



ACER consultation: Revision of REMIT reporting (Table 1)

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 standard contracts.

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

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

The consultation provides proposals for each regulatory novelty as follows:

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

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

"Additional feedback" (9).

How to complete the survey:

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

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

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

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

Contact and deadline:

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

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

Supporting material

Draft TRUM (v8.0):

[ACER REMIT TRUM v8.0 DRAFT v1 for consultation.docx](#)

Draft Annex I to the TRUM on reporting lifecycle events:

[ACER REMIT TRUM ANNEX I v1.0 DRAFT v1 for consultation.docx](#)

XML schema definition (XSD) for Table 1:

[draft1.0 REMITTable1 V4.xsd](#)

Chapter 2 of the revised TRUM

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

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

Chapter 2.1 Reporting scenarios related to standard contracts

Chapter 2.1.1 Ways of trading

- ☐ 2.1.1.1 Continuous trading within Single Intraday Coupling
- ☐ 2.1.1.2 Day-ahead auctions within SDAC
- ☐ 2.1.1.3 Intraday auctions within SIDC
- ☒ 2.1.1.4 Pay-as-bid auctions

2.1.1.4 Pay-as-bid auctions

We appreciate the clarification confirming that, in these circumstances, the TSO is considered to operate both as a market participant and as an OMP, by enabling the interaction of multiple third-party buying or selling interests in wholesale energy products, which may ultimately lead to the conclusion of a transaction. Given the complexities stemming from the REMIT II definition of OMPs, we strongly recommend that ACER provide explicit clarification in its REMIT guidance that, where transactions are concluded with TSOs or SSOs that facilitate multiple third-party interests, market participants involved may rely on such transactions being reported directly by the TSOs or SSOs. This reporting may be carried out either by the TSOs or SSOs themselves or, where execution takes place via an OMP platform used by the TSOs or SSOs, through order book reporting by that OMP.

Chapter 2.1.2 Trading arrangements

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

2.1.2.1 Direct Electronic Access

The proposed reporting approach for DEA transactions—especially in the presence of DEA chains—introduces a significant level of complexity, as it requires manual population of specific reporting fields that standard IT reporting systems are not typically designed to capture at such a granular level. Although we expect sub delegation arrangements to remain relatively limited in practice, the overall complexity of the framework is nonetheless likely to pose challenges for market participants in ensuring the accurate and timely reporting of DEA-related transactions.

2.1.2.4 Clearing / Trade registration

We support the proposal at page 14 of not expecting that the original trade and cleared trade are linked together in their REMIT reporting.

Chapter 2.1.3 Type of products and contracts

- ☐ 2.1.3.1 Trade at settlement
- ☒ 2.1.3.2 Local flexibility products
- ☐ 2.1.3.3 Gas within-day contracts

2.1.3.2 Local flexibility products

We understand and welcome the clarification that such platforms, whether operated directly by TSOs or by third parties, are considered OMPs. This is a positive development and should serve as a model for other market segments in which TSOs operate in their TSO capacity by facilitating competition among multiple market participants to meet the TSO's operational needs. Accordingly, this principle should be clarified more broadly and applied consistently to other TSO services and activities, such as balancing markets.

Chapter 6.1 Parties to the contract

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

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

Data Field (1) ID of the market participant

Reporting guidance:

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

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Electronic format:

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

Schema attributes:

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

Data Field (3) Liquidity provision activity (new)

Reporting guidance:

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

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

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

- ☐ Agree
☒ Do not agree
☐ No opinion

* If not agreed, please provide an alternative:

We would appreciate further clarification on whether, under REMIT, the notion of liquidity provision is intended to cover exclusively market making activities carried out within the framework of a formal liquidity provision agreement with the OMP. Under MiFID, this concept has a broader scope; however, the description provided in Annex Table 1 of the REMIT Implementing Regulation appears to be primarily focused on market making. In this context, the lack of alignment gives rise to practical uncertainties, particularly in determining which volume based incentive schemes should fall within the scope of the requirement. As previously noted, such ambiguity is likely to increase the reporting burden and may adversely affect data quality.

We would also like to highlight that liquidity provision arrangements beyond strict market making are frequently entered into with OMPs. The associated challenges are not limited to interpretative aspects but also extend to technical implementation. For instance, trading and execution systems (such as Trayport) would need to incorporate an additional REMIT specific field for liquidity provision, thus adding complexity in terms of system configuration, maintenance, and data processing. Consequently, diverging from the MiFID framework could entail significant implementation and ongoing operational efforts, particularly considering that liquidity provision agreements with OMPs are typically subject to annual renewal.

Electronic format:

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

Schema attributes:

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

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

- ☐ Agree
☐ Do not agree
☒ No opinion

Data Field (4) ID of the trader

Reporting guidance:

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

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

- ☐ Agree
☒ Do not agree
☐ No opinion

* If not agreed, please provide an alternative:

As already pointed out in previous interactions, for OTC transactions the trader is not always immediately identifiable, as negotiations are often conducted by both parties at a team or working group level. Further to that, we would like to point out that when data reporting is performed by one counterparty on behalf of the other, this information is not always available to the delegating counterparty. In order to improve data consistency, we suggest limiting the mandatory nature of this field exclusively to transactions executed on OMP.

With special reference to transactions on OMP, ACER states (p.32 TRUM) that data field (4) is considered mandatory, regardless of whether the execution or completion of the transaction involves algorithmic trading. In our opinion this field cannot be mandatory because i) according to the definition of algorithmic trading under REMIT, no human intervention is envisaged; ii) only in very limited cases, relating to specific OMPs (e.g. ICE), is it required for the algorithm to be monitored by a specifically identified trader; however, in ordinary circumstances this does not occur because the algorithm is monitored by a team and equipped with its own certificate.

We would also like to point out that this is not required under MiFIR, where either the Trader ID or the Algo ID is reported, but not both at the same time. This approach enables regulators to clearly distinguish between manual and algorithmic execution. In practice, while exchanges may have visibility over the responsible trader, this does not appear to be consistently implemented across all venues at present. As a result, introducing this requirement would likely entail significant implementation efforts and costs, particularly given the absence of established communication channels for sharing such information with OMPs.

Moreover, it is not always feasible to attribute an algorithm to a single individual, as complex algorithms are generally developed, operated, and maintained by dedicated teams. For this reason, we believe that the Trader ID should not be a mandatory field, and that it should instead be possible to indicate—through a standardised designation—that the algorithm is managed collectively by a team.

Electronic format:

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

Schema attributes:

```
<xs:element name="traderID" type="ait1:traderCode" minOccurs="0">
```

```
<xs:annotation>
  <xs:documentation>Field No. 4</xs:documentation>
</xs:annotation>
</xs:element>
```

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Data Field (5) Algorithm ID (new)

Reporting guidance:

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

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

- ☐ Agree
- ☒ Do not agree
- ☐ No opinion

* If not agreed, please provide an alternative:

On page 33 of the TRUM, ACER states that “the field is mandatory in case the trading activity related to the transaction to be reported involves limited or no human intervention.” Could you please clarify why ACER’s own definition of algorithmic trading (as outlined in the ACER Guidance) is not being applied here? Introducing a different definition risks creating confusion. Furthermore, the REMIT Regulation clearly defines algorithmic trading as involving no human intervention; therefore, the reference to “limited” human intervention in the TRUM should be removed.

Composition of the Algo ID:

We understand the general purpose behind this proposal but cannot support the construction approach as presented. The proposal goes well beyond the scope defined in the Annex of the Implementing Regulation, where the field is described as indicating “the identification code of the algorithm used for the placing or conclusion of the transaction.” The strategy element was explicitly removed during the consultation process of the IR, and this proposal effectively reintroduces it.

As a general principle, two distinct regulatory needs should be addressed through two separate fields. The

need to identify whether a transaction was executed by an algorithm or a natural person is a fundamentally different requirement from the need to understand the strategy underpinning the transaction. Conflating the two within a single field creates ambiguity and undermines the clarity the reporting framework is designed to deliver. The proposed prefix classification based on the "general purpose" of the algorithm is also simply not workable in practice. Algorithms are not monolithic constructs with a single well-defined objective. Each one operates according to its own specific logic, typically combining multiple elements — asset management, risk management, execution optimisation and others — calibrated to the market participant's specific activity and risk appetite. The practical result of adopting this classification would be to send misleading signals to surveillance systems, with the "Other" category becoming the default choice in the vast majority of cases, given that most algorithms embed a mix of strategies that resist reduction to any single predefined label.

Electronic format:

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

Schema attributes:

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

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

Reporting guidance:

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

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

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

- ☐ Agree
☒ Do not agree
☐ No opinion

* If not agreed, please provide an alternative:

The proposed reporting framework for DEA transactions, particularly in cases involving a DEA chain, introduces a high degree of complexity. It requires manual completion of specific reporting fields, as standard IT reporting systems are not typically designed to capture such granular information.

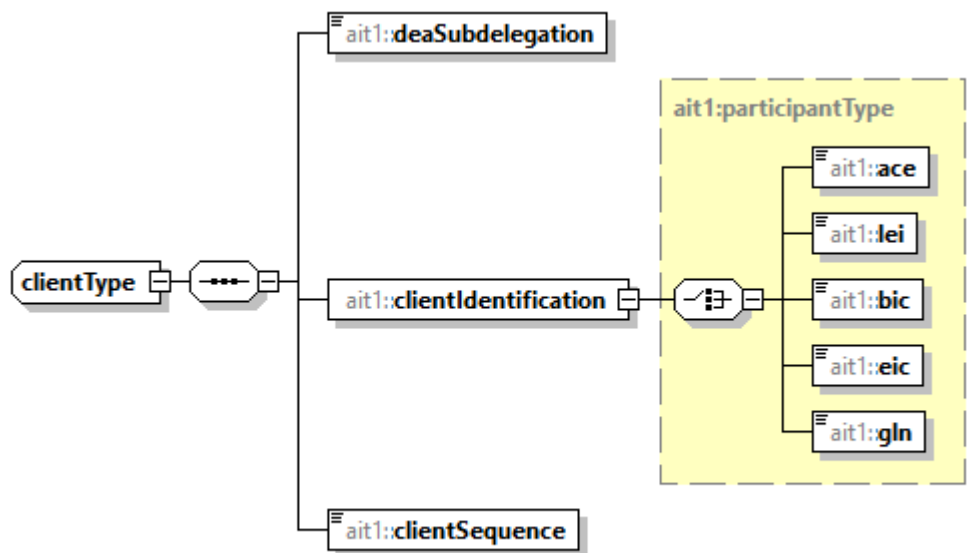
Although sub-delegation arrangements are generally expected to remain limited in practice, the overall complexity of the framework is nonetheless likely to create challenges for market participants in ensuring the accurate and timely reporting of DEA-related transactions.

Given that the relevant information is usually only available to one side of the transaction, we assume that the counterparty not subject to any DEA arrangement should not be required to populate DEA-related data fields. Furthermore, we recommend including an additional set of reporting examples in Annex II, specifically addressing transactions involving DEA arrangements.

Electronic format:

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

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



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Schema attributes:

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

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Data Field (10) Beneficiary ID

Reporting guidance:

Please provide feedback on the reporting requirements for the reporting of final beneficiary. Respondents may

focus their feedback on transactions involving DEA.

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

- ☐ Agree
☒ Do not agree
☐ No opinion

* If not agreed, please provide an alternative:

We would like to point out that the identification of the beneficiary will only be feasible by the MP that has a relationship with the beneficiary. The other MP of the transaction will not be aware of any indication/update of the beneficiary as foreseen in 4.2.2.

Electronic format:

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

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

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

Reporting guidance:

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

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

- ☐ Agree
☒ Do not agree
☐ No opinion

* If not agreed, please provide an alternative:

The Direct Electronic Access component of this data field would benefit from further clarification. In typical DEA arrangements, the DEA provider retains the position arising from the trading activity carried out by its client. In the example provided, this would indicate that the DEA provider referenced in Data Field (1) is acting as principal vis à vis the transaction executed on the OMP, while the DEA client is reported under Data Field (9). Against this background, it remains unclear whether a separate transaction between the DEA provider and the DEA client is expected to be reported in order to reflect the underlying relationship, or whether the information captured within the original transaction report is deemed sufficient for reporting purposes.

Electronic format:

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

Schema attributes:

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

Chapter 6.2 Order details

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

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

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

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

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

Data Field (16) Order type

Reporting guidance:

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

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

- ☐ Agree
☐ Do not agree
☒ No opinion

Electronic format:

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

Schema attributes:

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

Data Field (18) Order status

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

- ☐ Agree
☐ Do not agree
☒ No opinion

Electronic format:

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

Schema attributes:

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

Data Field (21) Undisclosed volume

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Electronic format:

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

Schema attributes:

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

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

```

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

```

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

- ☐ Agree
☐ Do not agree
☒ No opinion

Chapter 6.3 Contract details

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

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

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

Reporting guidance:

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

Electronic format:

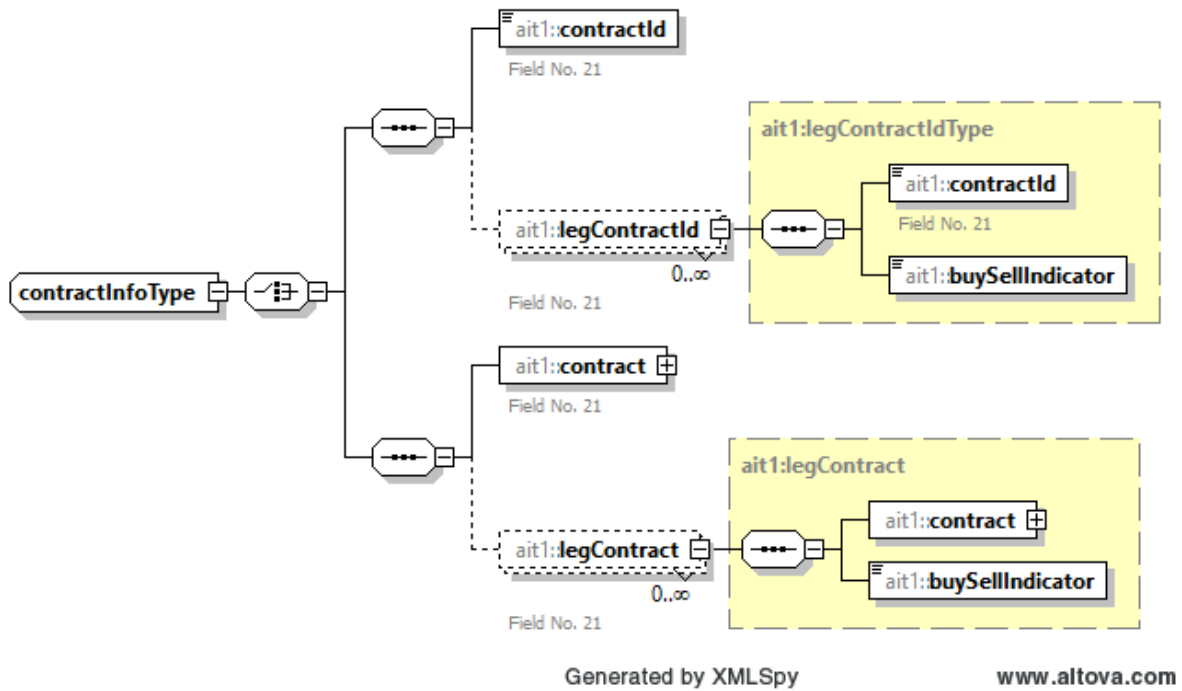
The *contractInfo* sub-sections within both the *OrderList* and *TradeList* sections of the schema are being simplified to limit redundancy. Here:

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

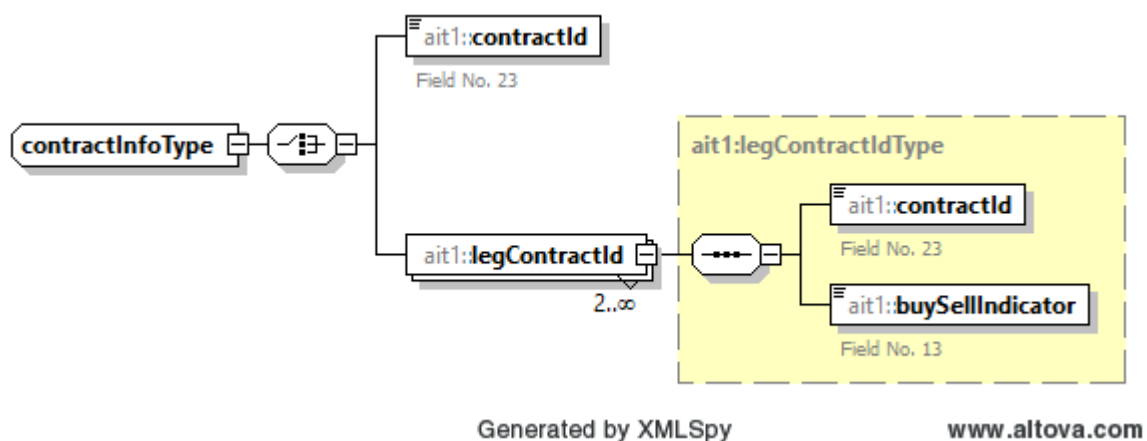
- The contractInfo fields within TradeList are being limited to the mandatory contractId field. The choice allowing for the reporting of additional contract details within sub-section TradeList is being removed.

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

Current structure of contractInfo fields:



Proposed structure of contractInfo fields:



Schema attributes:

```
<xs:complexType name="contractInfoType">
  <xs:choice>
    <xs:element name="contractId" type="ait1:contractIdType">
```

```

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

```

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

- ☐ Agree
☒ Do not agree
☐ No opinion

* If not agreed, please provide an alternative:

No comment on the proposed restructuring of the field. However please note that in Annex I to the TRUM on lifecycle events there is an error on this topic at page 15-16: it is reported that "Data Field (23) shall always be populated with the default value 'BILCONTRACT' in case of bilateral transactions and in any of their related lifecycle events.", which is an error. While on TRUM it is reported correctly.

Data Field (25) Contract type

Reporting guidance:

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

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

- ☐ Agree
☐ Do not agree
☒ No opinion

Electronic format:

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

Schema attributes:

```
<xs:element name="contractType" type="ait1:contractTypeType">
```

```

<xs:annotation>
  <xs:documentation>Field No. 25</xs:documentation>
</xs:annotation>
</xs:element>

```

Data fields related to fixing details:

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

Reporting guidance:

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

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

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

- ☐ Agree
☒ Do not agree
☐ No opinion

* If not agreed, please provide an alternative:

We would ask you to confirm that Tab 1 should always be an allowable option also in cases of trades with fixed quantities, regardless of whether the price is fixed, based on a simple indexation, or determined through a complex price formula. Our understanding, following the update of the table, is that this option is now permitted for standard contracts and should likewise be extended to non-standard contracts.

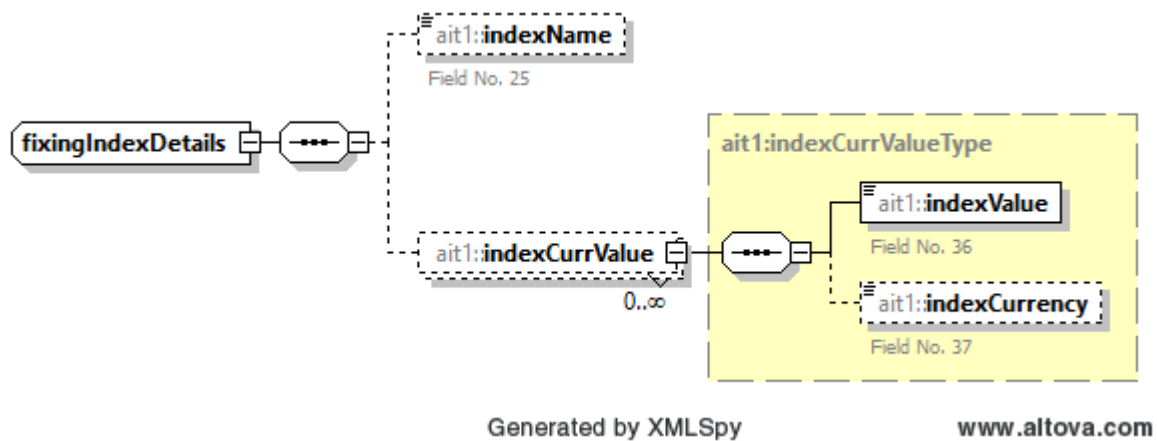
In this context, it would be appropriate to review the content of the relevant fields —particularly the “Price Formula” field and the “Fixing Index” field— with a view to enabling the accurate representation of complex pricing structures. In this regard, a clear definition of what constitutes a “complex price formula” would be highly beneficial to ensure a consistent and unambiguous distinction between transactions to be reported in Tab 1 and those to be reported in Tab 2.

Additionally, we would like to highlight that a naming convention should not be conflated with a list of indices. A naming convention represents a set of rules to be applied to publicly available indices, rather than being a list of indices in itself. We therefore request that this section be further detailed and clarified accordingly, in order to avoid any ambiguity in its practical application by reporting parties.

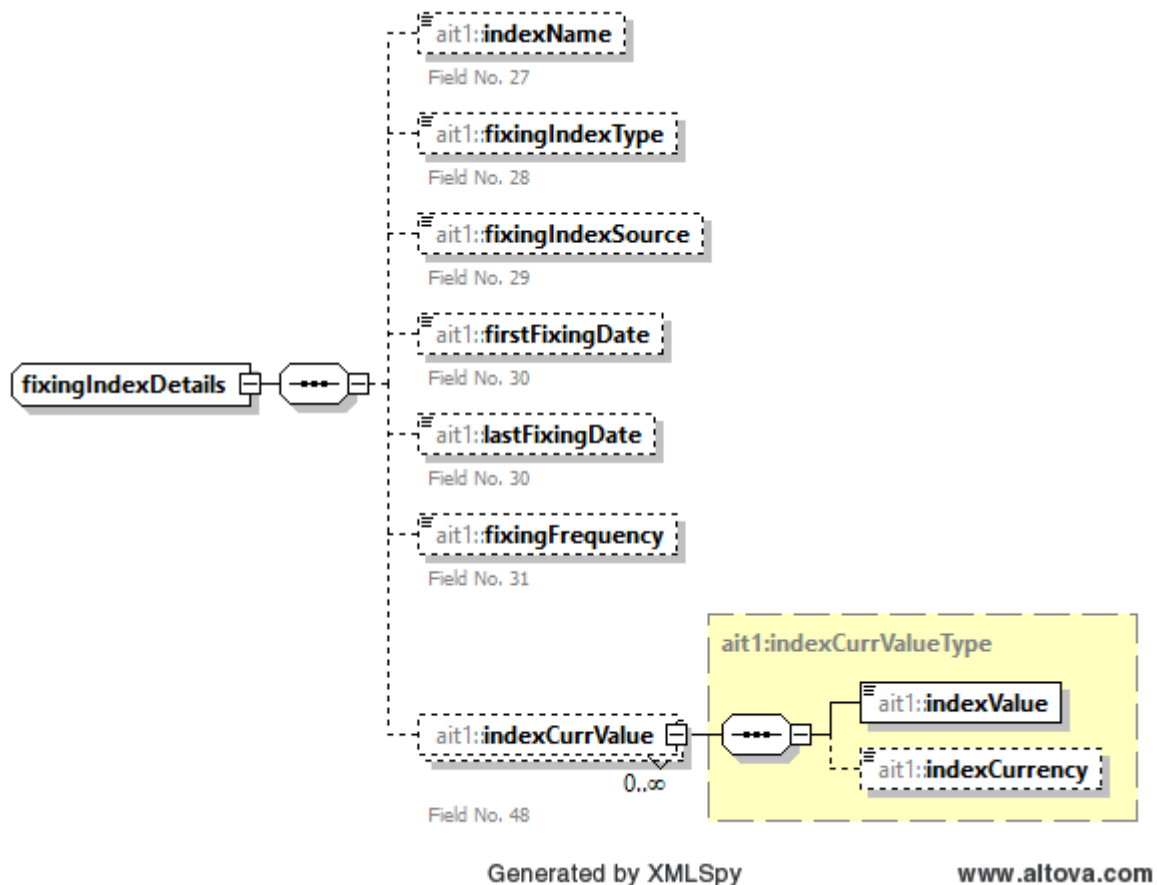
Electronic format:

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

Current structure for fixingIndex fields:



Proposed structure for fixingIndex fields:



Schema attributes:

```
<xs:complexType name="fixingIndexDetails">
  <xs:sequence>
    <xs:element name="indexName" type="ait1:fixingIndexType" minOccurs="0">
      <xs:annotation>
        <xs:documentation>Field No. 27</xs:documentation>
      </xs:annotation>
    </xs:element>
    <xs:element name="fixingIndexType" type="ait1:contractTypeType2" minOccurs="0">
      <xs:annotation>
        <xs:documentation>Field No. 28</xs:documentation>
      </xs:annotation>
    </xs:element>
    <xs:element name="fixingIndexSource" type="ait1:restrictedString" minOccurs="0">
      <xs:annotation>
        <xs:documentation>Field No. 29</xs:documentation>
      </xs:annotation>
    </xs:element>
    <xs:element name="firstFixingDate" type="xs:date" minOccurs="0">
      <xs:annotation>
        <xs:documentation>Field No. 30</xs:documentation>
      </xs:annotation>
    </xs:element>
    <xs:element name="lastFixingDate" type="xs:date" minOccurs="0">
      <xs:annotation>
        <xs:documentation>Field No. 30</xs:documentation>
      </xs:annotation>
    </xs:element>
    <xs:element name="fixingFrequency" type="ait1:frequencyType" minOccurs="0">
      <xs:annotation>
        <xs:documentation>Field No. 31</xs:documentation>
      </xs:annotation>
    </xs:element>
    <xs:element name="indexCurrValue" type="ait1:indexCurrValueType" minOccurs="0" maxOccurs="unbounded">
      <xs:annotation>
        <xs:documentation>Field No. 48</xs:documentation>
      </xs:annotation>
    </xs:element>
  </xs:sequence>
</xs:complexType>
```

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Data Field (32) Settlement method

Reporting guidance:

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

Revised list of accepted values:

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

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

- ☐ Agree
- ☒ Do not agree
- ☐ No opinion

* If not agreed, please provide an alternative:

We do not support the addition of "P_OP" e "C_OP" options, as in our opinion the existing O value is deemed adequate. Based on our understanding, including clarifications provided over the years by ACER, contracts for physical delivery (including those with take-or-pay clauses) are classified as physically settled. Furthermore, in cases where a contract allows for either physical settlement or cash settlement at the discretion of one party, there appears to be no need to specify the default settlement method in the absence of the option being exercised.

Electronic format:

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

Schema attributes:

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


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

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

Reporting guidance

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

Revised list of accepted values:

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

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

- ☐ Agree
☒ Do not agree
☐ No opinion

* If not agreed, please provide an alternative:

We do not support the introduction of this field, as it is not aligned with the REMIT framework. In addition, this type of information should be treated as static data and included in the OMP list, rather than adding further burden to Table 1 transaction reporting, which is already complex and resource-intensive.

Electronic format:

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

Schema attributes:

```
<xs:element name="typeOfTradingVenue" minOccurs="0">  
  <xs:annotation>  
    <xs:documentation>Field No. 34</xs:documentation>  
  </xs:annotation>  
  <xs:simpleType>  
    <xs:restriction base="ait1:typeOfTradingVenueType"/>  
  </xs:simpleType>  
</xs:element>
```

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

- ☐ Agree
☐ Do not agree
☒ No opinion

Chapter 6.4 Transaction details

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

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

Data Field (37) Transaction timestamp

Reporting guidance:

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

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

- ☐ Agree
☐ Do not agree
☒ No opinion

Electronic format:

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

Schema attributes:

```
<xs:element name="transactionTime" type="ait1:dateTimeRestriction">
```

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

Data Field (41) Voice-brokered

Reporting guidance:

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

Revised list of accepted values:

- On-Screen
- Off-Screen
- No

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Electronic format:

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

Schema attributes:

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

* Do you agree with the proposed schema implementation for field Voice-brokered?

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

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

Reporting guidance:

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

- Give-up
- Take-up

* Do you agree with the proposed reporting guidance for field Post-trade event?

- ☐ Agree
- ☒ Do not agree
- ☐ No opinion

* If not agreed, please provide an alternative:

We would like to receive confirmation that this field is not requested in case of takeover of the trade for M&A activities (i.e. takeover process currently managed through novation lifecycle event).

Electronic format:

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

Schema attributes:

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

* Do you agree with the proposed schema implementation for field Post-trade event?

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Data Field (43) Transaction type (new)

Reporting guidance:

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

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

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

- ☐ Agree
- ☒ Do not agree
- ☐ No opinion

* If not agreed, please provide an alternative:

We do not support the use of the term “wash trade,” as it carries negative connotations and is commonly associated with a manipulative practice as described by ACER in the REMIT Guidance and Guidance Note (1 /2017). A more neutral expression, such as “cross trade” or “balanced trade,” would be preferable. Additionally, for clarity and improved readability, we recommend explicitly stating that this requirement does not apply to OTC transactions.

Electronic format:

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

Schema attributes:

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Data Field (44) Bidding ID (new)

Reporting guidance:

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

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

- ☐ Agree
☐ Do not agree
☒ No opinion

Electronic format:

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

Schema attributes:

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

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

- ☐ Agree
☐ Do not agree
☒ No opinion

Data Field (45) Price

Data Field (46) Price formula (new)

Data Field (49) Price currency and unit

Reporting guidance:

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

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

Lifecycle reporting guidance (Annex I to the TRUM):

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

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

- ☐ Agree
- ☒ Do not agree
- ☐ No opinion

* If not agreed, please provide an alternative:

We would ask you to confirm that Tab 1 should be always an allowed choice also in case of trade with fixed quantity no matter if the price is fixed, with a simple indexation or with a complex price formula. Our understanding is that, given the update of the table, this new possibility would be allowed for standard contracts and that also for not standard contracts should be enabled.

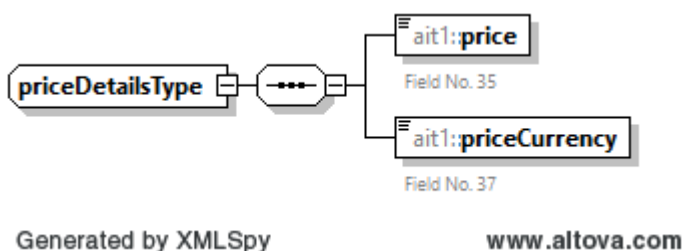
In this context, a review of the content of the relevant fields —particularly the “Price Formula” field— would be appropriate, with the aim of enabling the proper representation of complex pricing structures. In this respect, a clear definition of what constitutes a “complex price formula” would be highly beneficial, in order to ensure a consistent and unambiguous distinction between what should be reported in Tab 1 and what should instead be reported in Tab 2.

Electronic format:

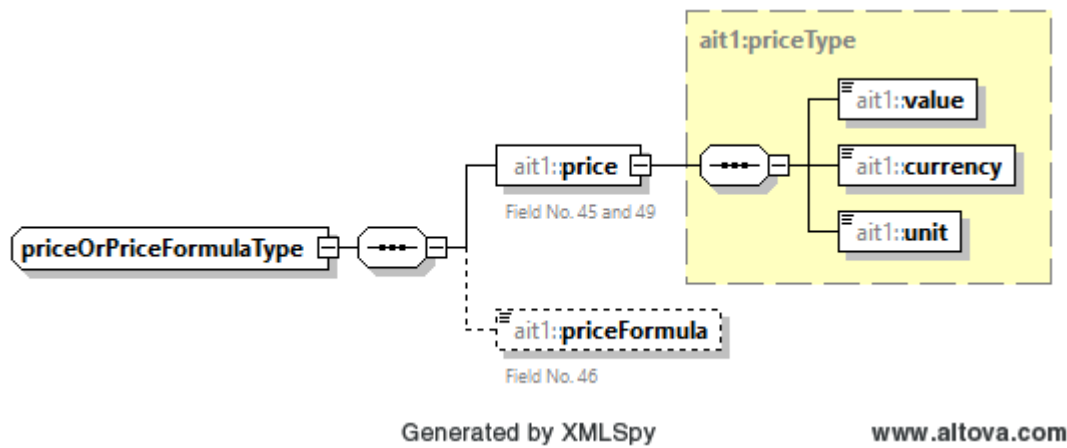
The fields in the priceDetails structure (price and priceCurrency) within the OrderList and TradeList sections of the existing schema have been restructured into a new priceOrPriceFormula structure. Here a sequence of two sub-elements has been introduced:

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

Current structure for priceDetails type:



Proposed structure for priceOrPriceFormula type:



Schema attributes:

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

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Data Field (53) Quantity/volume

Data Field (54) Total notional contract quantity

Lifecycle reporting guidance:

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

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

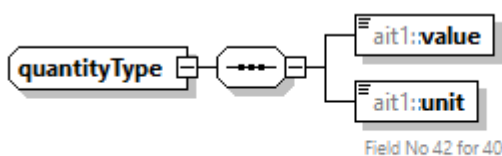
- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Electronic format:

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

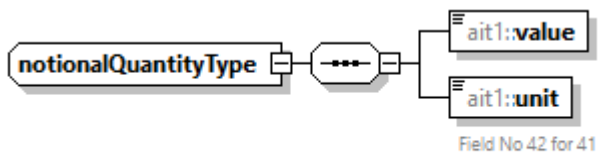
- OrderList:
 - fullRecordData sub-section: both quantity and totalNotionalContractQuantity are implemented as optional fields. The fields lead to a choice structure between:
 1. A sequence of three mandatory fields for the reporting of matched, visible and undisclosed quantities (value and unit).
 2.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

Current structure of quantity and totalNotionalContractQuantity types:



Generated by XMLSpy

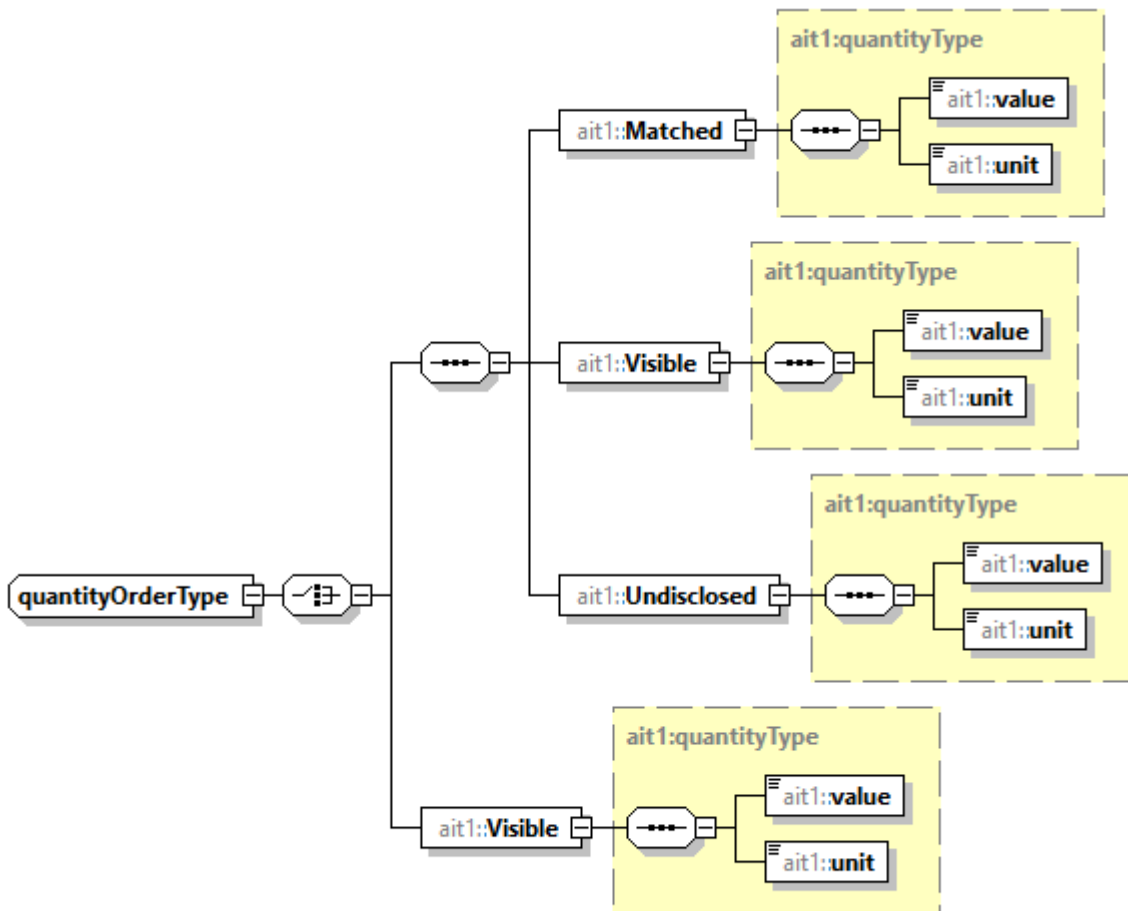
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Generated by XMLSpy

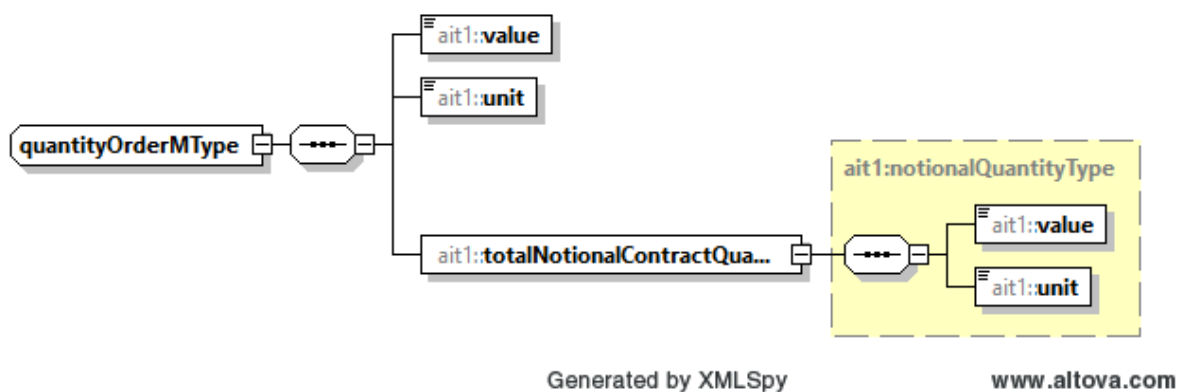
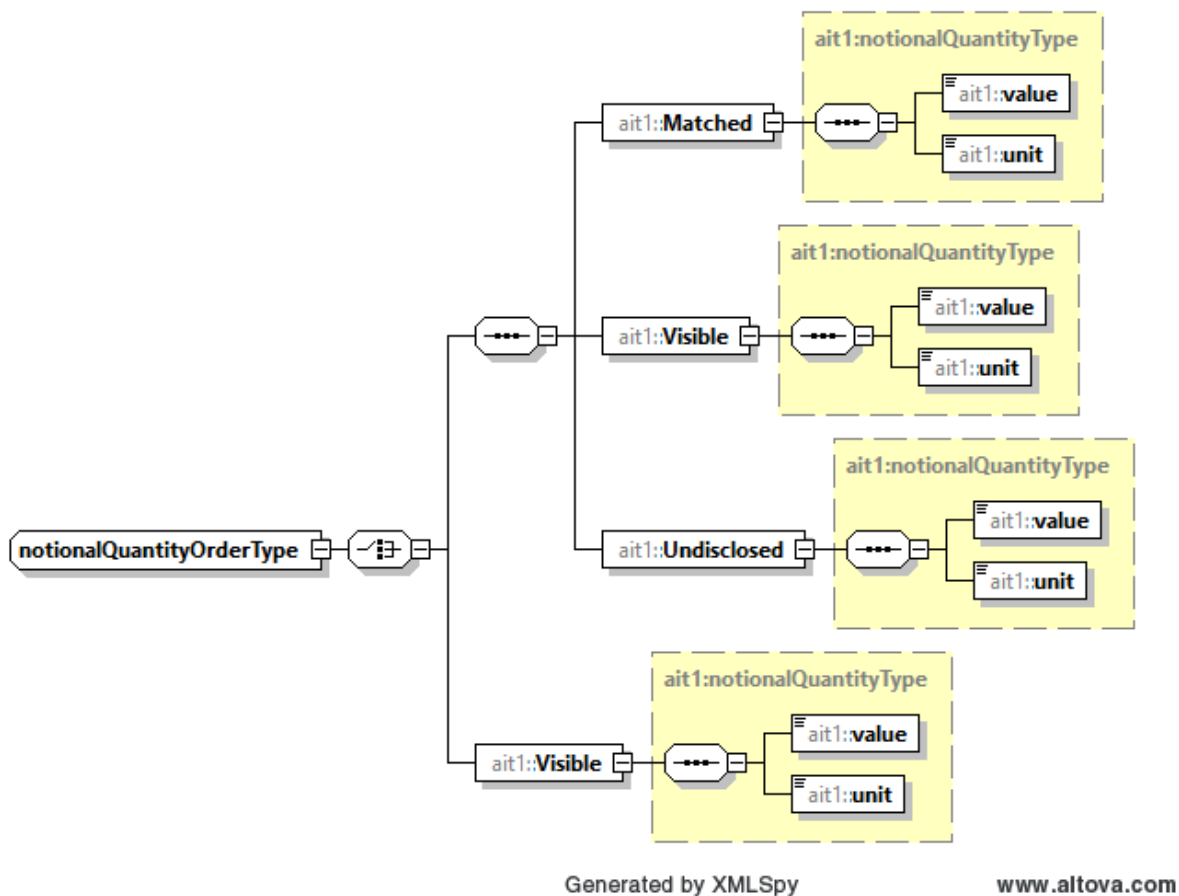
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Proposed structure for quantity (`quantityOrder`) and notionalQuantity (`notionalQuantityOrder`) types:



Generated by XMLSpy

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Schema attributes:

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

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

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

```
  <xs:sequence>
```

```
    <xs:element name="value" type="ait1:number"/>
```

```
    <xs:element name="unit" type="ait1:quantityUnitType"/>
```

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

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

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

```
  <xs:choice>
```

```
    <xs:sequence>
```

```
      <xs:element name="Matched" type="ait1:notionalQuantityType"/>
```

```
      <xs:element name="Visible" type="ait1:notionalQuantityType"/>
```

```
      <xs:element name="Undisclosed" type="ait1:notionalQuantityType"/>
```

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

```
    <xs:element name="Visible" type="ait1:notionalQuantityType"/>
```

```
  </xs:choice>
```

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

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

```
  <xs:sequence>
```

```
    <xs:element name="value" type="ait1:number"/>
```

```
    <xs:element name="unit" type="ait1:notionalQuantityUnitType"/>
```

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

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Chapter 6.6 Optionality details

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

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

- Data field 74: Minimum/Maximum quantity (new)
 - Data field 75: Minimum/Maximum total notional contract quantity (new)
-

Data Field (69) Option style

Data Field (70) Option type

Data Field (71) Option exercise date or period

Data Field (72) Option exercise frequency (new)

Data Field (73) Option strike price

Reporting guidance:

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

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

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

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

- ☐ Agree
- ☐ Do not agree

☒ No opinion

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

☐ Agree

☐ Do not agree

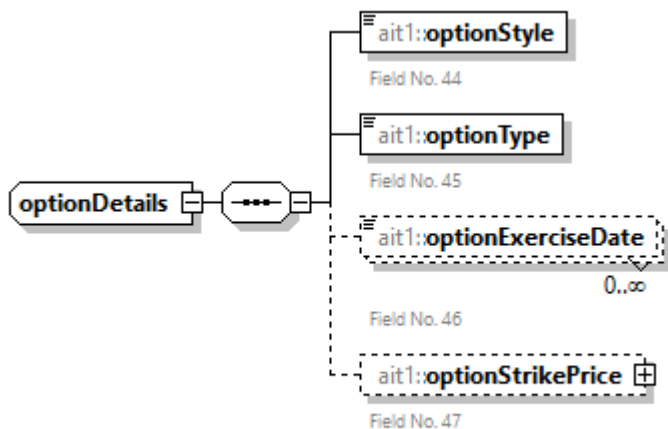
☒ No opinion

Electronic format:

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

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

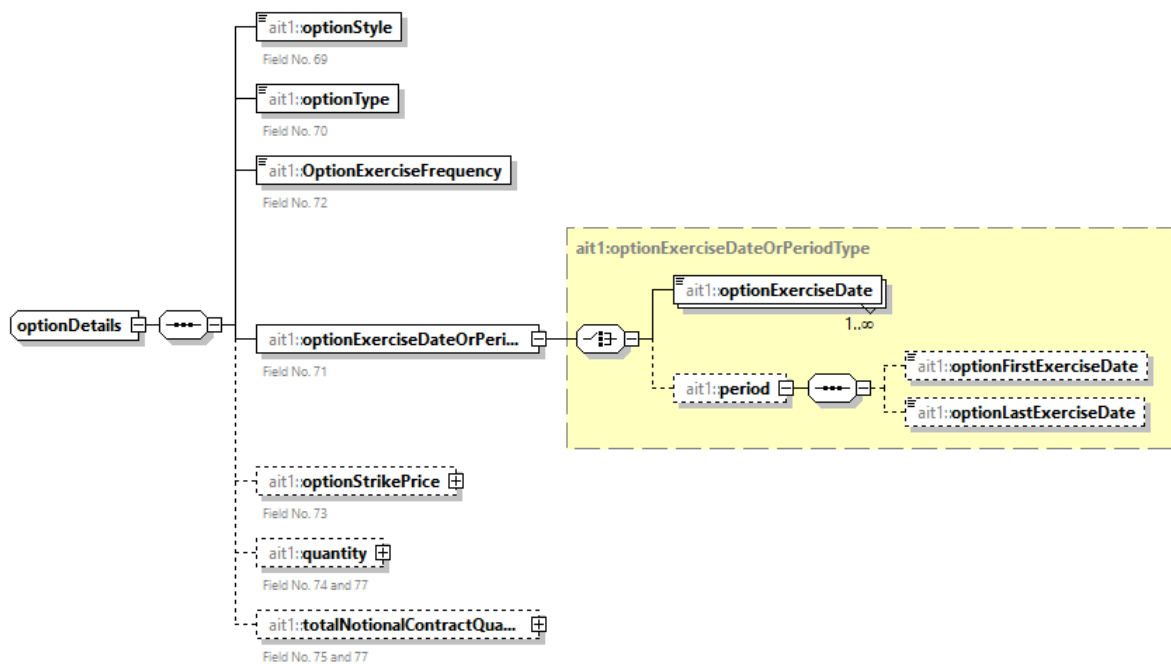
Current structure of the optionDetails type:



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Proposed structure of the optionDetails type:



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Schema attributes:

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

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

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

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

- ☐ Agree
☐ Do not agree
☒ No opinion
-

Data Field (74) Minimum/Maximum quantity (new)

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

Reporting guidance:

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

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

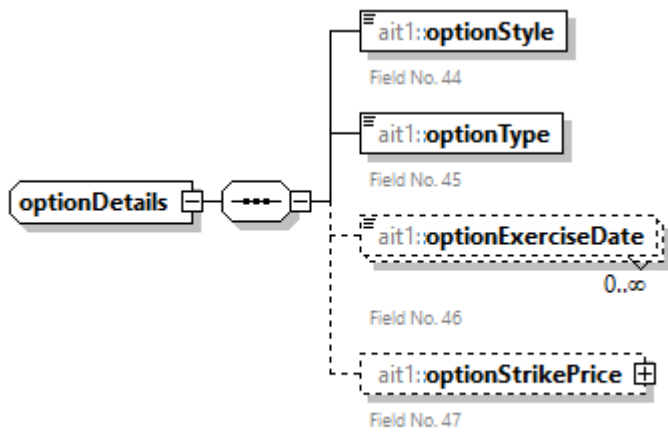
- ☐ Agree
☐ Do not agree
☒ No opinion

Electronic format:

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

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

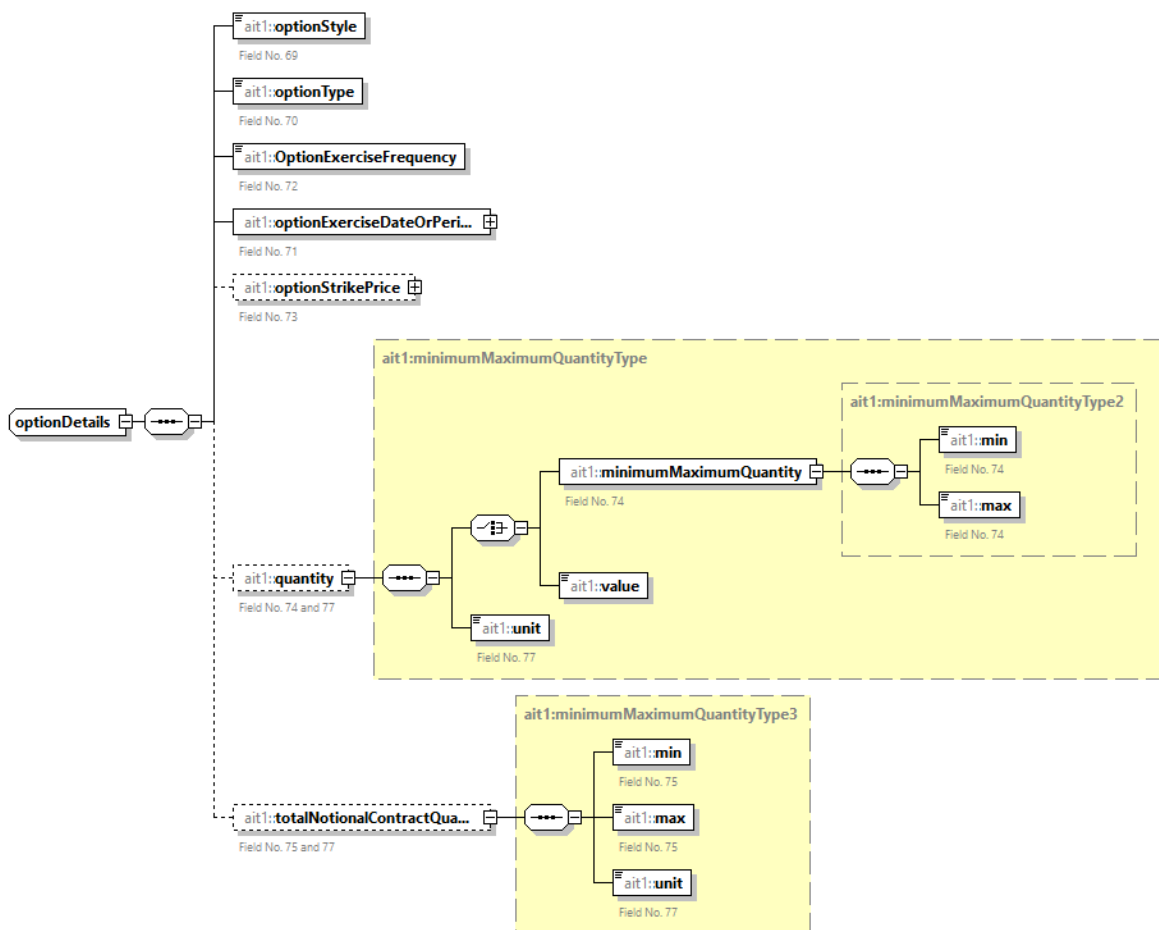
Current structure of the optionDetails type:



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Proposed structure of the optionDetails type:



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Schema attributes:

```
<xs:complexType name="minimumMaximumQuantityType">
  <xs:sequence>
    <xs:choice>
      <xs:element name="minimumMaximumQuantity" type="ait1:minimumMaximumQuantityType2" />
    </xs:choice>
  </xs:sequence>
</xs:complexType>
```

```

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

```

```

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

```

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Chapter 6.7 Delivery profile

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

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

Data Field (78) Delivery point or zone

Reporting guidance:

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

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

- ☐ Agree
- ☒ Do not agree
- ☐ No opinion

* If not agreed, please provide an alternative:

For the list of accepted EICs published on the ACER website to support effective implementation of the new validation rules, the file must be stable and manageable in an automated way. This is a basic operational requirement that the current setup does not fully meet.

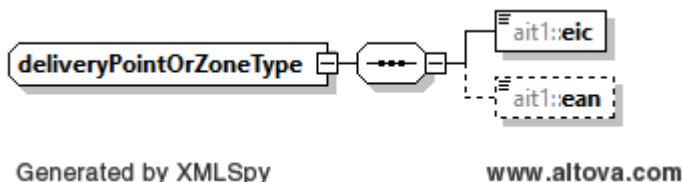
Beyond stability, there are inconsistencies between the XML and XLS formats currently published on the REMIT portal, including discrepancies in the number of valid codes and differences in content — the XLS file contains important information on EIC validity and type that is absent from the XML file. These inconsistencies need to be resolved to ensure that both formats can be relied upon equally.

Finally, whenever official lists or relevant sections of the REMIT portal are updated, stakeholders should be notified promptly. Timely communication of changes is essential for market participants to maintain compliant reporting systems.

Electronic format:

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

Proposed structure of the deliveryPointOrZone type:



Schema attributes:

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Data Field (81) Duration

Reporting guidance:

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

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

- ☐ Agree
- ☒ Do not agree
- ☐ No opinion

* If not agreed, please provide an alternative:

We already expressed concerns about the additional complexity introduced by this approach. Despite this, the TRUM draft consistently confirms that market participants will be required to implement this new reporting solution.

Given that start and end dates, load type, and load delivery intervals are already subject to reporting obligations, the inclusion of this additional field (duration) appears redundant. From both a simplification and efficiency perspective, we therefore recommend its complete removal.

If the field is nevertheless retained, the guidance on its length should be revised to “2” in order to accommodate the additional duration types “HH” and “HQ”.

Finally, the current field description assigns the “D” duration type to a balance-of-week contract, while a

balance-of-month contract is associated with the “M” duration type instead of “W”. This approach seems inconsistent with the logic applied to the former contract type and may require clarification or alignment.

Electronic format:

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

Schema attributes:

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Data Field (82) Number of periods (new)

Reporting guidance:

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

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

- ☐ Agree
- ☒ Do not agree
- ☐ No opinion

* If not agreed, please provide an alternative:

We already expressed concerns about the additional complexity introduced by this approach. Despite this, the TRUM draft consistently confirms that market participants will be required to implement this new reporting solution.

In this context, considering that start and end dates, load type, and load delivery intervals are already mandatory fields, the inclusion of the “number of periods” field appears redundant. From both a simplification and efficiency standpoint, it should therefore be removed entirely.

The draft notes that “deriving the correct NoP is relevant for the calculation of Data Field (54) Total Notional Contract Quantity.” This suggests a possible dependency whereby the TNCQ value is derived from Data Fields

(82) (number of periods) and (53) (quantity/volume). If this is not the intended calculation methodology, the introduction of a dedicated field for the number of periods does not present a clear added value. Furthermore, given that volumes are frequently expressed on a daily basis, the application of an hourly period definition may not be uniformly suitable across all contract types.

Electronic format:

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

Schema attributes:

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Data Field (83) Load type

Reporting guidance:

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

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Electronic format:

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

Schema attributes:

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

Data Field (84) Load delivery intervals

Reporting guidance:

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

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

* Do you agree with the proposed reporting guidance for field Load delivery intervals?

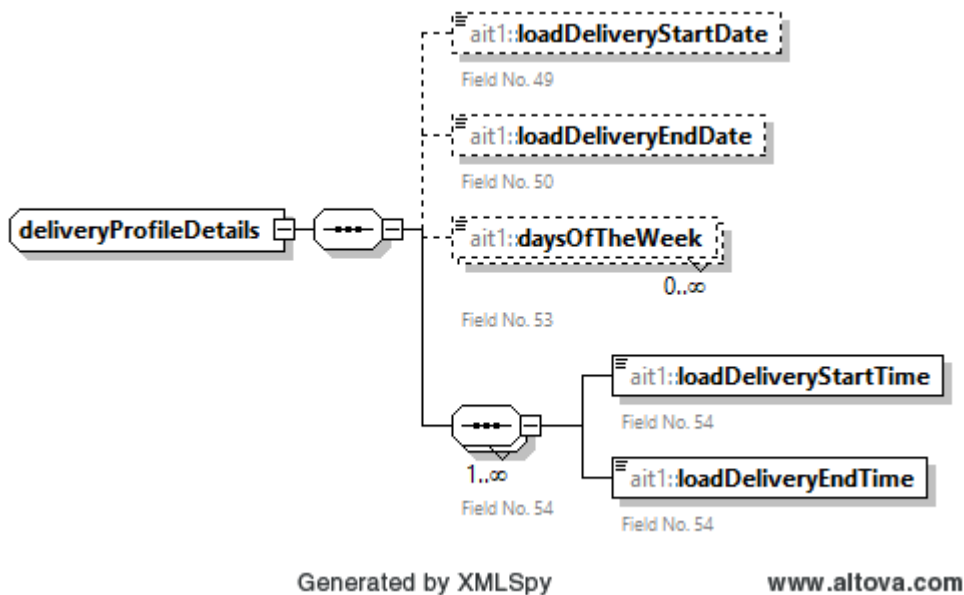
- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Electronic format:

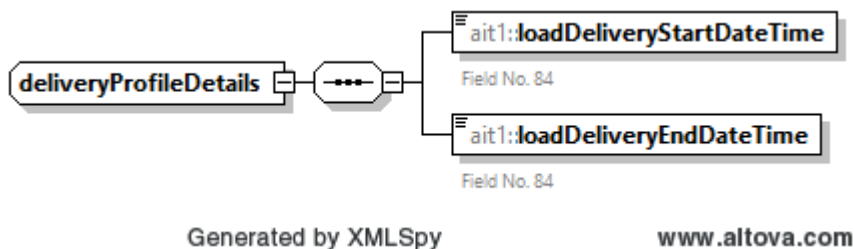
The structure of the Load delivery interval fields (84) in the existing schema is proposed to be a single, mandatory and repeatable sequence structure leading to two mandatory fields to report the load delivery start and end date and times (in "datetime" format).

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

Current structure of the deliveryProfileDetails type:



Proposed structure of the *deliveryProfileDetails* type:



Schema attributes:

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

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

- ☐ Agree
☐ Do not agree
☒ No opinion
-

Data field (87) Price/time interval quantity

Reporting guidance:

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

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

- ☐ Agree
☐ Do not agree
☒ No opinion

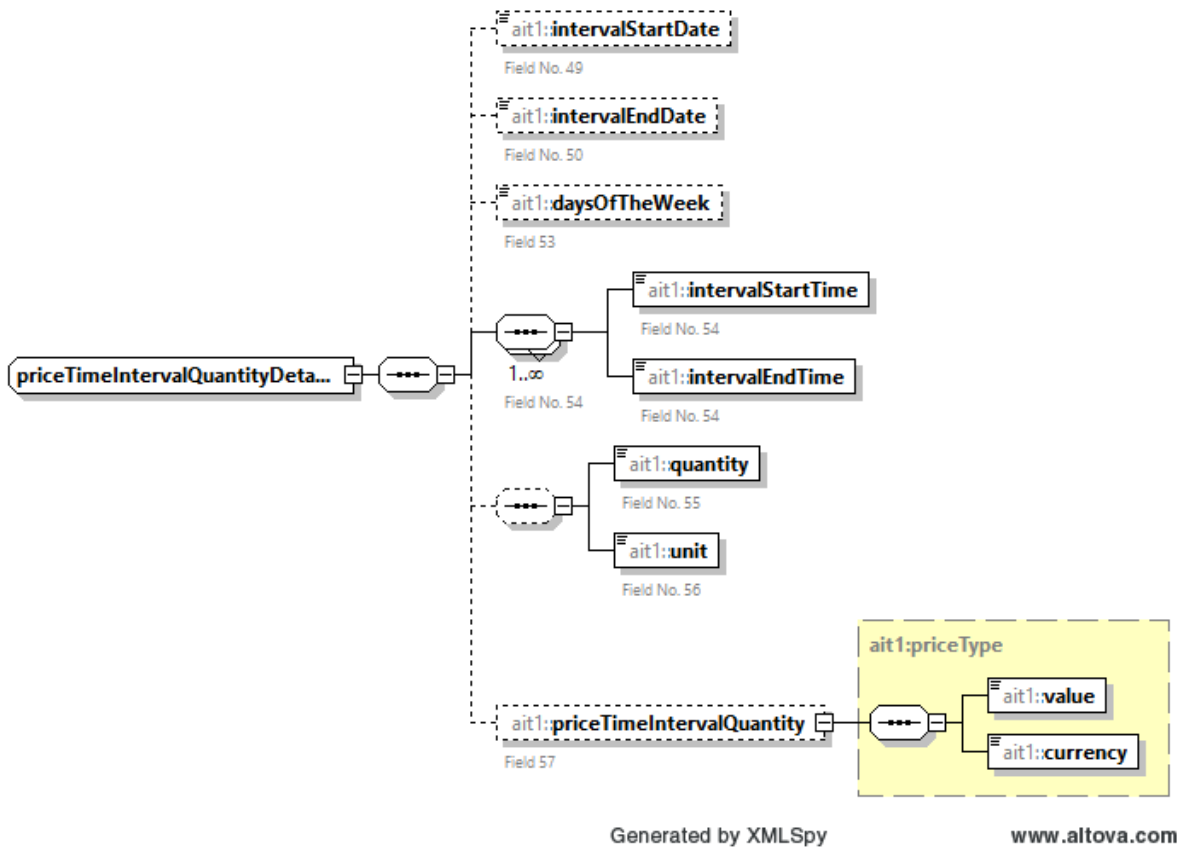
Electronic format:

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

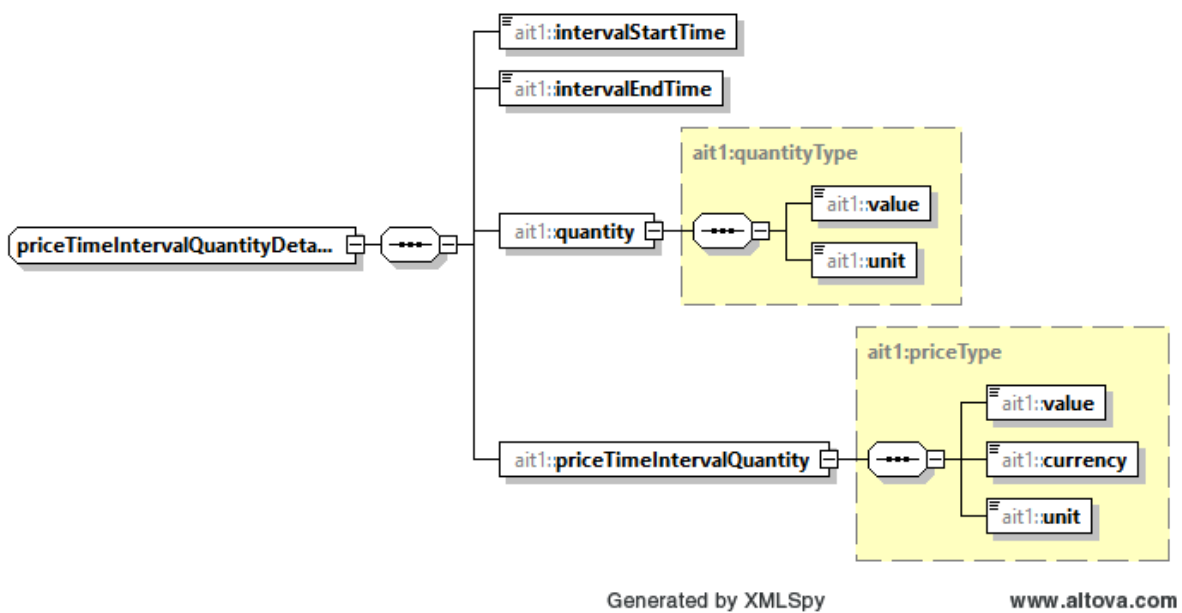
1. Fields intervalStartTime and intervalEndTime are now part of the main sequence structure under priceTimeIntervalQuantityDetails and enforced with a "datetime" restriction.
2. As a result of 1, optional fields intervalStartDate and intervalEndDate have been removed (now consolidated into fields intervalStartTime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

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

Current structure of the priceTimeIntervalQuantityDetails type:



Proposed structure of the `priceTimeIntervalQuantityDetails` type:



Schema attributes:

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

```

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

```

```

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

```

```

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

```

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Chapter 6.8 Lifecycle information

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

Data Field (88) Action type

Reporting guidance:

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

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

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

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

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

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

- ☐ Agree
- ☒ Do not agree
- ☐ No opinion

* If not agreed, please provide an alternative:

The Summary table in Annex I states that, for action type E, the corrected record with action type N should be submitted in the same XML file as the invalidation record. In practice, however, this has proven technically impossible. When both records are submitted in the same XML file on the same day, they are not processed in the correct sequential order on the ACER side. This is a long-standing issue that needs to be acknowledged and addressed in the Guidance, with a workable alternative approach clearly set out.

On a separate point, clear guidance on Table 4 lifecycle events is still missing from the consultation documents, despite being expected for Wave 1. This gap should be filled before the new obligations enter into force.

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Electronic format:

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

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

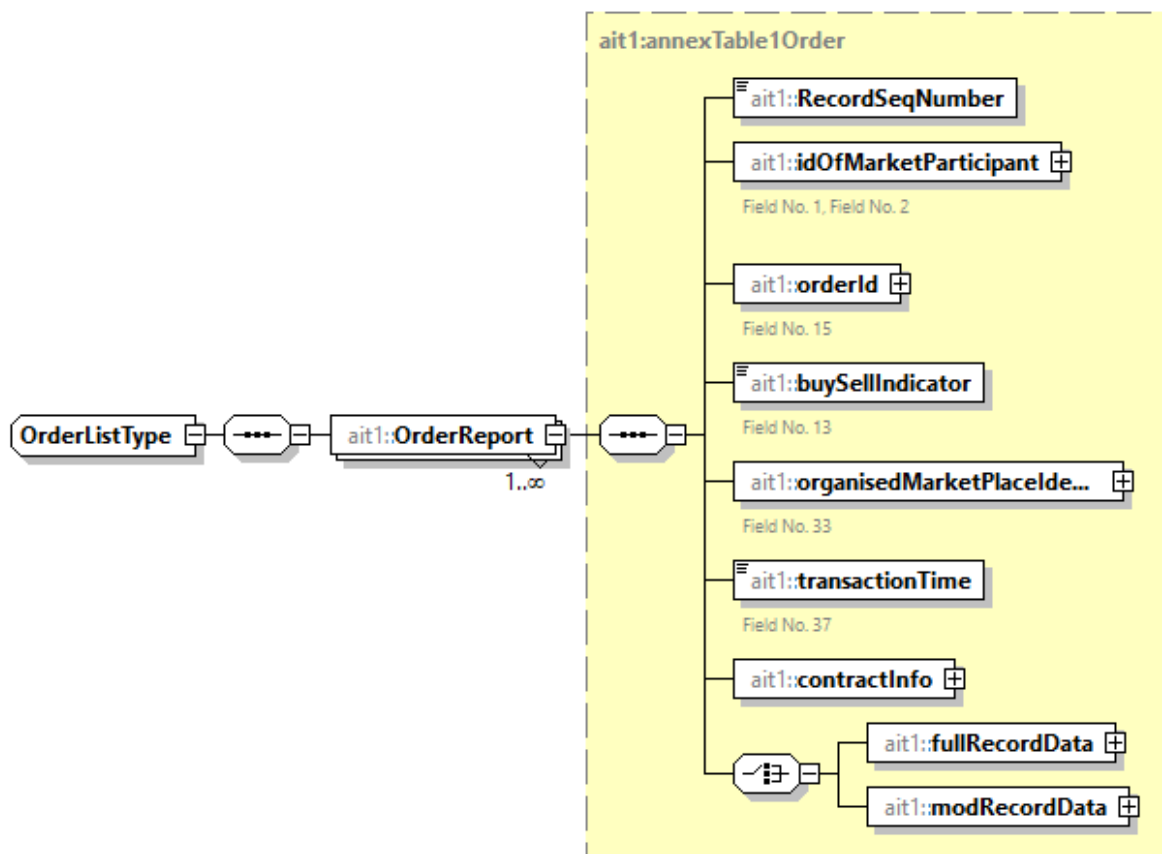
1. RecordSeqNumber

2. idOfMarketParticipant
3. orderId
4. buySellIndicator
5. organisedMarketPlaceIdentifier
6. transactionTime
7. contractInfo
8. A choice structure between:
 - fullRecordData: this sub-section includes the remainder fields of section OrderList which, combined with 1 to 7 in the list above complete the list of fields for the reporting of orders. This sub-section, which includes the mandatory Action type field, is foreseen to report new records (Action type 'N'), their modifications ('M') and cancellations ('C') as well as any errors ('E') in the records submitted.
 - modRecordData: this sub-section consists of a small subset of the fullRecordData fields and is only foreseen for the reporting of modifications or cancellations of fields Price (45 and 49), Quantity (53 and 56) and Total notional contract quantity (54). The allowed values in the Action type field implemented in this sub-section are therefore restricted to 'M' and 'C'.

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

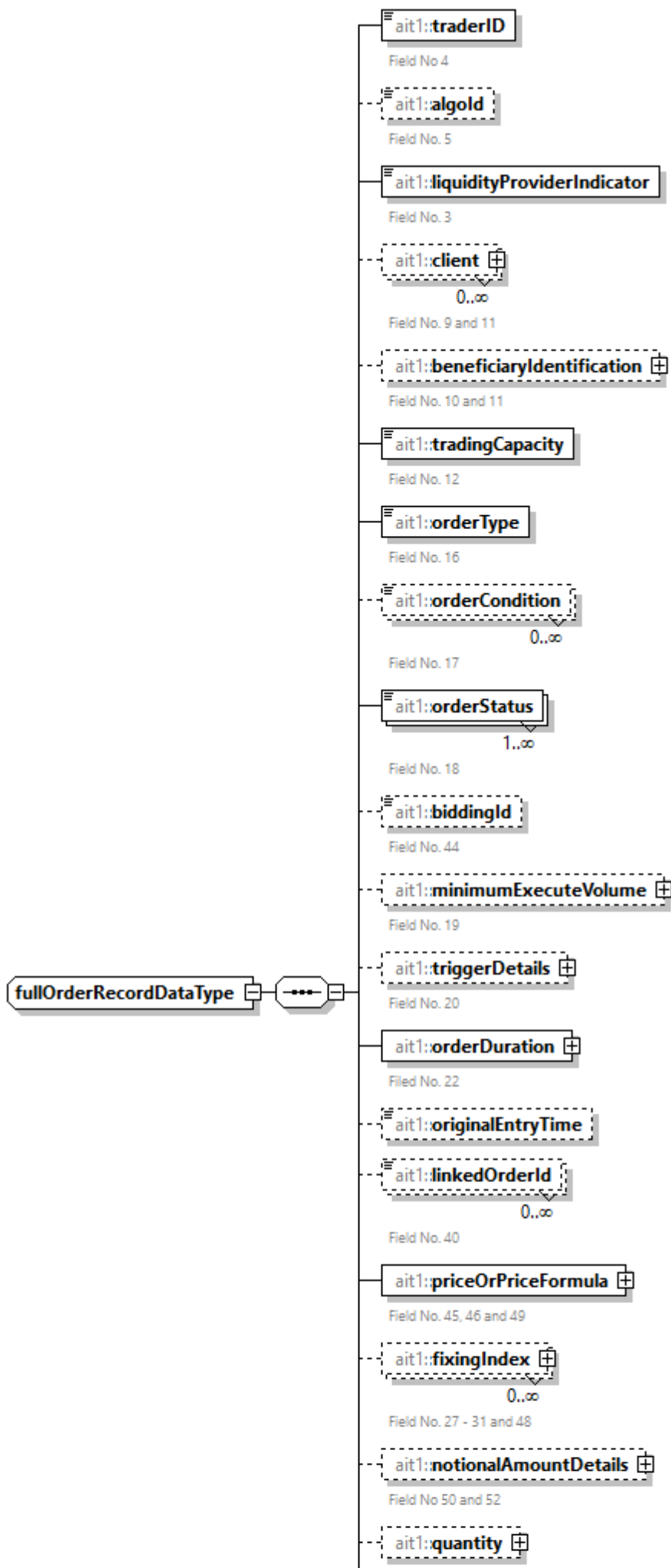
In addition, a separate Action type field has been implemented in a new, optional section of the schema named errorFileActionList (under complex type fileActionType). This section allows to error out complete files to facilitate the bulk correction of records.

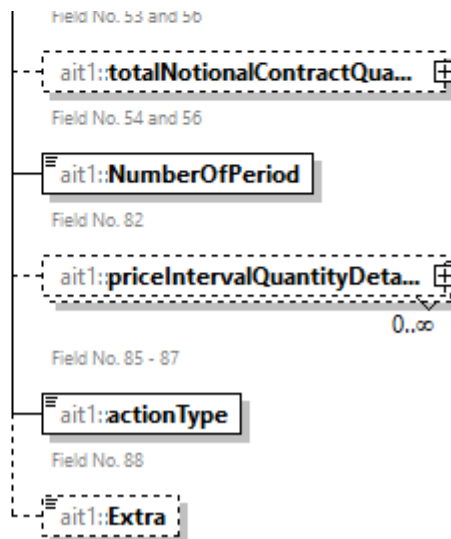
Proposed structure of the OrderList section, fullRecordData and modRecordData sub-sections:



Generated by XMLSpy

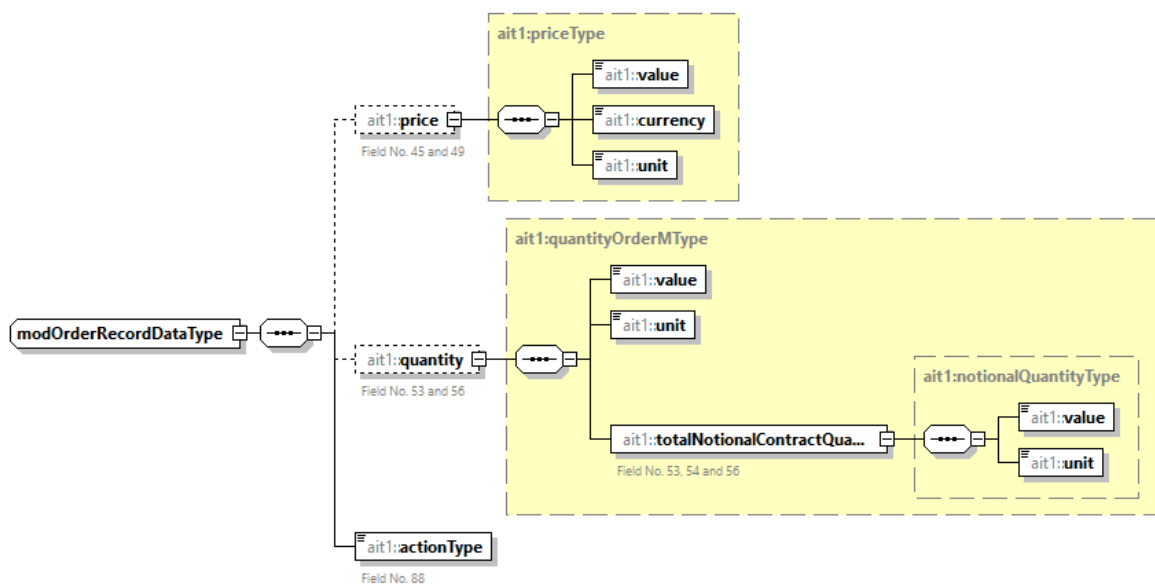
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Generated by XMLSpy

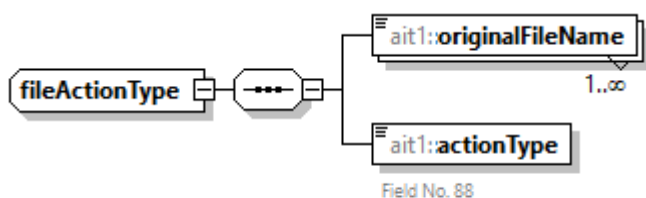
www.altova.com



Generated by XMLSpy

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Proposed structure of the fileActionType type:



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Schema attributes:

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



```

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

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

```

</xs:complexType>

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

- ☐ Agree
- ☐ Do not agree
- ☒ No opinion

Additional feedback

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

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

End of survey

Contact

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