">
```

```
  <xs:restriction base="xs:decimal">
```

```
    <xs:totalDigits value="20"/>
```

```
    <xs:fractionDigits value="5"/>
```

```
  </xs:restriction>
```

```
</xs:simpleType>
```

```
<xs:simpleType name="currencyCodeType">
```

```
  <xs:restriction base="xs:string">
```

```
    <xs:enumeration value="GBX"/>
```

```
    <xs:enumeration value="CHF"/>
```

```
    <xs:enumeration value="CZK"/>
```

```
    <xs:enumeration value="DKK"/>
```

```
    <xs:enumeration value="EUR"/>
```

```
    <xs:enumeration value="GBP"/>
```

```
    <xs:enumeration value="HUF"/>
```

```
    <xs:enumeration value="ISK"/>
```

```
    <xs:enumeration value="NOK"/>
```

```
    <xs:enumeration value="PCT"/>
```

```
    <xs:enumeration value="PLN"/>
```

```
    <xs:enumeration value="RON"/>
```

```
    <xs:enumeration value="SEK"/>
```

```
    <xs:enumeration value="USD"/>
```

```
    <xs:enumeration value="TRY"/>
```

```
  </xs:restriction>
```

```
</xs:simpleType>
```

```
<xs:simpleType name="unitType">
```

```
  <xs:restriction base="xs:string">
```

```
    <xs:enumeration value="GWh"/>
```

```
    <xs:enumeration value="KWh"/>
```

```
    <xs:enumeration value="MWh"/>
```

```

    <xs:enumeration value="cm"/>
    <xs:enumeration value="GJ"/>
    <xs:enumeration value="MMBtu"/>
    <xs:enumeration value="Therm"/>
    <xs:enumeration value="Btu"/>
  </xs:restriction>
</xs:simpleType>

```

- * Do you agree with the proposed implementation in the schema of the reporting of the Index value?
- Agree
 - Don't agree
 - No opinion

Data Field (49) Price currency and unit

Reporting requirements:

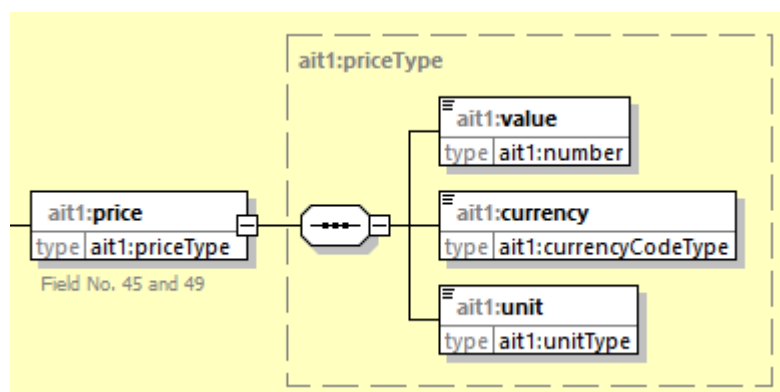
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM. The proposed requirements shall be consulted together with those described under Data Field (45) Price.

Respondents are invited to propose which other currency and unit shall be added to the list.

- * Do you agree with the proposed guidance for the reporting of the Price currency and unit?
- Agree
 - Don't agree
 - No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:simpleType name="currencyCodeType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="GBX"/>
    <xs:enumeration value="CHF"/>
    <xs:enumeration value="CZK"/>
    <xs:enumeration value="DKK"/>
    <xs:enumeration value="EUR"/>
    <xs:enumeration value="GBP"/>
    <xs:enumeration value="HUF"/>
    <xs:enumeration value="ISK"/>
    <xs:enumeration value="NOK"/>
    <xs:enumeration value="PCT"/>
    <xs:enumeration value="PLN"/>
    <xs:enumeration value="RON"/>
    <xs:enumeration value="SEK"/>
    <xs:enumeration value="USD"/>
    <xs:enumeration value="TRY"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="unitType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="GWh"/>
    <xs:enumeration value="KWh"/>
    <xs:enumeration value="MWh"/>
    <xs:enumeration value="cm"/>
    <xs:enumeration value="GJ"/>
    <xs:enumeration value="MMBtu"/>
    <xs:enumeration value="Therm"/>
    <xs:enumeration value="Btu"/>
  </xs:restriction>
</xs:simpleType>
```

- * Do you agree with the proposed implementation in the schema of the reporting of the Price currency and unit?
- Agree
 - Don't agree
 - No opinion

Data Field (50) Notional amount

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

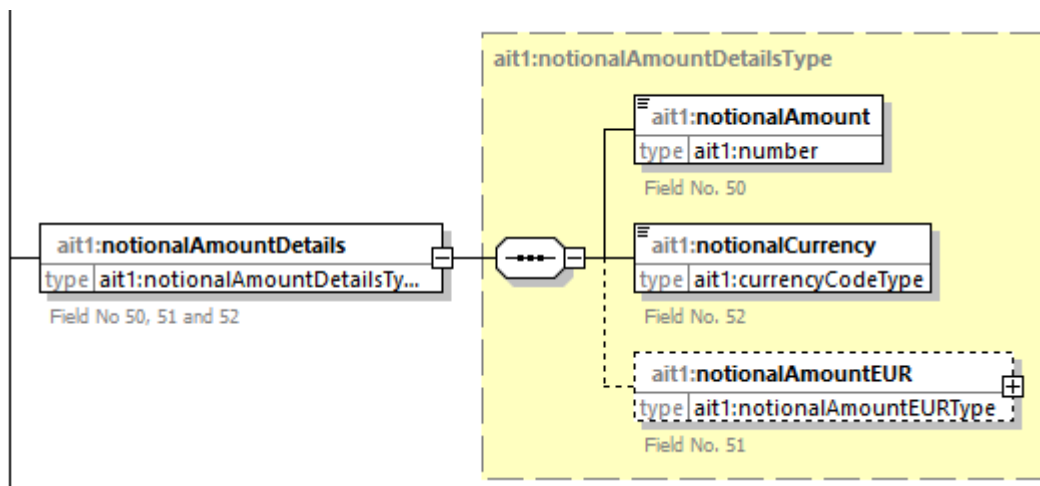
The proposed requirements shall be consulted together with those described under Data Field (45) Price.

* Do you agree with the proposed guidance for the reporting of the Notional amount?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="notionalAmountDetails" type="ait1:notionalAmountDetailsType">
  <xs:annotation>
    <xs:documentation>Field No 50, 51 and 52</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:element name="notionalAmount" type="ait1:number">
  <xs:annotation>
    <xs:documentation>Field No. 50</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="number">
```

```

<xs:restriction base="xs:decimal">
  <xs:totalDigits value="20"/>
  <xs:fractionDigits value="5"/>
</xs:restriction>
</xs:simpleType>

```

* Do you agree with the proposed implementation in the schema of the reporting of the Notional amount?

- Agree
- Don't agree
- No opinion

Data Field (51) Notional amount in EUR

Reporting guidance:

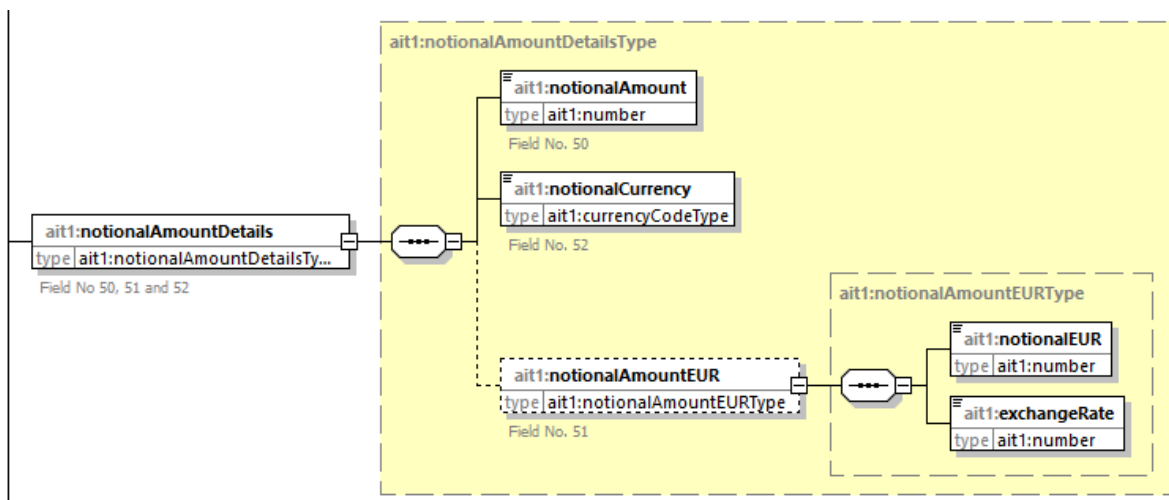
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Notional amount in EUR?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="notionalAmountEUR" type="ait1:notionalAmountEURType" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 51</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:complexType name="notionalAmountEURType">
  <xs:sequence>
    <xs:element name="notionalEUR" type="ait1:number"/>
    <xs:element name="exchangeRate" type="ait1:number"/>
  </xs:sequence>
</xs:complexType>
```

```
<xs:simpleType name="number">
  <xs:restriction base="xs:decimal">
    <xs:totalDigits value="20"/>
    <xs:fractionDigits value="5"/>
  </xs:restriction>
</xs:simpleType>
```

- * Do you agree with the proposed implementation in the schema of the reporting of the Notional amount in EUR?
- Agree
 - Don't agree
 - No opinion

Data Field (52) Notional currency

Reporting requirements:

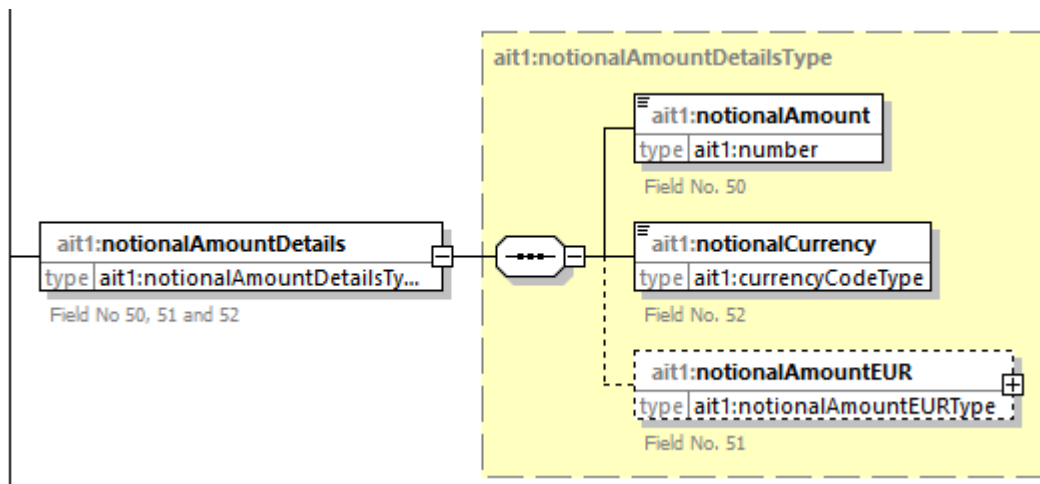
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to propose which other currency shall be added to the list.

- * Do you agree with the proposed guidance for the reporting of the Notional currency?
- Agree
 - Don't agree
 - No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="notionalCurrency" type="ait1:currencyCodeType">
  <xs:annotation>
    <xs:documentation>Field No. 52</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="currencyCodeType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="GBX"/>
    <xs:enumeration value="CHF"/>
    <xs:enumeration value="CZK"/>
    <xs:enumeration value="DKK"/>
    <xs:enumeration value="EUR"/>
    <xs:enumeration value="GBP"/>
    <xs:enumeration value="HUF"/>
    <xs:enumeration value="ISK"/>
    <xs:enumeration value="NOK"/>
    <xs:enumeration value="PCT"/>
    <xs:enumeration value="PLN"/>
    <xs:enumeration value="RON"/>
    <xs:enumeration value="SEK"/>
    <xs:enumeration value="USD"/>
    <xs:enumeration value="TRY"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Notional currency?

- Agree
- Don't agree
- No opinion

Data Field (54) Total notional contract quantity

Reporting requirements:

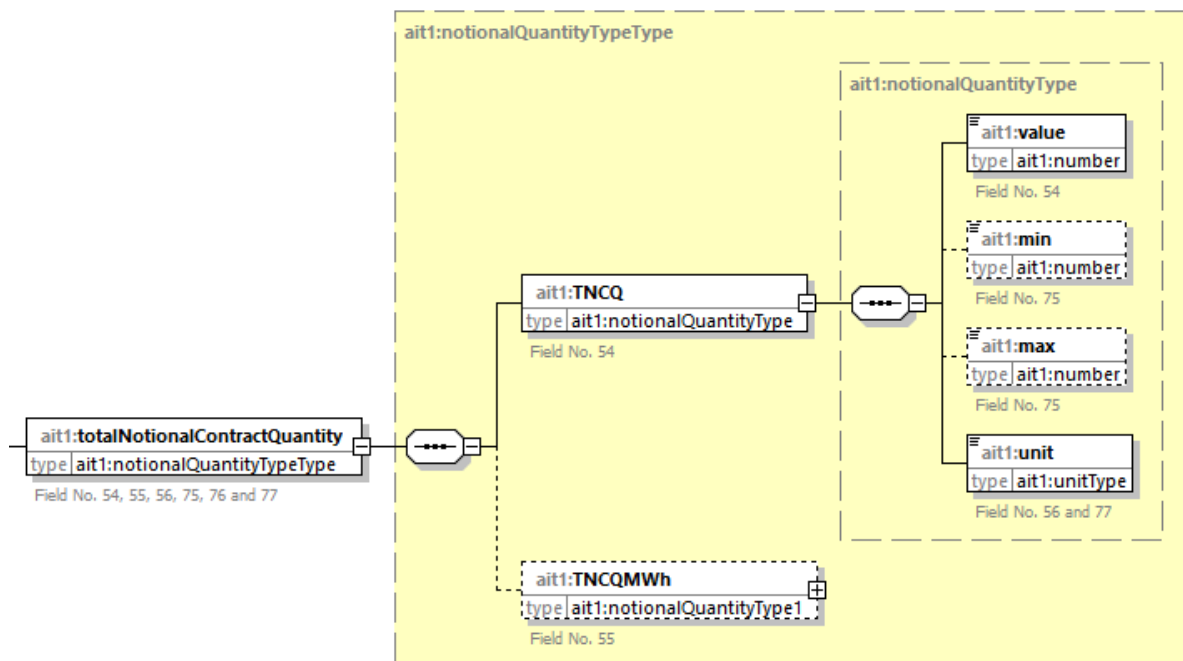
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Total notional contract quantity?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="totalNotionalContractQuantity" type="ait1:notionalQuantityTypeType" minOccurs="1">
  <xs:annotation>
```

```
<xs:documentation>Field No. 54, 55, 56, 75, 76 and 77</xs:documentation>
</xs:annotation>
</xs:element>
```

```
<xs:element name="TNCQ" type="ait1:notionalQuantityType">
  <xs:annotation>
    <xs:documentation>Field No. 54</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:element name="value" type="ait1:number">
  <xs:annotation>
    <xs:documentation>Field No. 54</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="number">
  <xs:restriction base="xs:decimal">
    <xs:totalDigits value="20"/>
    <xs:fractionDigits value="5"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Total notional contract quantity?

- Agree
- Don't agree
- No opinion

Data Field (55) Total notional contract quantity in MWh

Reporting requirements:

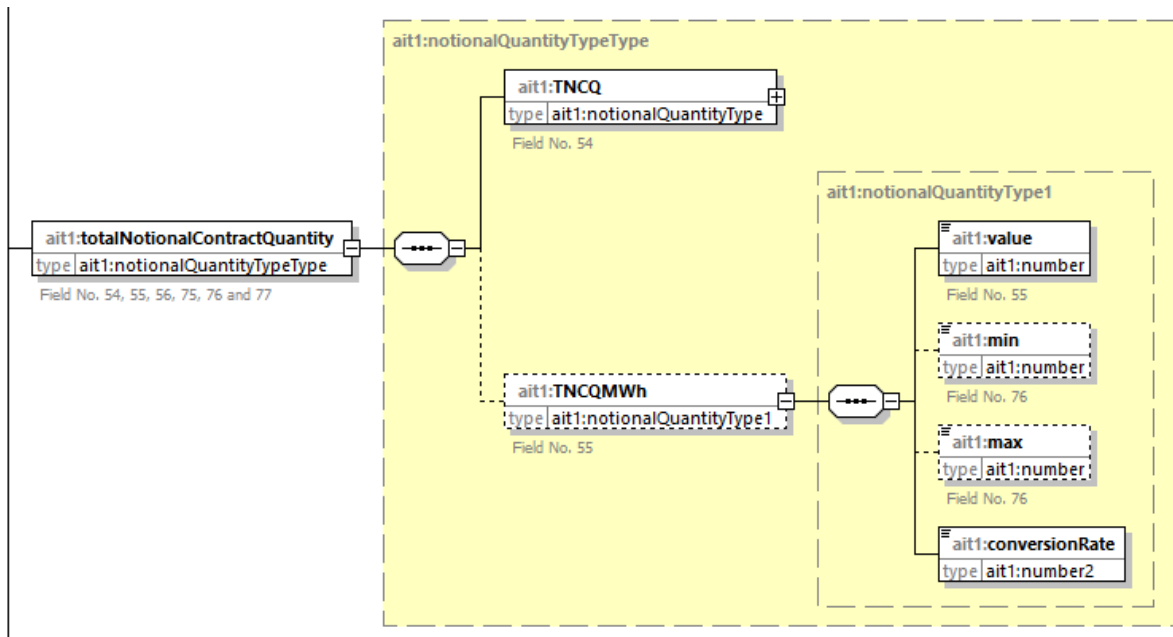
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Total notional contract quantity in MWh?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="totalNotionalContractQuantity" type="ait1:notionalQuantityType" minOccurs="1">
  <xs:annotation>
    <xs:documentation>Field No. 54, 55, 56, 75, 76 and 77</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:element name="TNCQMWh" type="ait1:notionalQuantityType1" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 55</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:element name="value" type="ait1:number">
  <xs:annotation>
    <xs:documentation>Field No. 55</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="number">
  <xs:restriction base="xs:decimal">
    <xs:totalDigits value="20"/>
    <xs:fractionDigits value="5"/>
  </xs:restriction>
</xs:simpleType>
```

</xs:restriction>
</xs:simpleType>

* Do you agree with the proposed implementation in the schema of the reporting of the Total notional contract quantity in MWh?

- Agree
- Don't agree
- No opinion

Data Field (56) Quantity unit for field 53 and 54

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

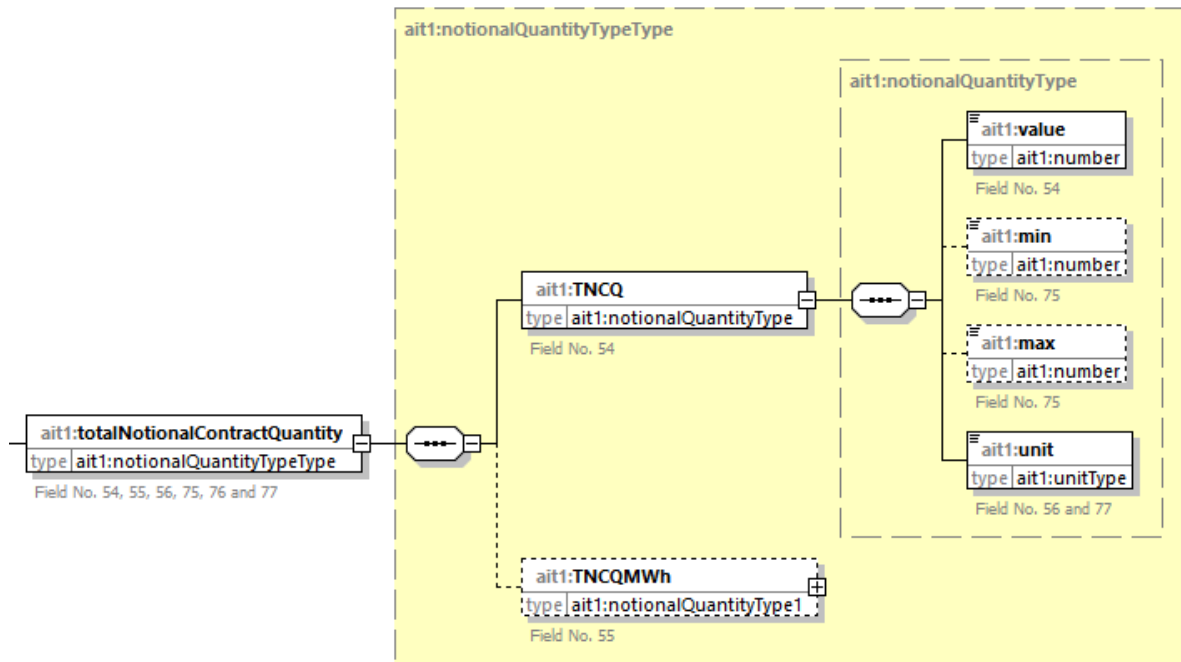
Respondents are invited to indicate in their feedback which other unit shall be added to the list.

* Do you agree with the proposed guidance for the reporting of the Quantity unit for field 53 and 54?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="unit" type="ait1:unitType">
  <xs:annotation>
    <xs:documentation>Field No. 56 and 77</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="unitType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="GWh"/>
    <xs:enumeration value="KWh"/>
    <xs:enumeration value="MWh"/>
    <xs:enumeration value="cm"/>
    <xs:enumeration value="GJ"/>
    <xs:enumeration value="MMBtu"/>
    <xs:enumeration value="Therm"/>
    <xs:enumeration value="Btu"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Quantity unit for field 53 and 54?

- Agree
- Don't agree
- No opinion

Data Field (57) Termination date

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Termination date?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:

ait1:terminationDate	
type	ait1:dateTimeRestriction
pattern	\d{4}(-\d{2}){2}T(0\d 1\d 2[0-3]...

Field No. 57

Schema attributes:

```
<xs:element name="terminationDate" type="ait1:dateTimeRestriction" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 57</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="dateTimeRestriction">
  <xs:restriction base="xs:dateTime">
    <xs:pattern value="\d{4}(-\d{2}){2}T(0\d|1\d|2[0-3]):[0-5]\d:[0-5]\d(\.\d{1,})?(Z|[+-]\d{2}:\d{2})"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Termination date?

- Agree
- Don't agree
- No opinion

Chapter 4.5 Details of LNG market and trade data

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

- Data Field (58) Type of LNG market data
 - Data Field (59) Annual delivery program
 - Data Field (60) Cargo swap
 - Data Field (61) Event type
 - Data Field (62) Loading facility
 - Data Field (63) Vessel identifier
 - Data Field (64) Delivery terms
 - Data Field (65) Portfolio contract price formula
 - Data Field (66) Special arrangement
 - Data Field (67) Reporter's information
 - Data Field (68) Business contact details
-

Data Field (58) Type of LNG market data

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

- * Do you agree with the proposed guidance for the reporting of the Type of LNG market data?
- Agree
 - Don't agree
 - No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="LNGMarketDataType" type="ait1:LNGMarketDataTypeType">
  <xs:annotation>
```

```
<xs:documentation>Field No. 58</xs:documentation>
</xs:annotation>
</xs:element>
```

```
<xs:simpleType name="LNGMarketDataTypeType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="TRS"/>
    <xs:enumeration value="BID"/>
    <xs:enumeration value="OFF"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Type of LNG market data?

- Agree
- Don't agree
- No opinion

Data Field (59) Annual delivery program

Reporting guidance:

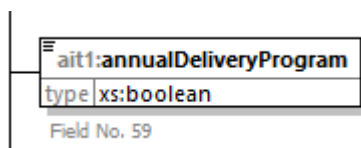
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Annual delivery program?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="annualDeliveryProgram" type="xs:boolean">
```

```
<xs:annotation>
  <xs:documentation>Field No. 59</xs:documentation>
</xs:annotation>
</xs:element>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Annual delivery program?

- Agree
- Don't agree
- No opinion

Data Field (60) Cargo swap

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Cargo swap?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="cargoSwap" type="xs:boolean">
  <xs:annotation>
    <xs:documentation>Field No. 60</xs:documentation>
  </xs:annotation>
</xs:element>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Cargo swap?

- Agree
- Don't agree

- No opinion

Data Field (61) Event type

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

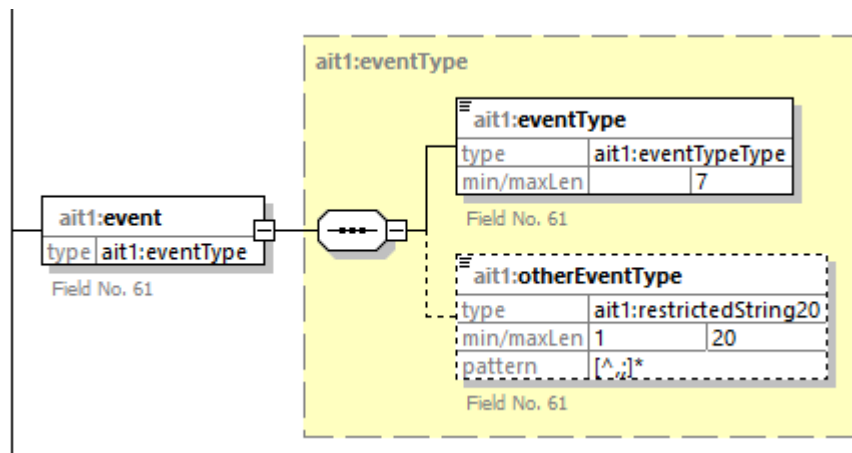
Respondents are invited to indicate in their feedback the additional event types not included in the list but deemed relevant for the reporting reflecting the real case scenarios.

* Do you agree with the proposed guidance for the reporting of the Event type?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```

<xs:element name="event" type="ait1:eventType">
  <xs:annotation>
    <xs:documentation>Field No. 61</xs:documentation>
  </xs:annotation>
</xs:element>
  
```

```

<xs:complexType name="eventType">
  
```

```
<xs:sequence>
  <xs:element name="eventType" type="ait1:eventTypeType">
    <xs:annotation>
      <xs:documentation>Field No. 61</xs:documentation>
    </xs:annotation>
  </xs:element>
  <xs:element name="otherEventType" type="ait1:restrictedString20" minOccurs="0">
    <xs:annotation>
      <xs:documentation>Field No. 61</xs:documentation>
    </xs:annotation>
  </xs:element>
</xs:sequence>
</xs:complexType>
```

```
<xs:simpleType name="eventTypeType">
  <xs:restriction base="xs:string">
    <xs:maxLength value="7"/>
    <xs:enumeration value="In-tank"/>
    <xs:enumeration value="Reload"/>
    <xs:enumeration value="Unload"/>
    <xs:enumeration value="Other"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="restrictedString20">
  <xs:restriction base="xs:string">
    <xs:maxLength value="20"/>
    <xs:minLength value="1"/>
    <xs:pattern value="^[^,;]*"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Event type?

- Agree
- Don't agree
- No opinion

Data Field (62) Loading facility

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to propose international industry standards as examples for the identification of loading terminals to be adopted by the reporting guidance.

* Do you agree with the proposed guidance for the reporting of the Loading facility?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:

ait1:loadingFacility	
type	ait1:restrictedString50
min/maxLen	1 50
pattern	[^,;]*

Field No. 62

Schema attributes:

```
<xs:element name="loadingFacility" type="ait1:restrictedString50" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 62</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="restrictedString50">
  <xs:restriction base="xs:string">
    <xs:maxLength value="50"/>
    <xs:minLength value="1"/>
    <xs:pattern value="[^,;]*"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Loading facility?

- Agree
- Don't agree
- No opinion

Data Field (63) Vessel Identifier

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Vessel identifier?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:

ait1:vesselId	
type	ait1:restrictedString20
min/maxLen	1 20
pattern	[^,;]*

Field No. 63

Schema attributes:

```
<xs:element name="vesselId" type="ait1:restrictedString20" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 63</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="restrictedString20">
  <xs:restriction base="xs:string">
    <xs:maxLength value="20"/>
    <xs:minLength value="1"/>
    <xs:pattern value="[^,;]*"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Vessel identifier?

- Agree
- Don't agree
- No opinion

Data Field (64) Delivery terms

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to indicate in their feedback the additional delivery terms not included in the list but deemed relevant for the reporting reflecting real case scenarios.

* Do you agree with the proposed guidance for the reporting of the Delivery terms?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:

ait1:deliveryTerms	
type	ait1:deliveryTermsType
min/maxLen	3

Field No. 64

ait1:otherDeliveryTerms	
type	ait1:restrictedString20
min/maxLen	1 20
pattern	[^,]*

Field No. 64

Schema attributes:

```
<xs:element name="deliveryTerms" type="ait1:deliveryTermsType">
  <xs:annotation>
    <xs:documentation>Field No. 64</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:element name="otherDeliveryTerms" type="ait1:restrictedString20" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 64</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="deliveryTermsType">
  <xs:restriction base="xs:string">
    <xs:maxLength value="3"/>
    <xs:enumeration value="DES"/>
    <xs:enumeration value="FOB"/>
    <xs:enumeration value="OTH"/>
  </xs:restriction>
</xs:simpleType>
```

```
<xs:simpleType name="restrictedString20">
  <xs:restriction base="xs:string">
    <xs:maxLength value="20"/>
    <xs:minLength value="1"/>
    <xs:pattern value="^[^,;]*"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Delivery terms?

- Agree
- Don't agree
- No opinion

Data Field (65) Portfolio contract price formula

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Portfolio contract price formula?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:

ait1:portfolioContractPriceFormula	
type	ait1:restrictedString1000
min/maxLen	1 1000
pattern	[^,;]*

Field No. 65

Schema attributes:

```
<xs:element name="portfolioContractPriceFormula" type="ait1:restrictedString1000" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 65</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="restrictedString1000">
  <xs:restriction base="xs:string">
    <xs:maxLength value="1000"/>
    <xs:minLength value="1"/>
    <xs:pattern value="[^,;]*"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Portfolio contract price formula?

- Agree
- Don't agree
- No opinion

Data Field (66) Special arrangement

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Special arrangement?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:

ait1:specialArrangement	
type	ait1:restrictedString1000
min/maxLen	1 1000
pattern	[^,;]*

Field No. 66

Schema attributes:

```
<xs:element name="specialArrangement" type="ait1:restrictedString1000" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 66</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="restrictedString1000">
  <xs:restriction base="xs:string">
    <xs:maxLength value="1000"/>
    <xs:minLength value="1"/>
    <xs:pattern value="[^,;]*"/>
  </xs:restriction>
</xs:simpleType>
```

- * Do you agree with the proposed implementation in the schema of the reporting of the Special arrangement?
- Agree
 - Don't agree
 - No opinion

Data Field (67) Reporter's information

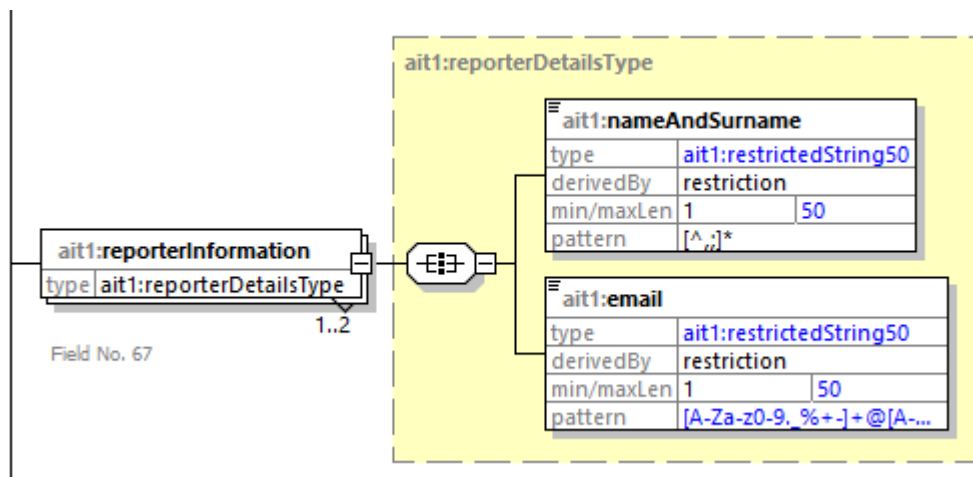
Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

- * Do you agree with the proposed guidance for the reporting of the Reporter's information?
- Agree
 - Don't agree
 - No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="reporterInformation" type="ait1:reporterDetailsType" maxOccurs="2">
  <xs:annotation>
    <xs:documentation>Field No. 67</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:complexType name="reporterDetailsType">
  <xs:all>
    <xs:element name="nameAndSurname">
      <xs:simpleType>
        <xs:restriction base="ait1:restrictedString50">
          <xs:maxLength value="50"/>
        </xs:restriction>
      </xs:simpleType>
    </xs:element>
    <xs:element name="email">
      <xs:simpleType>
        <xs:restriction base="ait1:restrictedString50">
          <xs:maxLength value="50"/>
          <xs:pattern value="[A-Za-z0-9._%+-]+@[A-Za-z0-9.-]+\.[A-Za-z]{2,}"/>
        </xs:restriction>
      </xs:simpleType>
    </xs:element>
  </xs:all>
</xs:complexType>
```

- * Do you agree with the proposed implementation in the schema of the reporting of the Reporter's information?
 - Agree
 - Don't agree
 - No opinion

Data Field (68) Business contact details

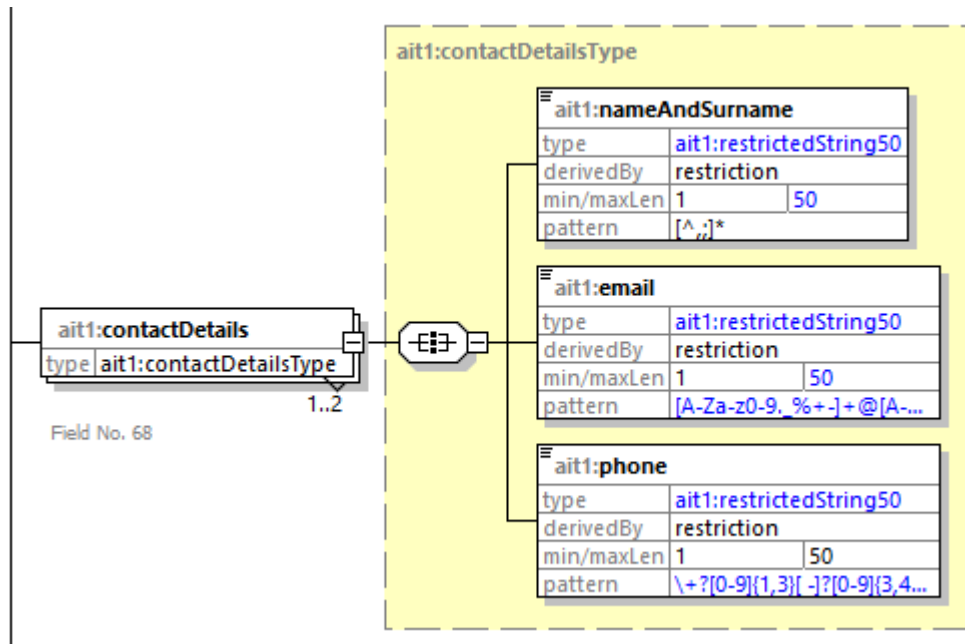
Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

- * Do you agree with the proposed guidance for the reporting of the Business contact details?
 - Agree
 - Don't agree
 - No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="contactDetails" type="ait1:contactDetailsType" maxOccurs="2">
  <xs:annotation>
    <xs:documentation>Field No. 68</xs:documentation>
  </xs:annotation>
</xs:element>
```

```

    </xs:annotation>
</xs:element>

<xs:complexType name="contactDetailsType">
  <xs:all>
    <xs:element name="nameAndSurname">
      <xs:simpleType>
        <xs:restriction base="ait1:restrictedString50">
          <xs:maxLength value="50"/>
        </xs:restriction>
      </xs:simpleType>
    </xs:element>
    <xs:element name="email">
      <xs:simpleType>
        <xs:restriction base="ait1:restrictedString50">
          <xs:maxLength value="50"/>
          <xs:pattern value="[A-Za-z0-9._%+-]+@[A-Za-z0-9.-]+\.[A-Za-z]{2,}"/>
          <xs:pattern value=""/>
        </xs:restriction>
      </xs:simpleType>
    </xs:element>
    <xs:element name="phone">
      <xs:simpleType>
        <xs:restriction base="ait1:restrictedString50">
          <xs:pattern value="\+?[0-9]{1,3}[ -]?[0-9]{3,4}[ -]?[0-9]{3,4}[ -]?[0-9]{3,6}"/>
        </xs:restriction>
      </xs:simpleType>
    </xs:element>
  </xs:all>
</xs:complexType>

```

* Do you agree with the proposed implementation in the schema of the reporting of the Business contact details?

- Agree
- Don't agree
- No opinion

Chapter 4.6 Optionality details

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

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

- Data Field (76) Minimum/Maximum total notional contract quantity in MWh
- Data Field (77) Quantity unit for fields 75 and 76

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

Reporting guidance:

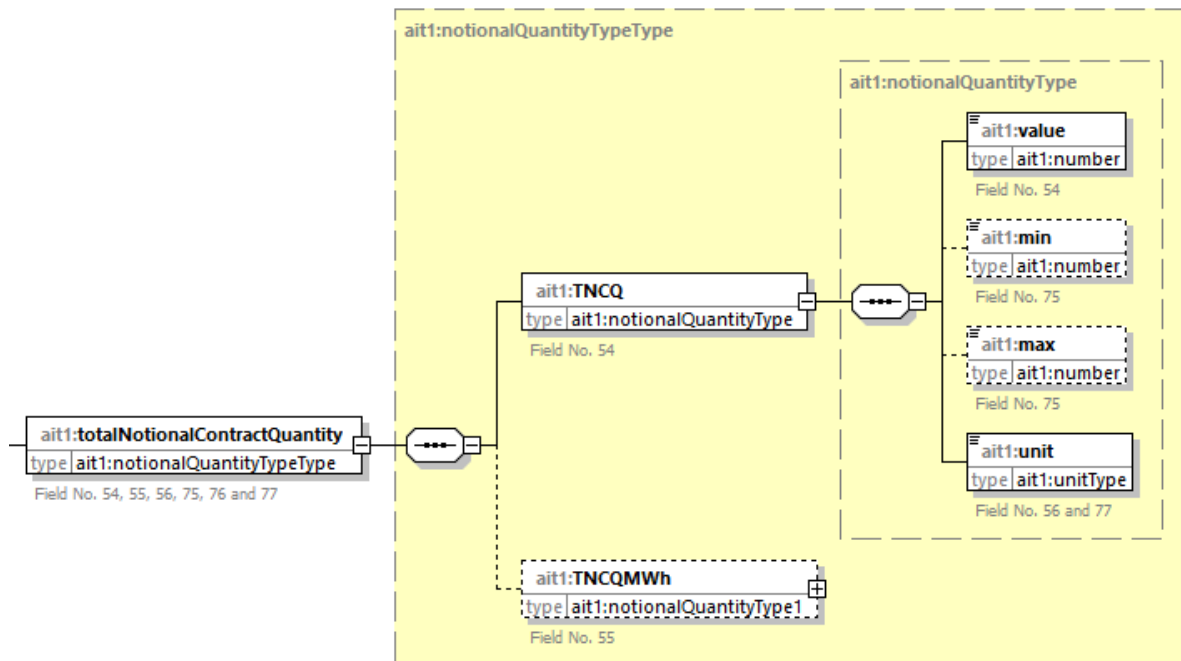
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

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

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="min" type="ait1:number" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 75</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
</xs:annotation>
</xs:element>

<xs:element name="max" type="ait1:number" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 75</xs:documentation>
  </xs:annotation>
</xs:element>

<xs:simpleType name="number">
  <xs:restriction base="xs:decimal">
    <xs:totalDigits value="20"/>
    <xs:fractionDigits value="5"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Minimum/Maximum total notional contract quantity?

- Agree
- Don't agree
- No opinion

Data Field (76) Minimum/Maximum total notional contract quantity in MWh

Reporting guidance:

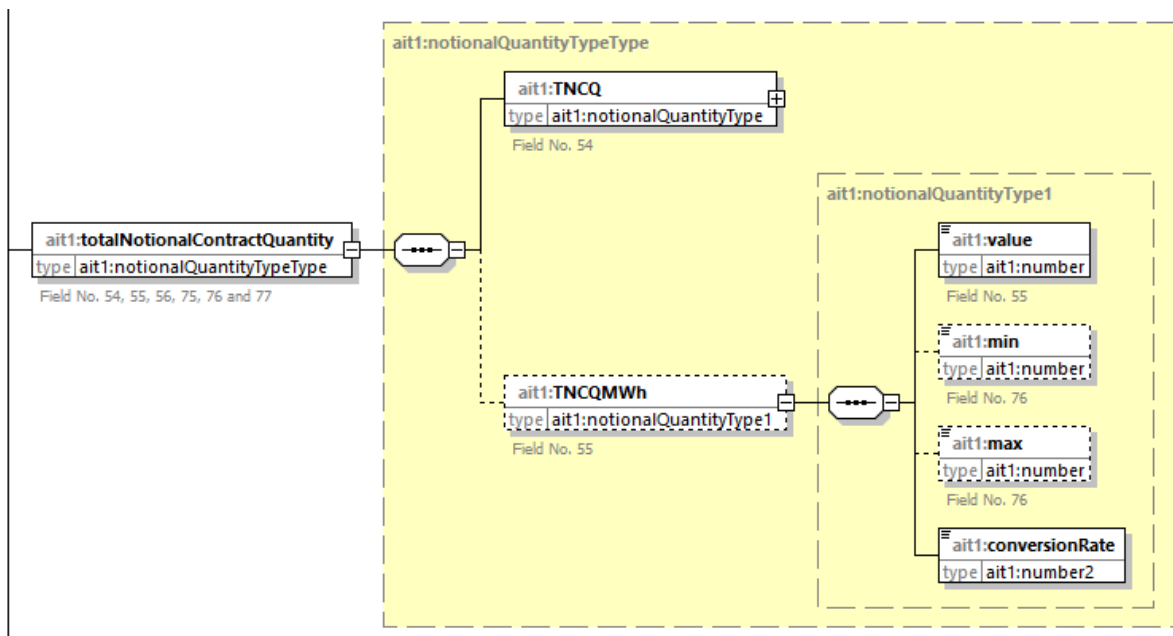
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Minimum/Maximum total notional contract quantity in MWh?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="min" type="ait1:number" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 76</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:element name="max" type="ait1:number" minOccurs="0">
  <xs:annotation>
    <xs:documentation>Field No. 76</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="number">
  <xs:restriction base="xs:decimal">
    <xs:totalDigits value="20"/>
    <xs:fractionDigits value="5"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Minimum/Maximum total notional contract quantity in MWh?

- Agree
- Don't agree
- No opinion

Data Field (77) Quantity unit for fields 75 and 76

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

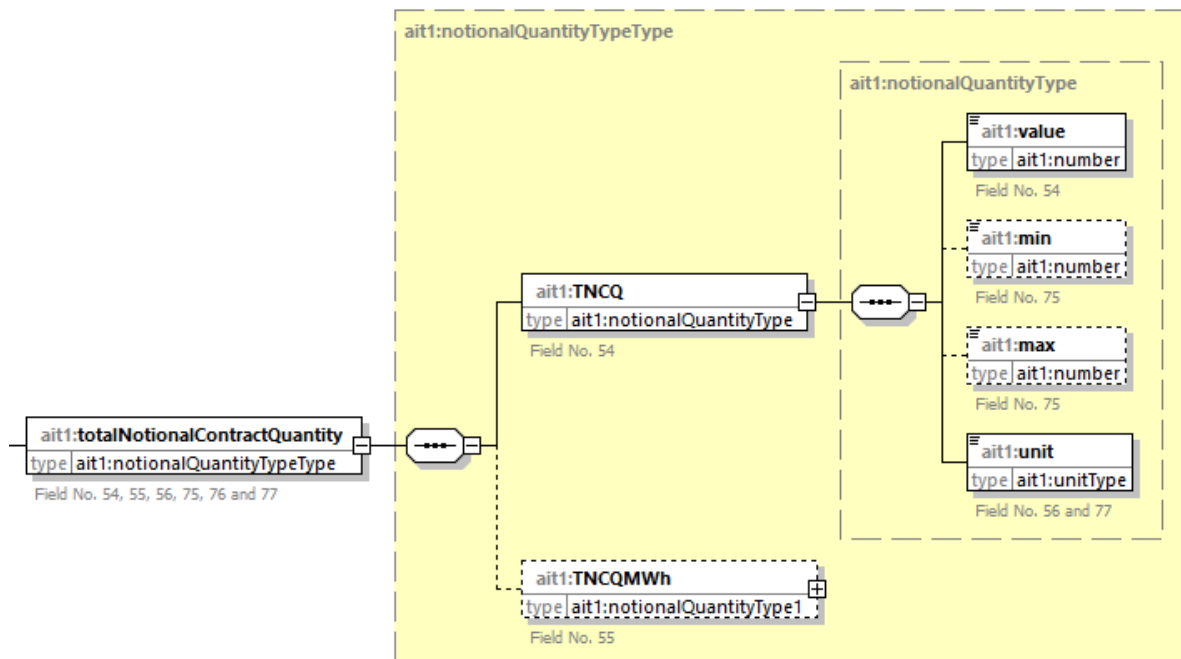
Respondents are invited to indicate in their feedback which other unit shall be added to the list.

* Do you agree with the proposed guidance for the reporting of the Quantity unit for fields 75 and 76?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```

<xs:element name="unit" type="ait1:unitType">
  <xs:annotation>
    <xs:documentation>Field No. 56 and 77</xs:documentation>
  </xs:annotation>
</xs:element>
  
```

```
<xs:simpleType name="unitType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="GWh"/>
    <xs:enumeration value="KWh"/>
    <xs:enumeration value="MWh"/>
    <xs:enumeration value="cm"/>
    <xs:enumeration value="GJ"/>
    <xs:enumeration value="MMBtu"/>
    <xs:enumeration value="Therm"/>
    <xs:enumeration value="Btu"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Quantity unit for fields 75 and 76?

- Agree
- Don't agree
- No opinion

Delivery profile

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

- Data Field (78) Delivery point or zone
- Data Field (79) Delivery start date
- Data Field (80) Delivery end date

Data Field (78) Delivery point or zone

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Delivery point or zone?

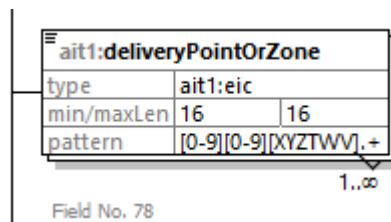
- Agree
- Don't agree
- No opinion

* If not agreed, please provide an alternative:

The current description of Field 78 appears inconsistent and risks adding unnecessary complexity in practice. Combining EIC codes with additional identifiers such as EAN codes for local connection points creates overlapping requirements that do not appear to serve a clear purpose in terms of the underlying reporting objective. We would suggest streamlining this field to EIC W codes only, which already provide sufficient granularity and consistency for identifying delivery points and market areas.

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="deliveryPointOrZone" type="ait1:eic" maxOccurs="unbounded">
  <xs:annotation>
    <xs:documentation>Field No. 78</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="eic">
  <xs:restriction base="xs:string">
    <xs:maxLength value="16"/>
    <xs:minLength value="16"/>
    <xs:pattern value="[0-9][0-9][XYZTWV].+"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Delivery point or zone?

- Agree
- Don't agree
- No opinion

Data Field (79) Delivery start date

Reporting guidance:

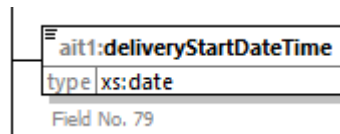
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Delivery start date?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="deliveryStartDateTime" type="xs:date">  
  <xs:annotation>  
    <xs:documentation>Field No. 79</xs:documentation>  
  </xs:annotation>  
</xs:element>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Delivery start date?

- Agree
- Don't agree
- No opinion

Data Field (80) Delivery end date

Reporting guidance:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Delivery end date?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="deliveryEndDateTime" type="xs:date">
  <xs:annotation>
    <xs:documentation>Field No. 80</xs:documentation>
  </xs:annotation>
</xs:element>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Delivery end date?

- Agree
- Don't agree
- No opinion

Chapter 4.8 Lifecycle information

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

- Data Field (88) Action type
- Real time reporting (schema field)

Data Field (88) Action type

Reporting guidance:

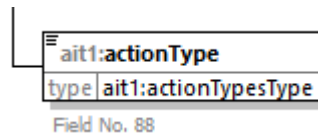
Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

* Do you agree with the proposed guidance for the reporting of the Action type?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="actionType" type="ait1:actionTypesType">
  <xs:annotation>
    <xs:documentation>Field No. 88</xs:documentation>
  </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="actionTypesType">
  <xs:restriction base="xs:string">
    <xs:enumeration value="N"/>
    <xs:enumeration value="M"/>
    <xs:enumeration value="E"/>
    <xs:enumeration value="C"/>
  </xs:restriction>
</xs:simpleType>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Action type?

- Agree
- Don't agree
- No opinion

<realTimeReporting>

Reporting requirements:

Please see the proposed reporting guidance, including the relevant lifecycle reporting requirements applicable for this data field in the draft Annex III to the TRUM.

Respondents are invited to provide feedback on the field <realTimeReporting> being a mandatory Boolean type in the electronic format. The field is proposed to be always reported in the LNG market data record including its lifecycle in order to clearly indicate whether the submitted record was meant to fulfil the real time reporting obligation for LNG market data (value 'true' is applicable) or the record represents a lifecycle event

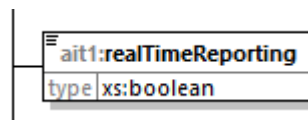
reportable in T+10 working days after the formal signing of the agreement. This also implies that when a market participant reports an LNG market data and this MP needs to send a modification to this record still on the same day (i.e. immediate modification of the real time data), the flag <realTimeReporting> is proposed to be reported with value 'true'.

* Do you agree with the proposed guidance for the reporting of the Real time reporting?

- Agree
- Don't agree
- No opinion

Electronic format:

Proposed structure:



Schema attributes:

```
<xs:element name="realTimeReporting" type="xs:boolean"/>
```

* Do you agree with the proposed implementation in the schema of the reporting of the Real time reporting?

- Agree
- Don't agree
- No opinion

Additional feedback

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

GENERAL OBSERVATIONS ON THE CONSULTATION PROCESS -

The current consultation wave comprises a very large number of parallel surveys covering extensive and highly detailed reporting requirements. This significantly limits the ability to provide comprehensive and fully developed feedback on each individual question within the available timeframe.

This concern is particularly relevant in the case of the present document, where the volume, scope, and technical complexity of the regulatory changes under consultation make it impractical to address every element with the level of analytical depth it deserves.

We would therefore strongly recommend that a second round of consultation be conducted on this specific document, in order to enable stakeholders to provide more meaningful and technically robust input on what represents a significant structural change to the reporting framework.

As a more technical observation on LNG Market Data and lifecycle reporting, about the section on Reporting of LNG market data and its lifecycle in Table 1, we have identified several issues in the current drafting of the

cardinality table. From a technical standpoint, the structure appears incorrect: even when reporting a lifecycle event with action type “M”, the fields previously submitted under action type “N” should remain mandatory. The current proposal, by relaxing these obligations, would create inconsistencies not only in the data reporting process but also in the application of validation rules. For these reasons, we strongly recommend revising the cardinality table to ensure full alignment with standard REMIT lifecycle logic and to avoid implementation issues once the new reporting obligations enter into force.

Please upload your file(s) using the following filename format [Name of the organisation you represent]
_REMIT T1LNG

**0370efc2-3d77-4b9b-a9b9-24ba65093053/ACER_REMIT_TRUM_ANNEX_III_v1.
0_DRAFT_v1_for_consultation_IOGP_comments.docx**

End of survey

Contact

remit.consultations@acer.europa.eu