ACER
European Union Agency for the Cooperation of Energy Regulators

ACER consultation: Revision of REMIT reporting (Table 2)

Fields marked with * are mandatory.

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 2 of the Annex to the recast REMIT Implementing Regulation for non-standard contracts. This survey is intended to be used for providing feedback on non-standard contracts to be reported on a continuous basis and non-standard contracts to be reported on a periodic basis pursuant to Article 3(a) and Article 4(2), respectively, of the recast REMIT Implementing Regulation.

The survey is organised in the following sections, in line with the Table 2 related requirements in the TRUM:

1. Chapter 2 on Supply contracts to be reported on a continuous basis (new)
2. Chapter 3 on Supply contracts to be reported on a periodic basis (new)

3. Chapter 7.2 on Contract details
4. Chapter 7.3 on Fixing index details
5. Chapter 7.4 on Option details
6. Chapter 7.5 on Delivery profile
7. Chapter 7.6 on Lifecycle information (Annex I to the TRUM)
8. Additional feedback

The consultation provides proposals for each regulatory novelty as follows:

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

Respondents have the possibility of providing feedback on any point not addressed in the survey in the section "Additional feedback" (8).

<u>How to complete the survey:</u>

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.

<u>Contact and deadline:</u>

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).

You may download here the relevant documents to support completing the survey.

TRUM (v8.0)

ACER_REMIT_TRUM_v8.0_DRAFT_v1_for_consultation.docx

Annex I to the TRUM

ACER_REMIT_TRUM_ANNEX_I_v1.0_DRAFT_v1_for_consultation.docx

Table 2 XSD

draft1.0_REMITTable2_V3.xsd

Excel model

REMITTable2_V3_Model___Consultation_.xlsx

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 2.2 describing the reporting requirements for non-standard contracts traded bilaterally by focusing on the key features of non-standard contracts and by addressing specific types of contracts such Power Purchase Agreements (PPAs) and LNG portfolio-type contracts. The draft revised guidance in 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 2.2. Reporting scenarios related to non-standard contracts

- [ ] Chapter 2.2.1. Features of a non-standard contract
- [ ] Chapter 2.2.2. Power Purchase Agreements
- [ ] Chapter 2.2.3. LNG Portfolio-type contracts

2.2.1. Features of a non-standard contract

IOGP Europe's input:

With regard to section “clearing and trade registration”, it is stated that “the original trade concluded bilaterally between the counterparties is to be considered a reportable transaction; however, there is no requirement or expectation for the original trade and the cleared trade to be linked within REMIT reporting.” In this respect, we express our support for the proposed approach.

With regard to section “Local Flexibility Products”, we understand and welcome the clarification that platforms operated either by TSOs directly or by third parties are to be considered Organised Market Places (OMPs) as far as they match multiple interest. We consider this development to be positive and view it as a potential benchmark for other market segments in which TSOs operate in their system operator capacity by facilitating competition among multiple market participants to meet system needs. Accordingly, we believe that this approach should be clarified and consistently applied across all comparable Infrastructural Operators activities and services, such as, for example, balancing.

Regarding the section “Features of a non-standard contract” we would ask you to confirm that Tab 1 should be always an allowed choice 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 to allow this possibility for standard contracts, its should be allowed also for not standard contracts should be enabled.

EXECUTIONS:

Regarding the section on Executions, we find the following sentence potentially confusing: “In the context of Executions, each exercise of the contractual right is a reportable transaction”. We would recommend deleting this sentence, as it creates uncertainty around which events qualify as “exercises” and what is meant by “contractual rights.” In particular, it may lead to different interpretations among market participants. For example, participants who currently submit a single execution report covering all commodity related billable events over a given period (e.g. monthly) could interpret this wording as requiring them to split that report into multiple individual transaction reports, each representing a separate “exercise of a contractual right” (e.g. daily nominations) and/or of events that are not related to REMIT relevant elements (e.g. credit arrangements). This would introduce unnecessary complexity and potential inconsistency in reporting practices.

In addition, please confirm that the detail required is per “delivery point” should be intended with the same granularity as “delivery point or zone” list published by ACER and not the full EIC-code list published by Entso-E / Entso- G.

Finally, at the end of “executions” section the text states: “ACER understands that there are contracts with a joint venture of producers of certain fields”. We believe that for the sake of clarity it would be appropriate to specify that the joint ventures of producers are to be considered without legal personality. Therefore, we request to add this specification in the text.

2.2.2. Power Purchase Agreements

IOGP Europe's input:

In our view, Data Field (16) Underlying mechanisms cannot be made mandatory based on the proposed values, as there may also be PPA structures driven purely by commercial considerations, without any associated subsidies, GOOs or similar schemes.

2.2.3. LNG Portfolio-type contracts

IOGP Europe's input:

WORDING ISSUES:

As a general observation, we believe that the language throughout the document should consistently align with REMIT concepts, definitions, and structural logic.

The term “executions” is used in two distinct regulatory contexts within the document without sufficient differentiation, creating a risk of ambiguity and misinterpretation. In the first context, “executions” refers to invoice-related executions—namely, the reporting of prices and quantities for non-standard contracts under Table 2 within the REMIT standard reporting framework. In the second context, the same term is used to describe firm delivery in LNG market data reporting based on long-term portfolio contracts.

To address this ambiguity, we recommend that the term “execution” be used strictly within the REMIT context to refer to the fixing of price and quantity (typically as reflected in the invoice). Conversely, when referring to the determination of LNG deliveries into the EU, we suggest using the term “cargo nominations.” This distinction would enhance conceptual clarity and prevent confusion between commercial execution and operational nomination processes.

In addition, the document should explicitly acknowledge that the LNG Table 1 scheme represents a deviation from the standard Table 1 schema under REMIT reporting obligations.

Throughout the document, multiple references are made to “Table 1” without clearly specifying whether the standard REMIT Table 1 schema or the newly introduced Table1LNG schema is intended. Given that these schemas differ in structure, field cardinality, scope of application, and validation rules, this lack of clarity introduces significant uncertainty for reporting parties. We therefore strongly recommend that all references to "Table 1" be systematically reviewed and explicitly labelled as either "standard Table 1" or "Table1LNG," as appropriate.

COMMENTS ON THE TEXT:

With regard to the requirement that a portfolio-type contract becomes reportable under Table 2 within T+10 working days from the date on which delivery into the EU is agreed, it is unclear why the reporting obligation should extend to the entire portfolio contract rather than being limited to the specific LNG delivery agreement(s) relating exclusively to the EU market.

Furthermore, the reference to the "EIC code of the agreed EU delivery terminal" within the Table 2 report appears to support the interpretation that only EU-related delivery agreements should be subject to reporting, rather than the full portfolio contract.

We would also appreciate clarification on whether, in cases where a portfolio contract specifies volumes or flexibilities dedicated to EU deliveries (distinct from those related to other destinations), only those EU-specific elements should be included in the reporting, rather than the total contractual volumes or flexibilities.

Finally, with respect to the requirement stating that "cargoes originally procured under portfolio-type contracts that are subsequently diverted and resold to other buyers are expected to be reported as a new transaction if the new agreement specifies delivery in the EU," we note that, under our understanding, REMIT reporting obligations may also arise when title transfer occurs within the EU, irrespective of the final destination. For example, if Market Participant A resells an LNG cargo in Spain to Market Participant B under an FOB contract, and Market Participant B plans to ship the cargo to Turkey, the transaction may still be considered reportable under REMIT due to the transfer of title within the EU.

Chapter 3 of the revised TRUM

The newly introduced Chapter 3 of the revised TRUM aims to provide reporting guidance on transactions relating to the supply or storage of electricity or the supply of natural gas to a single consumption unit with a technical capability to consume 600 GWh/year or more, unless concluded on an OMP.

Respondents are invited to provide feedback on the proposed reporting requirements for transactions reportable on a periodic basis in line with Article 4(2) of the recast REMIT Implementing Regulation.

Chapter 3 Supply contracts to be reported on a periodic basis

IOGP Europe's input:

The introduction of periodic reporting indicates that a further risk-based approach was taken when it comes to the frequency of reporting of data. This should also be followed with the detail degree of data in order to have a real effect on reducing bureaucracy.

Regarding the passage in the text that states "In ACER's understanding such transactions with energy intensive final consumers falling above the prespecified threshold are typically concluded bilaterally and entail features of non-standardisation. Therefore, they are expected to be reported as non-standard contracts in Table 2 together with the related Executions reported in Table 1" we advice to remove this last sentence as far as they can also have fix quantities and simple price indexes (i.e. reportable in regular Table 1).

We believe that the current draft Guidance falls short of delivering the simplification that periodic reporting for contracts with final consumers above 600 GWh/year was intended to bring. While the periodic reporting regime applies to the contract itself, execution reporting obligations remain fully in place, meaning that the overall reduction in reporting burden is marginal at best. This seems disproportionate, particularly given that such contracts are typically bi-lateral and flexible in nature, and carry a limited risk of market manipulation. Therefore, to give practical effect to the simplification objective, we would suggest replacing individual execution reports with a single aggregated execution report covering a rolling six-month period, with any lifecycle events being captured in the report for the subsequent six-month period.

Chapter 7.2 Contract details

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

- Data Field (12) Contract type
- Data Field (14) Linked transaction ID
- Data Field (15) Type of generation asset
- Data Field (16) Underlying mechanisms
- Data Field (17) Type of Power Purchase Agreement (PPA)
- Data Field (18) Delivery terms
- Data Field (19) Price or price formula
- Data Field (20) Notional amount
- Data Field (21) Notional currency
- Data Field (22) Annual contracted volume
- Data Field (23) Total notional contract quantity

Data Field (12) Contract type

Reporting guidance:

The data field identifies the type of contract that is reported in Table 2 as a non-standard contract. In the revised draft guidance, Value 'OT' for 'Other' is proposed to be deleted under this field. If disagreeing with the proposal, respondents are invited to provide feedback on use cases when none of the accepted values listed for Data Field (12) would be considered applicable, hence, value 'OT' for 'Other' needs to be reported in this field.

* Do you agree with the proposed cancellation of value 'OT' in Data Field (12)?

- Agree
- Don't agree
- No opinion

Please explain (optional):

IOGP Europe's input:

* If not agreed, please provide an alternative:

Electronic format:

The implementation of the contractType field has not changed in the new schema. The field remains a stand alone, mandatory field.

```
<xs:element name="contractType" type="ait2:contractTypeType">
```

```
        <xs:annotation>
            <xs:documentation>Field No. 12</xs:documentation>
        </xs:annotation>
</xs:element>
```

Data Field (14) Linked transaction ID (NEW)

Reporting guidance:

The newly introduced Data Field (14) identifies the linked transaction that is associated to the reported bilateral contract. The proposed guidance aims to clarify the (non-exhaustive) list of scenarios when the linked transaction ID is considered applicable.

* Do you agree with the proposed reporting guidance for Data Field (14)?

- Agree
- Don't agree
- No opinion

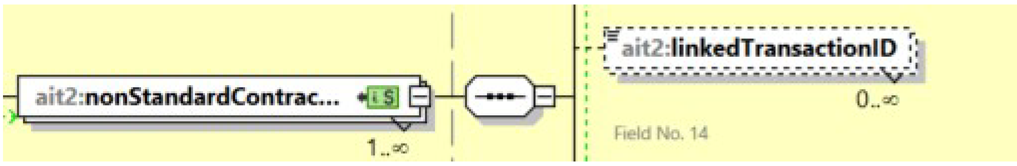
Please explain (optional)

IOGP Europe's input:

We support that the newly introduced fields 14-18 are optional. With reference to transactions outstanding before the go-live of this revised reporting, our understanding is that future lifecycle events would not have to include such field. We expect that also validation rules would be designed consistently with such understanding.

* If not agreed, please provide an alternative:

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional repeatable field to improve the data collection for PPA contracts, signaling the generation asset responsible for producing the energy

```
<xs:element name="linkedTransactionID" type="ait2:uniqueTransactionIdentifierType" minOccurs="0"
maxOccurs="unbounded">
        <xs:annotation>
                <xs:documentation>Field No. 14</xs:documentation>
        </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Linked transaction ID?

- Agree

- Don't agree
- No opinion

* Justify / Provide alternative

IOGP Europe’s input:

Please feel free to elaborate on your feedback

Data Field (15) Type of generation asset (NEW)

Reporting guidance:

The newly introduced Data Field (15) is applicable to Power Purchase Agreements (PPA) identifying the underlying generation asset that is responsible for producing the energy to be delivered. The proposed guidance aims to define the list of accepted values applicable for this field.

* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (15)?

- Agree
- Don't agree
- No opinion

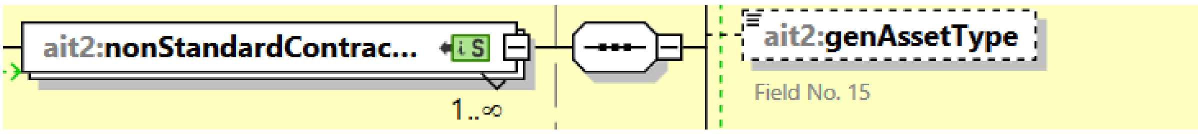
Please explain (optional):

IOGP Europe's input:

We support that the newly introduced fields 14-18 are optional. With reference to transactions outstanding before the go-live of this revised reporting, our understanding is that future lifecycle events would not have to include such field. We expect that also validation rules would be designed consistently with such understanding.

* If not agreed, please provide an alternative:

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional field to improve the data collection for PPA contracts, signaling the generation asset responsible for producing the energy

```
<xs:element name="genAssetType" type="ait2:typeGenAssetType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 15</xs:documentation>
    </xs:annotation>
</xs:element>
```

```
<xs:simpleType name="typeGenAssetType">
        <xs:restriction base="xs:string">
                <xs:enumeration value="SLR"/>
                <xs:enumeration value="HDR"/>
                <xs:enumeration value="ONW"/>
                <xs:enumeration value="OFW"/>
                <xs:enumeration value="BIM"/>
                <xs:enumeration value="NUC"/>
                <xs:enumeration value="FOS"/>
                <xs:enumeration value="PFL"/>
                <xs:enumeration value="HRE"/>
        </xs:restriction>
</xs:simpleType>
```

* Do you agree with the overall schema structure for the Type of generation asset?
  - Agree
  - Don't agree
  - No opinion

* Justify / Provide alternative
* IOGP Europe's input:

Please feel free to elaborate on your feedback

Data Field (16) Underlying mechanisms (NEW)

Reporting guidance:

The newly introduced Data Field (16) identifies the mechanism or schemes impacting the formation of the contract. The field is considered particularly applicable for PPAs that may benefit from specific regulatory, financial, or certification schemes. The proposed guidance aims to define the list of accepted values applicable for this field.

* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (16)?
  - Agree
  - Don't agree
  - No opinion

Please explain (optional):

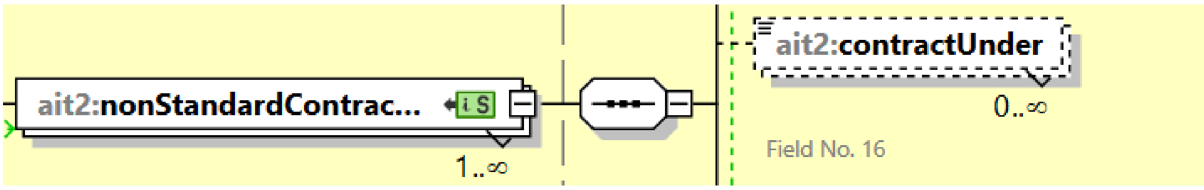
IOGP Europe's input:

We support that the newly introduced fields 14-18 are optional. With reference to transactions outstanding before the go-live of this revised reporting, our understanding is that future lifecycle events would not have to include such field. We expect that also validation rules would be designed consistently with such understanding.

In our view, this field cannot be made mandatory based on the proposed values, as there may also be PPA structures driven purely by commercial considerations, without any associated subsidies, GOOs or similar schemes.

* If not agreed, please provide an alternative:

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional repeatable field to improve the data collection for PPA contracts, signaling the mechanism impacting the formation of the contract.

```
<xs:element name="contractUnder" type="ait2:contractUnderlyingType" minOccurs="0" maxOccurs="
unbounded">
        <xs:annotation>
                <xs:documentation>Field No. 16</xs:documentation>
        </xs:annotation>
</xs:element>

<xs:simpleType name="contractUnderlyingType">
        <xs:restriction base="xs:string">
                <xs:enumeration value="SUB"/>
                <xs:enumeration value="REL"/>
                <xs:enumeration value="GOO"/>
        </xs:restriction>
</xs:simpleType>
```

* Do you agree with the overall schema structure for the Underlying mechanisms?

- Agree
- Don't agree
- No opinion

* Justify / Provide alternative

IOGP Europe’s input:

Please feel free to elaborate on your feedback

IOGP Europe’s input:

Data Field (17) Type of Power Purchase Agreement (PPA) (NEW)

Reporting guidance:

The newly introduced Data Field (17) identifies the contractual structure of a PPA by specifying how the electricity delivery and the related payments are structured. The proposed guidance aims to define the list of accepted values applicable for this field.

* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (17)?

- Agree
- Don't agree
- No opinion

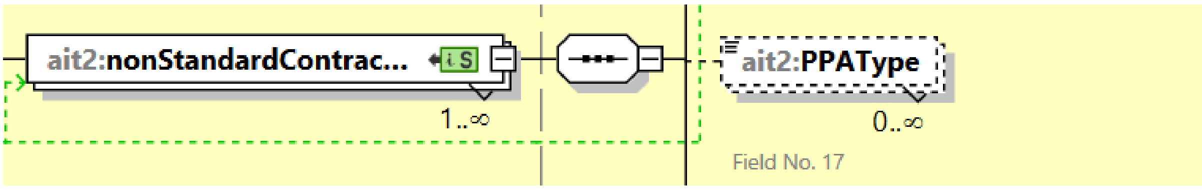
Please explain (optional):

IOGP Europe's input:

We support that the newly introduced fields 14-18 are optional. With reference to transactions outstanding before the go-live of this revised reporting, our understanding is that future lifecycle events would not have to include such field. We expect that also validation rules would be designed consistently with such understanding.

* If not agreed, please provide an alternative:

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional repeatable field to improve the data collection for PPA contracts, signaling the contractual structure of the PPA.

```
<xs:element name="PPAType" type="ait2:PPATypeType" minOccurs="0" maxOccurs="unbounded">
     <xs:annotation>
          <xs:documentation>Field No. 17</xs:documentation>
     </xs:annotation>
</xs:element>

<xs:simpleType name="PPATypeType">
     <xs:restriction base="xs:string">
          <xs:enumeration value="PN"/>
          <xs:enumeration value="PC"/>
          <xs:enumeration value="BL"/>
          <xs:enumeration value="PP"/>
          <xs:enumeration value="PF"/>
```

```
            <xs:enumeration value="FH"/>
            <xs:enumeration value="DP"/>
            <xs:enumeration value="OT"/>
        </xs:restriction>
    </xs:simpleType>
```

* Do you agree with the overall schema structure for the Type of Power Purchase Agreement (PPA)?

- Agree
- Don't agree
- No opinion

* Justify / Provide alternative

IOGP Europe’s input:

Please feel free to elaborate on your feedback

Data Field (18) Delivery terms (NEW)

Reporting guidance:

The newly introduced Data Field (18) is applicable for contracts for the supply of LNG (typically LNG portfolio type contracts as described in TRUM chapter 2.2.3), and it shall identify the terms of the delivery as specified in the contract by referring to the respective Incoterms. The proposed guidance aims to define the list of accepted values applicable for this field.

* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (18)?

- Agree
- Don't agree
- No opinion

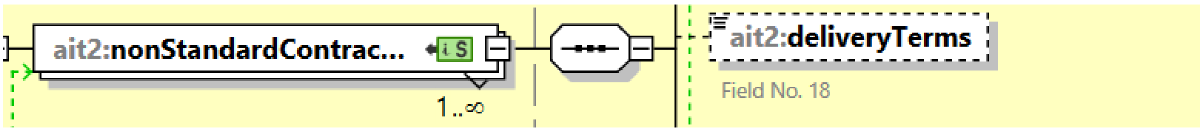
Please explain (optional):

IOGP Europe's input:

We support that the newly introduced fields 14-18 are optional. With reference to transactions outstanding before the go-live of this revised reporting, our understanding is that future lifecycle events would not have to include such field. We expect that also validation rules would be designed consistently with such understanding.

* If not agreed, please provide an alternative:

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional field to improve the data collection for LNG contracts, signaling the terms of delivery.

```
<xs:element name="deliveryTerms" type="ait2:deliveryTermsType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 18</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Delivery terms?

- Agree
- Don't agree
- No opinion

* Justify / Provide alternative

* IOGP Europe's input:

Please feel free to elaborate on your feedback

Data Field (19) Price or price formula

Reporting guidance:

The data field identifies the agreed price per unit of energy. If the contract includes a price formula the formula shall be reported in this field. The proposed reporting guidance aims to clarify how to report complex price formulas under Data Field (19).

* Do you agree with the proposed reporting guidance for Data Field (19)?

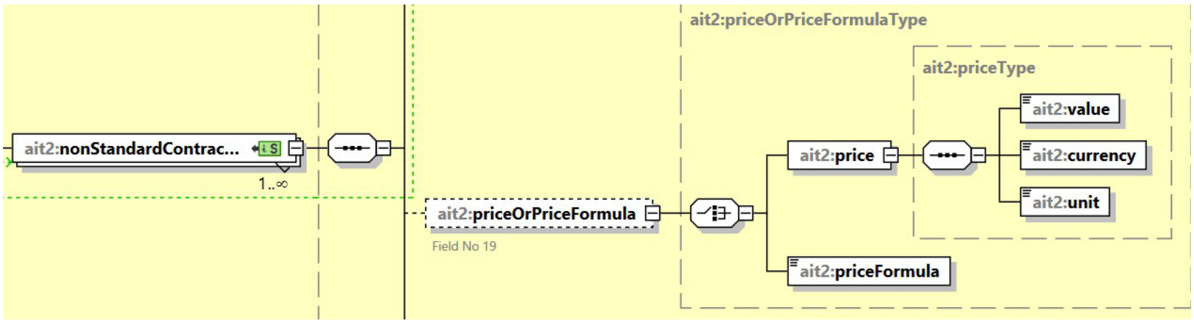
- Agree
- Don't agree
- No opinion

Please explain (optional):

IOGP Europe's input:

* If not agreed, please provide an alternative:

Electronic format:



Optional field present in the existing Table 2 format and with the only change of the expansion of the priceType complex type (also included in optionStrikePrice and notionalAmount) to include the quantityUnitType subfield to improve the price reporting details.

```
<xs:element  name="priceOrPriceFormula"  type="ait2:priceOrPriceFormulaType"  minOccurs="0">
     <xs:annotation>
          <xs:documentation>Field No 19</xs:documentation>
     </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Price or price formula?

- Agree
- Don't agree
- No opinion

* Justify / Provide alternative

IOGP Europe's input:

Please feel free to elaborate on your feedback

IOGP Europe's input:

Data Field (20) Notional amount

Reporting guidance:

The data field identifies the notional amount of the contract. The revised guidance requirements propose to report always an estimation in this field if there is no outright price.

* Do you agree with the proposed reporting guidance for Data Field (20)?
- Agree
- Don't agree
- No opinion

Please explain (optional):

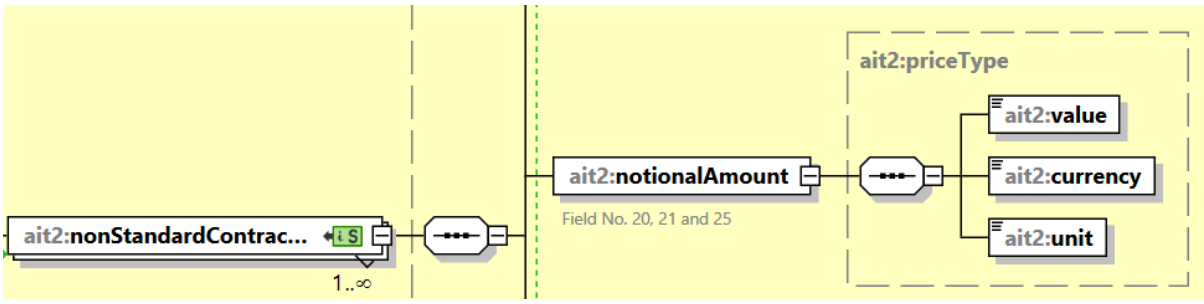
IOGP Europe's input:

ACER's text states that "The field indicates the notional amount of bilateral contract. If the calculation is subject to variables, an estimation shall be provided". In our opinion, further explanation is needed when it comes to what is considered as "variable" or "totaly uncertain", as in case of full flexible consumption contracts or contracts for the offtake of excess volumes or of the entire production of an asset.

* If not agreed, please provide an alternative:

* IOGP Europe's input:

Electronic format:



Optional field in the existing Table 2 format, reimplemented as a mandatory field with the expansion of the priceType complex type (also included in optionStrikePrice and priceOrPriceFormula) to include the quantityUnitType subfield to improve the price reporting details.

```
<xs:element name="notionalAmount" type="ait2:priceType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 20, 21 and 25</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Notional amount?
- Agree
- Don't agree

No opinion

* Justify / Provide alternative
* IOGP Europe’s input:

Please feel free to elaborate on your feedback

IOGP Europe’s input:

Data Field (21) Notional currency

Reporting guidance:

The data field identifies the currency for the notional value of the contract. The revised list of currencies proposes to introduce Turkish lira.

* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (21)?

Agree

Don't agree

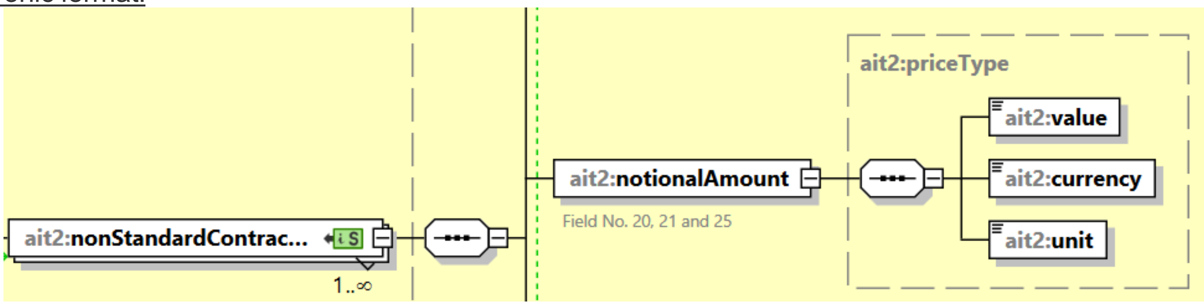
No opinion

Please explain (optional):

IOGP Europe’s input:

* If not agreed, please provide an alternative:
* IOGP Europe’s input:

Electronic format:



Mandatory field present in the existing Table 2 format (also included in optionStrikePrice and notionalAmount), reimplemented with changes in the values, by the removal of outdated (BGN, HRK) and unused currencies (EUX, GBX, OTH), and introduction of the TRY currency.

```
<xs:element name="currency" type="ait2:currencyCodeType">
    <xs:annotation>
        <xs:documentation>Currency Value</xs:documentation>
```

</xs:annotation>

</xs:element>

* Do you agree with the overall schema structure for the Notional currency?

- Agree
- Don't agree
- No opinion

* Justify / Provide alternative

IOGP Europe’s input:

Please feel free to elaborate on your feedback

IOGP Europe’s input:

* Do you agree with the proposed allowed values for the reporting of the Notional currency? (removal of values “OTH”, "BGN", "GBX", "EUX", “HRK”, and addition of “TRY”)

- Agree
- Don't agree
- No opinion

* Justify / Provide alternative

IOGP Europe’s input:

Please feel free to elaborate on your feedback

IOGP Europe’s input:

Data Field (22) Annual contracted volume (NEW)

Reporting guidance:

The newly introduced Data Field (22) indicates the annual contracted volume as agreed between the counterparties for the total amount of energy to be delivered in the next calendar year under the framework of the bilateral contract reported already in Table 2. The proposed reporting guidance indicates that the annual contracted volumes are typically agreed as part of the Annual Delivery Programmes related to LNG portfolio-type contracts.

* Do you agree with the proposed reporting guidance for Data Field (22)?

- Agree
- Don't agree
- No opinion

Please explain (optional):

IOGP Europe’s input:

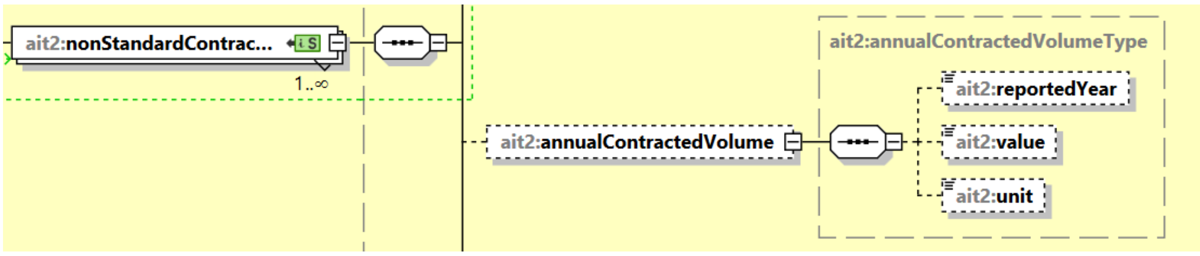
* If not agreed, please provide an alternative:

IOGP Europe's input:

Where annual volumes are defined or periodically fixed, this information is already captured through the volume optionality interval fields (Fields 19 to 23, as per TRUM). If ACER considers that these fields are not being reported correctly, introducing an additional field would not address the underlying issue.

Moreover, there are various types of multiannual contracts for which volumes are neither predetermined nor fixed on an annual basis (e.g. fully flexible contracts). In such cases, actual volumes can instead be derived from execution reports.

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional field to improve the data collection for LNG contracts, signaling the annual contracted volume, its unit, and the year of reference.

<xs:element name="annualContractedVolume" type="ait2:annualContractedVolumeType" minOccurs="0"/>

* Do you agree with the overall schema structure for the Annual contracted volume?

- Agree
- Don't agree
- No opinion

* Justify / Provide alternative

IOGP Europe's input:

Please feel free to elaborate on your feedback

IOGP Europe's input:

Data Field (23) Total notional contract quantity

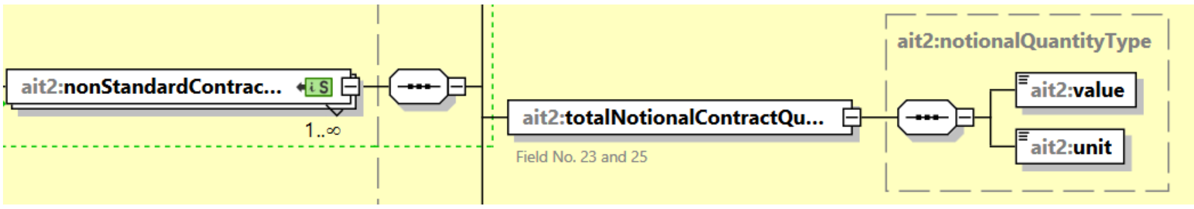
Reporting guidance:

There are no changes foreseen in the reporting guidance for this field.

Other comments on Data Field (23) (optional)

IOGP Europe's input:

Electronic format:



Optional field in the existing Table 2 format, reimplemented as a mandatory field.

```
<xs:element name="totalNotionalContractQuantity" type="ait2:notionalQuantityType" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 18</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Total Notional Contract Quantity?

- Agree
- Don't agree
- No opinion

* Justify / Provide alternative

IOGP Europe's input:

Please feel free to elaborate on your feedback

IOGP Europe's input:

Chapter 7.3 Fixing index details

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

- Data Field (36) Settlement method

Data Field (36) Settlement method

Reporting guidance:

The data field identifies the type of settlement for the bilateral contract. The revised list of accepted values intend to reflect the type of settlement method and whether the parties had an option over the settlement method.

* Do you agree with the proposed reporting guidance and list of accepted values for Data Field (36)?

- Agree
- Don't agree
- No opinion

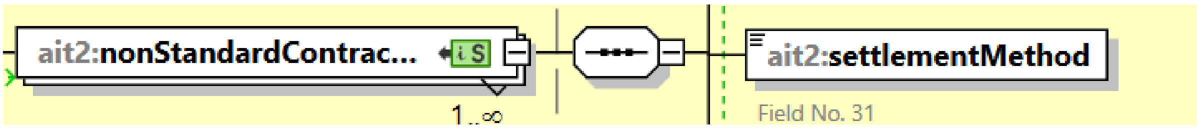
Please explain (optional):

IOGP Europe's input:

* If not agreed, please provide an alternative:

IOGP Europe's input:

<u>Electronic format:</u>



Mandatory field in the existing Table 2 format, reimplemented with a split of the value "O" into "P_OP" and "C_OP" to improve the physical/cash optionality reporting data.

```
<xs:element name="settlementMethod" type="ait2:settlementMethodType" default="P">
    <xs:annotation>
        <xs:documentation>Field No. 31</xs:documentation>
    </xs:annotation>
</xs:element>

<xs:simpleType name="settlementMethodType">
    <xs:restriction base="xs:string">
        <xs:enumeration value="P"/>
        <xs:enumeration value="C"/>
        <xs:enumeration value="P_OP"/>
        <xs:enumeration value="C_OP"/>
    </xs:restriction>
</xs:simpleType>
```

* Do you agree with the overall schema structure for the Settlement method?

- Agree
- Don't agree
- No opinion

* Justify / Provide alternative

IOGP Europe's input:

Please feel free to elaborate on your feedback

IOGP Europe's input:

Chapter 7.4 Option details

Reporting requirements:

There are no changes foreseen in the reporting guidance for the data fields related to option details. Nevertheless, respondents are invited to provide feedback on the reporting of details of non-standard option contracts they propose to be revised / further clarified in the guidance.

Feedback on reporting option details (optional)

IOGP Europe's input:

Chapter 7.5 Delivery profile

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

- Data Field (49) Number of periods
- Data Field (50) Load type

Data Field (49) Number of periods [NEW]

Reporting guidance:

The data field represents the calculated number of time units the quantity is delivered based on the delivery profile, using an hourly resolution. It reflects the total count of distinct hourly periods over which deliveries occur within the bilateral contract's timeframe. This field is only applicable for non-standard contracts with a fixed delivery profile.

* Do you agree with the proposed reporting guidance for Data Field (49)?

- Agree
- Don't agree
- No opinion

Please explain (optional):

IOGP Europe's input:

* If not agreed, please provide an alternative:

IOGP Europe's input:

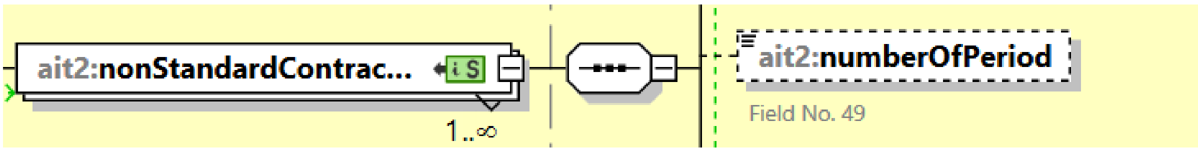
Given that executions are already reported under Table 1 on the basis of actual volumes and prices, the added value of Data Field (49) is not evident, even where the delivery profile is fixed.

Furthermore, the scope of this field appears to be primarily limited to electricity contracts, as its description refers to hourly structures. It is therefore unclear how it should be applied to gas contracts, where volumes are typically expressed on a daily delivery basis rather than through an hourly profile.

This lack of clarity introduces a risk of inconsistent interpretation across different commodity types and limits the practical usefulness of the field, particularly for certain non-standard contracts.

In light of these considerations, the relevance of retaining this data field seems limited, and its removal could be considered, as it does not appear to add meaningful information beyond what is already captured through execution reporting in Table 1.

Electronic format:



New field in the legal text of the recast REMIT IR, implemented as an optional field to improve the reporting of the delivery profile.

```
<xs:element name="numberOfPeriod" type="ait2:restrictedDecimal" minOccurs="0">
    <xs:annotation>
        <xs:documentation>Field No. 49</xs:documentation>
    </xs:annotation>
</xs:element>
```

* Do you agree with the overall schema structure for the Number of periods?

- Agree
- Don't agree
- No opinion

* Justify / Provide alternative

* IOGP Europe’s input:

Please feel free to elaborate on your feedback

IOGP Europe’s input:

Data Field (50) Load type

Reporting guidance:

The data field identifies the load type of the contract that is reported in Table 2 as a non-standard contract. In the revised draft guidance, Value ‘OT’ for 'Other' is proposed to be deleted under this field. If disagreeing with the proposal, respondents are invited to provide feedback on use cases when none of the accepted values listed for Data Field (50) would be considered applicable, hence, value 'OT' for 'Other' needs to be reported in this field.

* Do you agree with the proposed cancellation of value 'OT' in Data Field (50)?

- Agree
- Don't agree
- No opinion

Please explain (optional):

IOGP Europe’s input:

* If not agreed, please provide an alternative:

IOGP Europe’s input:

Electronic format:

The implementation of the loadType field has not changed in the new schema. The field remains a stand alone, optional field.

```
<xs:element name="loadType" type="ait2:contractloadType" minOccurs="0">
        <xs:annotation>
            <xs:documentation>Field No. 50</xs:documentation>
       </xs:annotation>
</xs:element>
```

Chapter 7.6 Lifecycle information

This section focuses on the guidance of Data Field (51) Action type as proposed in the revised Annex I to the TRUM in relation to lifecycle events of bilateral contracts.

Data Field (51) Action type

Reporting guidance:

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

Respondents are requested to provide general feedback on reporting lifecycle events of bilateral contracts as described in Chapter 6 in the draft Annex I to the TRUM, by focusing on Chapter 6.2.3 on invalidating a wrongly submitted contract in particular.

* Do you agree with the proposed guidance described in Chapter 6.2.3 on Invalidating a wrongly submitted contract?

- Agree
- Don't agree
- No opinion

Please explain (optional):

IOGP Europe’s input:

* If not agreed, please provide an alternative:

IOGP Europe’s input:

Electronic format:

The implementation of the actionType field has not changed in the new schema. The field remains a stand alone, mandatory field.

```
<xs:element name="actionType" type="ait2:actionTypesType">
    <xs:annotation>
        <xs:documentation>Field No. 51</xs:documentation>
    </xs:annotation>
</xs:element>
```

Additional feedback

Please provide any additional feedback related to proposed revision of the reporting guidance and electronic formats under Table 2 or other elements not included in the survey. You may upload support materials.

IOGP Europe's input:
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 acute in the case of the present document, which is notably lengthy and seeks to consolidate several prior documents into a new reporting structure by modifying an existing table currently used for different data purposes. The complexity and novelty of this approach would warrant additional scrutiny that a single consultation round does not adequately allow for.
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 general comment on the structure of TRUM, we kindly request that in the summary table of each field (in addition to "No.", "Field Identifier", "Description" and "Representation in the electronic format") it is included also the information on field cardinality, in order to improve the readability of the document and make the information clearer.

With reference to the novation of reports in Table 2, Chapter 4.1.1 of Annex I states that early termination should be reported and that the effective date of the change should be indicated via the Termination Date (Field 57). However, as this field exists only in Table 1, and previous guidance required the Delivery End Date to reflect the effective date for Table 2, it remains unclear how this should now be reported.
Clarification would therefore be appreciated on where to indicate the effective date in case of novation in Table 2 under the updated guidance.

Please upload your file(s) using the following filename format: [Name of the organisation you represent] _REMIT T2

End of survey